



**FACING
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NETWORK**



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FACING FACTS NETWORK RESPONSE TO Targeted public consultation on the Guidelines on the trusted flagger mechanism under Article 22 of Regulation (EU) 2022/2065 (Digital Services Act)

This consultation comes at a time of great challenge for those who have dedicated themselves to monitor hate online in recent years, including under the Code of Conduct on countering illegal hate speech online monitoring exercises, since 2016. Platforms are rolling back protections, algorithms amplify division, and the communities our members serve face intensifying harm. As Facing Facts explained in our [2025 blog](#), this moment has called for honesty about the frontline reality of monitoring and reporting online hate and has led established, highly skilled and professional organisations to give up these crucial functions as a result. The need to protect staff—who are often young and often members of the most targeted communities—and growing support for a strategic shift to identify more effective ways of holding platforms accountable, are common reasons behind these difficult decisions. While the motivation to protect communities and the fundamental rights that are at the core of our democracies remains a driving force for many of our members, much needs to be done to improve support and protection for those at the frontline of monitoring hate. We greatly welcome this consultation, which reflects a recommendation from our [2024 Policy Brief on the DSA](#). We hope that the expert, detailed and evidenced contributions from our members below—several of whom have deep expertise in monitoring, including as current Trusted Flaggers and monitoring reporters—support the process of strengthening the role of Trusted Flaggers and, ultimately, broader hate response systems for the benefit of societies across Europe.

This document presents the Facing Facts Network response to the *Targeted public consultation on the Guidelines on the trusted flagger mechanism under Article 22 of Regulation (EU) 2022/2065 (Digital Services Act)*, coordinated by the Facing Facts Network Secretariat, CEJI. It draws on feedback and contributions gathered through a dedicated online consultation, written comments and reports submitted by Network members, and discussions held during a special session at the Facing Facts Network Annual Meeting (Vienna, 29–30 June 2026), which brought together Network members, Digital Services Coordinators, and other actors involved in the hate speech response system.

This input has been compiled by CEJI – A Jewish Contribution to an Inclusive Europe (Belgium), in its capacity as Secretariat of the Facing Facts Network. It is based on direct contributions and feedback received from eleven member organisations of the Network, of which the following have consented to be mentioned: DigiQ (Slovakia), *Fondazione Centro di Documentazione Ebraica Contemporanea (CDEC)* (Italy), *Fundación Secretariado Gitano* (Spain)*, *Háttér Society* (Hungary), *Human Rights House Zagreb* (Croatia), *INACH Secretariat* (The Netherlands), *Jewish Association Czulent* (Poland), *Ligue Internationale Contre le Racisme et l'Antisémitisme (LICRA)* (France), *The “Elie Wiesel” National Institute for the Study of the Holocaust in Romania* (Romania), and *ZARA – Zivilcourage und Anti-Rassismus-Arbeit* (Austria)*.

* Submitted its own contribution to the consultation, which was shared with the Facing Facts Network Secretariat and taken into account in the drafting process of this document. Relevant points from the FSG and ZARA contributions were incorporated into the document where appropriate. Their submissions may include additional points that are not reflected in this document.

The Facing Facts Network, coordinated by [CEJI – A Jewish Contribution to an inclusive Europe](#), works across communities and institutions to strengthen hate crime and hate speech response systems in Europe and beyond for the benefit of victims, communities and EU societies.

The EU-Funded project [Facing Facts Network counts 41 members in 20 European Union countries](#).

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Document overview

Part one of the document summarises the key themes and recommendations arising from Facing Facts Members' detailed comments. Section two sets out detailed comments according to each section of the EC Draft Trusted Flagger guidelines. It is important that the table is fully considered. It contains detailed and key insights from practitioners who have been carrying out the TF role with great diligence, skill and commitment, often in very challenging circumstances. The constructive criticisms of the guidelines contained in this document are based on direct experience and a strong motivation to make the TF role work in the way that is envisaged by the DSA. These considered comments present an invaluable insight into the current challenges faced by TFs and their hopes for an improved system and more effective support, recognition and resourcing.

Part one: Overview, themes and recommendations

Network members pointed to the **major challenge of the lack of funding for the Trusted Flagger (TF) mandate, despite the role attracting significant resourcing and administrative burdens as well as reputational and other risks**. TF duties are largely voluntary, unpaid and self-resourced. The burden can be unsustainable for small civil society organisations which need to prioritise their resources for community support and advocacy. Application, independence and reporting obligations (especially the Annex II template) are disproportionate for small CSOs. Several members are considering removing themselves from the role or not applying at all. Connected to this, there is a **lack of clarity on independence in connection with the potential funding of TF activities by platforms**. The term "independence" is ill-defined; there needs to be defined thresholds for acceptable vs unacceptable funding, a specific definition of conflict of interest, and assessment of material/functional/reputational dependence — without funding rules that leave only large, well-funded TFs standing. Further, our members identified the tension between the benefits of gathering and presenting detailed data in TF annual reports and the challenge of an added burden that might not be possible in the current context in which the TF role is under-resourced. For example information on quality, accuracy and error correction, average response time, challenge rate, distribution by language, content type and territorial scope, as well as a specific section on the impact of the Trusted Flagger's work on the protection of fundamental rights and on the monitored content and expressions regarding affected communities were all highlighted as useful data points that can only be captured where resources allow. This once again highlights the need for secure, adequate funding so that TFs can perform their role to the highest possible standard.

1. Recommendation: The TF role must be properly funded, with such funding guaranteed by the Commission. This could include a Commission-administered collective funding mechanism, financed through contributions from internet intermediaries, with funds allocated to Trusted Flaggers and monitoring

organisations. This model would ensure sustainable resourcing while preserving the operational independence of recipients by avoiding direct platform funding. While resources are limited, the Guidelines should set out required data points and additional, second tier data points that should be captured where there are adequate resources.

The Guidelines fail to recognise the vital role played by TFs in protecting core democratic values. The Network is surprised to see that the guidelines emphasises onerous application, suspension and revocation rules and procedures without recognising the added value of the Trusted Flagger mechanism and status, acknowledging the important role Trusted Flaggers play in addressing illegal hate speech online and for the broader content moderation and hate response system. Connected to this, **the guidelines are insufficiently anchored in fundamental rights including those set out in the EU Charter and European Convention on Human Rights**, including the right to freedom of expression, balanced with the right to protection from abuse and discrimination. It is also unclear how the guidelines would prevent commercial entities that can be designated as Trusted Flaggers from charging victims or victim support organisations for services related to the submission, follow-up, or handling of reports of illegal hate speech.

2. Recommendation: The guidelines should reflect **the TF role as anchored in the rights, values and norms of the EU Charter and European Convention on Human Rights**, including the right to freedom of expression, balanced with the right to protection from abuse and discrimination. The guidelines should prevent commercial entities designated as Trusted Flaggers from charging victims or victim support organisations for services related to the submission, follow-up, or handling of reports of illegal hate speech. More specifically the Guidelines should highlight the purpose, impact, and added value of the Trusted Flagger mechanism and status. The well documented impact of the '[shrinking space](#)' on CSOs should be acknowledged and measures strengthened to support CSOs-which are also TFs-which are under pressure, and are at the frontline of efforts to [protect our democracies](#).

There is a theme of power imbalance and platform unaccountability throughout the guidelines. The guidelines set out in detail how TFs are to be regulated, while imposing generic, unenforceable expectations on platforms. For example, there is no requirement for proof of platform decision-makers' expertise, no duty to give reasons for dismissing notices, no sanctions or TF recourse for inadequate platform channels, and no monitoring of platform misconduct towards TFs. Another example provided in the table below is the misleading practice during the onboarding process, of asking designated Trusted Flaggers to sign a cooperation agreement in order to be able to exercise their role under the DSA.

3. Recommendation: The Commission should release specific and detailed guidelines regulating platform accountability, including in relation to the TF roles and organisations. Paragraph 73 should clearly state that providers of online platforms should refrain from requiring Trusted Flaggers to sign a cooperation agreement in order to exercise their TF role.

There is confusion and lack of guidance on the relationship between law enforcement and TFs. On the technical side, this leads to a risk to **evidence preservation**. For example, 'removal "without undue delay"' can destroy evidence and undermine police investigations. In relation to the rule of law, there is potential for and evidence of confusion regarding the fundamental question of **who determines illegality**. For example, the process of defining notice "inaccuracy" by whether content "is not illegal"

presumes that a platform's judgment is correct. However, neither TFs nor internet intermediaries have the final authority to determine legality. These issues are compounded by national law vs EU taxonomy mismatches, differing MS laws (e.g. LGBTQAI+ incitement, Holocaust denial), divergent platform standards, and unresolved geo-blocking questions. Connected to this while criminal offences and the requirement for platforms to inform law enforcement or judicial authorities is mentioned, the Guidelines appear to be selective as to which types of criminal offence should be reported, for example only specifying those involving "a threat to the life or safety of a person or persons". Other types of conduct are also criminalised under the Framework Decision, and the reporting obligation should reflect this.

4. Recommendation:

- a. Produce clear guidance regarding back-up copies before deletion, temporary storage of removed content for at least six months to enable judicial redress.
- b. Clarify rules and guidelines on TF–police coordination, as well as DSC-police coordination, and reporting all content that is criminal under EU and national law to law enforcement, not only where there is a threat to life/safety threats.
- c. Connect and collaborate with the newly established [Network on law enforcement contact points specialised on hate speech and hate crime](#), co-facilitated by Facing Facts, CEPOL and Europol to ensure regular law enforcement input at the EU level as these guidelines and other key elements of the DSA are implemented
- d. Ensure that a similar process is put in place for relationships and engagement between TFs and out-of-court settlement bodies.
- e. The table below proposes subsection 5.2 is amended to the effect that providers of online platforms should temporarily store content that was removed from their platform, or to which access was restricted, as a consequence of a notice submitted by a Trusted Flagger. This would enable additional judicial redress against the content to which the notice referred (currently, the removal of content or the restriction of access often creates difficulties in the context of judicial redress, as it is no longer possible to view the content in question). The content should be stored for a period that sufficiently enables individuals to pursue judicial redress — at least six months.

The guidelines contain relatively limited references to criminalised hate speech and its linguistic and coded diversity despite being - for some TFs - a core activity area. Community-based TFs have unique knowledge on coded/context-dependent language, and only limited reference to this diversity reduces the likelihood that these skills are valued and sought.

5. Recommendation: coded/context-dependent language should count as "particular expertise"; contextual assessment criteria and mechanisms are needed to ensure equal monitoring across communities, protected grounds and languages (including non-EU languages).

Network members are very concerned about the **linked risks of 1. particular organisations obtaining TF status with the aim of target minority or civil society content; and 2. platforms weaponising Article 22(6) allegations to chill TFs who expose their moderation failures.** The guidelines do not contain explicit safeguards, specific consequences for bad-faith allegations, details on due process (access to file, reasoned decisions, judicial review) or clear rules on automatic suspension.

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6. Recommendation: revised guidelines should include guidance on minimising these risks including on specific consequences for bad-faith allegations, details on due process (access to file, reasoned decisions, judicial review) and clear rules on automatic suspension.

While the guidelines appear to highlight the added value of training and capacity building, the planning and resources allocation process is unspecified,

Understanding and responding to online hate is a fast-paced context, requiring skilled and supported responses, including by TFs. Such training are best framed as mutual knowledge exchange, across key actors in national and EU hate response systems, and ‘top-down’ DSC training is best avoided. **Facing Facts Online, the EU-Funded Network’s online learning platform runs comprehensive and positively evaluated programmes that can be adapted to the TF role, also facilitating cross-country and multistakeholder exchange.**

7. Recommendation: the guidelines and accompanying implementation efforts should draw on the existing and Commission-funded [Facing Facts Online programmes](#), with relevant support and input from DG CONNECT. Additional suggestions from members include organising annual multi-stakeholder forums and ensuring regular and active DSC engagement with civil society. The Commission is invited to add a footnote citing the Facing Facts Online course as an example of relevant training, and to consider allocating budget — for example through DG CONNECT — to fully sponsor Trusted Flaggers and monitoring reporters to attend Facing Facts Online courses.

Simple changes, based on direct and real-world experience would greatly improve the effectiveness of the guidelines. For example, members have specific feedback on the limitations of the reporting templates, along with specific suggestions for improvement. Another practice-based suggestion is that platforms should allow a Trusted Flagger to report a conversation as a whole. In many cases, someone posts inflammatory content under which hundreds of comments are posted. Where a large number of these are illegal, reporting comment by comment is very burdensome. In such cases, the platform should provide the possibility to report a large number of comments together and then review the conversation as a whole.

8. Recommendation: introduce framework for exchange facilitated by the Commission and ensuring equality of engagement and response in which TFs can share challenges and suggestions for improvement and Platforms evidence that suggested have been taken into account and addressed.
9. Recommendation: Connected to this, the Guidelines should support the creation of structured communication frameworks — such as regular cross-country meetings or coordination mechanisms — through which Trusted Flaggers in different Member States can compare experiences and investigate why and if removal success rates differ between countries. This would also help identify discrepancies in how platforms apply priority processing across national contexts.

The Commission should facilitate, at least once a year, an open and transparent multi-actor Forum on the functioning of the Trusted Flagger mechanism, with balanced participation from competent authorities, platforms, Trusted Flaggers, civil society organisations and independent experts. The Forum's conclusions should be published and should take into account the mechanism's impact on fundamental rights and its effectiveness in detecting criminal hate speech.

Part II: Table of detailed feedback

This table presents direct feedback from Facing Facts Network members.		
SECTION: 1. INTRODUCTION		
GENERAL COMMENTS ON SECTION The application of these Guidelines shall be interpreted and implemented in accordance with the Charter of Fundamental Rights of the European Union, in particular the rights to freedom of expression and information, freedom of association, non-discrimination, respect for private and family life, protection of personal data, and effective judicial remedy. Any measure adopted within the framework of the trusted flagger mechanism shall respect the principles of legality, necessity, proportionality, sufficient justification, and minimum interference. Hate speech concept needs to look at the elements of 1. (potential) harm at the individual, group and societal levels, and may be illegal under local or international law (administrative, civil or criminal). These harms must be recognised and effectively addressed based on a victim-centred approach; 2. discrimination on (real or perceived) identity characteristic(s) of the person or group; 3. engagement of the right to be protected from targeted abuse and the right to freedom of expression.		
Draft Trusted Flagger Guidelines	Comment:	Cross Reference
Paragraph 3.	Processing of notices should not remove evidence of a potential criminal offence before police or other authorities can access or capture it.	Links to Intro Paragraph 4; Content-storage proposal at Paragraph 73/Section 5.2; Paragraph 85 (reporting offences).
Paragraph 4.	"Without undue delay" can undermine police investigations; formal agreements are needed so removal does not pre-empt investigations. Law enforcement reports that platforms "freeze"/save content once notified by police. Something similar should apply to TF notices — a back-up copy should be created for law enforcement before	Links to Intro Paragraph 3; Paragraph 73 (storage proposal); Paragraph 85

	deletion. See proposal (Paragraph 73) that platforms temporarily store removed/restricted content for at least six months to enable judicial redress. It should also be noted that screenshots are not always accepted as proof in judicial proceedings, which reinforces the need for platforms to secure evidence; this should be aligned with ongoing work on electronic evidence. Clear guidance is needed on the procedure to follow where flagged content may form part of a criminal case, bearing in mind that most affected persons primarily seek removal of the content rather than criminal proceedings.	(Art 18 reporting); Paragraph 90 (post-decision monitoring).
Paragraph 5.	It would be useful to understand motivations for refusing TF status — condition (c) (diligent, accurate, objective) in particular can be judged in a rather subjective way.	Links to Paragraph 99 (accuracy definitions); Paragraph 109 (procedural safeguards); Paragraph 18 (reassessing rejections).
Paragraph 6.	The wording "...ensuring that the fundamental rights of the recipients of the service..." should be complemented with "including the right to protection from abuse and discrimination". In addition, while the DSA requires platforms to recognise notices submitted by certified trusted flaggers within their area of expertise and treat them with priority, this should not mean that ordinary notices are taken less seriously or treated with less diligence. Wording should be used that does not diminish the importance of ordinary notices.	Links to Paragraph 11 (Unia — no extended delays for regular users); Paragraph 80 (two-tier system risk); General Charter clause.
Paragraph 8.	The Guidelines contain very few explicit references to hate speech as a category of illegal content, despite it being a significant area of trusted flagger activity. The Guidelines make only a brief mention of coded language — a key challenge in detecting online hate speech — and trusted flagger expertise in recognising coded or context-dependent hateful content should be explicitly acknowledged as a form of "particular expertise" under Article 22(2)(a). Furthermore, the number of trusted flagger notices remains extremely low compared to the volume of notices submitted by	Links to Paragraph 60 (equal monitoring across communities); Section 5 general

	regular users (approximately 0.1% of total notices); while the Introduction acknowledges this, the Guidelines do not reflect on what this means for the mechanism's actual impact.	(contextual assessment text); General comment (added value).
Paragraph 11.	The reference to illegal content should include the new offence of cyber harassment and incitement to hatred or violence under the Directive on combating violence against women and domestic violence, as well as any equivalent new offence for online hate. Priority treatment of the notices submitted by TFs should not amount to extending delays in responding to regular users' submissions. The determination of whether content constitutes illegal content should be made exclusively on the basis of applicable national or Union law; in any case, the interpretation and application of the rules on illegal content must take into account the context, the public interest in the content, the potential impact on affected communities, and the risk of discrimination. Further guidance is also needed on the territorial scope of restrictions (related to geo-blocking), clarifying the relationship between content that violates EU law, content that violates the law of one or more Member States, and content that violates platform community standards, which should be removed from the platform across all EU Member States.	Links to Paragraph 78(d) (MS-level illegality); Paragraph 75 (taxonomy mapping); Paragraph 99 (accuracy = legality problem); Paragraph 80.
Paragraph 12.	There are significant problems with the transparency of notifications and decisions in the EC Statements of Reasons database [https://transparency.dsa.ec.europa.eu/statement]. For example, a search for notices on four major platforms where the language of the content is Romanian, for the period 1 January 2025 to 1 July 2026, returns zero results — despite at least one Trusted Flagger in Romania having submitted around 100 such notices, roughly half of which resulted in the content being restricted in one form or another. If such records are missing, this leads to incorrect statistics on decisions concerning Romanian-language content and on Trusted Flagger notification work, and to significant incongruence between the data reported by Trusted Flagger in their annual reports and the data available in the Statements of Reasons database. This may equally affect other, especially "non-dominant", languages. There is no legal justification for informing the affected recipient of the service that a restriction was taken pursuant to a notice submitted by a Trusted Flagger; the DSA imposes no such obligation. Given the sensitive position of Trusted Flaggers, sharing information about their activities with	Links to the good practice box below Para 12 (exposure concern); Para 131 (visual identity exposure); Annex II (reporting misalignment with SoR data).

		affected users could raise unnecessary safety or privacy concerns, and the Guidelines should not impose obligations beyond the scope of the DSA. Should this requirement nevertheless remain, platforms should disclose only that a Trusted Flagger submitted the notice, without revealing the specific identity of the entity.	
Good Practice Box		The good practice example refers to content "falling within the area of expertise of the trusted flagger". It should also specify that the provider not only needs to ensure that the content is removed, but should internalise the content and expression in its content moderation systems so that the same content does not reappear to users. In addition, notifying the recipient that content was removed as triggered by a trusted flagger notice risks exposing the trusted flagger unnecessarily. Clarification is needed on the process involved in "diligently and objectively assessing" notices — for example, whether this includes legal support or liaison with police.	Links to Paragraph 12 (statements of reasons); Paragraph 77 (legal assessment by platforms); Paragraph 13 (systemic gaps).
Paragraph 13.		It is positive that it refers to systemic gaps and systemic risks; however, definitions of these terms are needed.	Links to general comment (platforms' proactive role); Arts 34–35 DSA.
Paragraph 14.		The Guidelines do not aim to interpret Articles 34 and 35 of Regulation (EU) 2022/2065, clarification is needed as to whether separate guidelines are foreseen for these provisions. The relationship between the Trusted Flagger mechanism and the systemic risk framework under Articles 34 and 35 deserves particular attention: content that can be found on internet intermediaries is harmful and not always passes the threshold of illegality, and its amplification through recommender systems — including patterns of coordinated extremist organisations and the algorithmic promotion of hateful content into users' feeds — constitutes a systemic risk that the Guidelines do not address.	Links to general comment (platforms' proactive role); Arts 34–35 DSA.
Paragraph 17.		The Guidelines should be drafted with explicit awareness that they may be integrated into national law by Member States. While non-binding at EU level, the current language could be transposed into binding national frameworks. This perspective should inform the level of precision and legal clarity throughout — particularly on the definition of independence, reporting obligations, and the scope of Trusted Flagger activities.	Links to Paragraph 35(b) (independence vagueness); Section 6 (reporting); General (national

			adoption).
Paragraph 18.	<i>“...If evidence suggests that entities that have, before adoption of these guidelines, been awarded the status of trusted flagger do not meet the conditions...”</i> A provision needs to be added on reassessing rejected applications as well.		Links to Paragraph 5 (subjectivity of criteria); Paragraph 109 (procedural safeguards).

SECTION: 2. SCOPE AND STRUCTURE OF THE GUIDELINES

GENERAL COMMENTS ON SECTION

A reordering of the points in this section is proposed. The section currently opens, in effect, with the conditions for suspension or revocation of trusted flagger status. This matters also in terms of the message conveyed to platforms: suspension and revocation should not be the first signal the Guidelines send about the trusted flagger role.

The Commission and the DSCs need to promote stable mechanisms for civil society participation, including human rights organizations, entities specializing in freedom of expression, representative organizations of groups affected by hate speech, and independent academic actors, in order to periodically review the functioning of the trusted flagger mechanism, detect structural biases, and formulate public recommendations.

Draft Trusted Flagger Guidelines	Comment:	Cross Reference
Paragraph 20.	The Commission and the Digital Services Coordinators should promote stable mechanisms for civil society participation — including human rights organisations, entities specialising in freedom of expression, representative organisations of groups affected by hate speech, and independent academic actors — in order to periodically review the functioning of the Trusted Flagger mechanism, detect structural biases, and formulate public recommendations.	Links to Section 7 and Paragraph 99 (misuse reporting); Paragraph 109

	It is important to acknowledge and address the potential misuse of this mechanism. In particular, there is a risk that a VLOP could use allegations of submitting "imprecise or inadequately substantiated notices" strategically to undermine or hinder a trusted flagger in the exercise of its mandate. The Commission should therefore clarify that appropriate safeguards exist against such misuse. In particular, where an investigation concludes that allegations made by a VLOP were unfounded or made in bad faith, there should be appropriate consequences. Given the risk that VLOPs may instrumentalise this possibility of requesting the revocation of Trusted Flagger status, there should be an obligation to hear the Trusted Flagger concerned before any suspension. Platforms frequently refuse to remove content because they do not understand the references made by the author of hate speech to a local context. Without such safeguards, there is a legitimate concern that VLOPs could submit complaints against Trusted Flaggers that systematically identify shortcomings in the platform's content moderation practices or repeatedly report instances of non-compliance. This could create a chilling effect on the independent exercise of the Trusted Flagger function and ultimately undermine the effectiveness of the mechanism established under Article 22.	(procedural safeguards); Paragraph 131 (multi-stakeholder forum).
Paragraph 24.	Regarding the reference to Section 7 setting out guidance on "safeguarding the integrity of the trusted flagger status", it should be ensured that this also addresses the safety of Trusted Flaggers themselves.	Links to general comment (3); Paragraph 12; Paragraph 131.
SECTION: 3. AWARDING THE TRUSTED FLAGGER STATUS		
GENERAL COMMENTS ON SECTION In assessing the independence requirement, Trusted Flaggers (TFs) should examine not only the formal existence of financial or contractual links with platform providers, but also any circumstances that could create material, functional, reputational, or strategic dependence. In particular, when the applicant operates in sensitive areas, including hate speech, digital violence, or the protection of vulnerable groups, the competent authority should require a strengthened declaration of the absence of conflicts of interest and a detailed description of the internal safeguards adopted. The Guidelines should clarify the relationship between the Trusted Flagger status under Article 22 and the role of Monitoring Reporters under frameworks such as the Code of Conduct (+), as many organisations operate under both, and the distinction between the two roles, their respective channels and their legal effects is currently unclear. A comparable inconsistency arises in relation to the Code of Conduct		

on Disinformation (integrated into the DSA framework as of 1 July 2025). The Code expressly provides for fair financial contributions from platforms for their work. This disparity should lead to a recalibration of the obligations imposed on DSA Trusted Flaggers, in particular on independence and platform funding.			
Draft Trusted Flagger Guidelines	Comment:	Cross Reference	
Paragraph 27.	The statement that Trusted Flaggers may accept notifications from individuals and submit them as Trusted Flaggers notices raises important operational considerations. In particular, the Commission should encourage discussion on appropriate safeguards for Trusted Flaggers, which may otherwise become recipients of large volumes of irrelevant, abusive or potentially harmful submissions, including highly sensitive or illegal material (e.g. CSAM). This creates operational, legal and staff protection challenges that should be acknowledged in the guidance. The Commission should also consider supporting or promoting a coordinated communication and user guidance strategy at EU level, informing users how and when to report illegal content to Trusted Flaggers in their respective Member States. Clear guidance on the appropriate use of Trusted Flaggers reporting channels would help reduce misuse, improve the quality of submissions, and better protect the capacity of trusted flaggers to fulfil their role effectively. This work needs to be coordinated with DSCs and with the EU-Funded Facing Facts Network and other Network organisations and CSOs working in the EU.	Links to general (3) (psychological burden); Section 9 (ecosystem support).	
Paragraph 30.	The Guidelines do not adequately address the risk of extremist organisations applying for and obtaining Trusted Flagger status. Such entities could exploit the mechanism to flag legitimate content from minority groups or civil society, seriously damaging the reputation and integrity of the Trusted Flagger system and the wider hate speech response system. The Guidelines — possibly under Section 9 on ecosystem support, or Section 7 on safeguarding integrity — should include explicit safeguards or due diligence criteria to prevent ideologically motivated misuse of the Trusted Flagger mechanism. A reference defining "conflict of interest" should be included.	Links to Paragraph 35(b) (independence); Section 7 (integrity); Paragraph 20 (misuse in the other direction).	
Paragraph 32(c).	This provision could be problematic to the extent that private companies could apply for Trusted Flagger status and then request remuneration for their services from users. While this may be	Links to Paragraph 35(b) (commercial	

	beneficial in some cases — for example, law firms wishing to support their clients — the Guidelines should specify that such services should not be compensated by the victim or user concerned.	interests and higher scrutiny).
Paragraph 33(a).	Continuous training supports this requirement (point (e)), and the Facing Facts Online courses are an example of training that does so, mostly as the programmes and online courses offered by the Facing Facts Network are already funded by the EC through the FPA, which are essential for the well-functioning of the DSA and the hate speech response system. The Commission is invited to add a footnote citing the Facing Facts Online course as an example of relevant training, and to consider allocating budget — for example through DG CONNECT — to fully sponsor Trusted Flaggers and monitoring reporters to attend Facing Facts Online courses.	Links to Annex I s.3; Paragraph 134 (training/knowledge exchange); Section 9 general (Facing Facts Online training programmes).
Paragraph 35(b).	The concept of "independence" in this section urgently needs greater clarity. As currently drafted, it is too vague and open to interpretation. In particular, much clearer guidance is needed on what types of cooperation, collaboration or funding from platforms would or would not compromise independence — including from the perspective of smaller CSOs that may receive minimal platform support for legitimate capacity-building purposes. The current guidance on how Digital Services Coordinators should assess whether funding undermines "diligence and objectivity" (including the poor practice example in the Guidelines) does not reflect operational reality: one organisation investigated whether receiving less than 2% of its annual budget from platforms would compromise its independence, and found that even this minimal funding would prohibit any form of counter-service (e.g. providing training to the platform). The Guidelines need to clearly define what constitutes acceptable versus unacceptable platform funding, and what activities remain permissible.	Links to Paragraph 30 (conflict of interest definition); Paragraph 133 (collective funding proposal); Annex II Part II (independence reporting); Paragraph 17 (need for precision if transposed).
Paragraph 45.	A point of nomenclature: the notice and action mechanism is one that platforms are obliged to set up for all users to report illegal content. Trusted flaggers contribute within this strand by flagging illegal content, but the general mechanism is available to all users. The reasoning throughout the Guidelines should reflect this.	Links to Paragraph 80 (two-tier concerns); Paragraph 6.
Paragraph 48.	Forms, guides and contact channels must be available in plain language and, where possible, in	Links to Paragraph 54

	several EU languages, with particular attention to digital accessibility and to the participation of small, community-based and specialised entities in underrepresented fields.	(administrative burden); Annex I (language coverage).
Paragraph 54.	For smaller organisations, the administrative burden of applying for and maintaining Trusted Flagger status is disproportionate. Several organisations are actively considering not applying because the obligations — reporting, strict independence criteria, and interaction with Digital Services Coordinators — are likely to tie up their operations without sufficient institutional support. The Guidelines should include provisions to reduce administrative barriers for small CSOs.	Links to Paragraph 48 (accessibility); Paragraph 92 and Annex II (reporting burden); Paragraph 133 (funding); General (2).
Paragraph 60.	This provision falls short in addressing communities' concerns about over- and under-representation, and in ensuring that all minority and minoritised communities receive equal monitoring services across the EU. Good practice should be to monitor conduct that is criminal under the Framework Decision on combating racism and xenophobia, as well as gender-based cyber violence, applied across protected grounds including antisemitism, anti-Muslim hatred, anti-Roma hate, anti-Asian Racism, disability and LGBTQAI+.	Links to Paragraph 8 (hate speech references); Section 5 general; General comment (4).

SECTION: 4. NOTIFICATION OF TRUSTED FLAGGERS TO THE COMMISSION

GENERAL COMMENTS ON SECTION

The public database of trusted flaggers shall include, in addition to the data already required, the area of expertise, the date of granting, suspension, or revocation, and a non-confidential summary of the criteria applied in reaching the decision.

The Trusted Flaggers shall publish aggregated and comparable statistics on applications received, granted, denied, suspended, and revoked, as well as the main reasons for each category of decision, while protecting personal data and duly justified confidential information.

SECTION: 5. SUBMISSIONS AND PROCESSING OF NOTICES			
GENERAL COMMENTS ON SECTION With regard to unlawful hate speech, platforms and trusted flaggers must consider the communicative context, repetition, discriminatory intent, power imbalance, cumulative effect on protected groups, and the possible use of coded or indirect language. The assessment must incorporate specific training on anti-Black Racism, anti-Gypsyism, antisemitism, anti-Muslim hatred, LGBTQIA+phobia, anti-Asian racism and other forms of discrimination recognised by applicable law.			
Draft Trusted Flagger Guidelines	Comment:		Cross Reference
Paragraph 70.	This clarification is welcomed. However, it should also extend to a duty not to exacerbate risk to Trusted Flaggers — and, ideally, a duty to protect them. In practice, platforms have repeatedly requested personal details of the individual staff members submitting notices. This practice significantly undermines the reporting process and raises severe employee data security concerns. The following example of poor practice is suggested: "A platform mandates the submission of an employee's full name and ID numbers as a mandatory prerequisite for submitting a notice from a Trusted Flagger appointed organisation."		Links to Paragraphs 86–88 (onboarding obstacles, private data demands); General (3).
Paragraph 73.	From a systematic point of view, this provision does not fit within subsection 5.1, as it does not concern the onboarding of Trusted Flaggers; it should instead be included in the poor practice box below Paragraph 85, which already addresses, inter alia, unnecessarily strict character limits and the unreasonable use of CAPTCHA or other bot protection measures. Paragraph 73 should clearly state that providers of online platforms should refrain from misleading practices during the onboarding process, such as asking designated Trusted Flaggers to sign a cooperation agreement in order to be able to exercise their role under the DSA. In addition, a new paragraph is proposed for subsection 5.2, to the effect that providers of online platforms should temporarily store content that was removed from their platform, or to which access was restricted, as a consequence of a notice submitted by a Trusted Flagger. This would enable additional judicial redress against the content to which the notice referred: currently, the removal of		Links to Intro Paragraphs 3–4 (police evidence); Paragraph 85 (poor practice box); Paragraph 90 (post-decision monitoring).

	content or the restriction of access often creates difficulties in the context of judicial redress, as it is no longer possible to view the content in question. The content should be stored for a period that sufficiently enables individuals to pursue judicial redress — at least six months.	
Paragraph 77.	This paragraph illustrates a central imbalance: Trusted Flaggers carry out the work and also risk their status if they make mistakes, with no clarity on how many alleged inaccuracies would lead to revocation. Platforms should also make clear whether they have removed the content or merely disabled access to it within the EU or Member State. Moreover, while Trusted Flaggers have particular areas of expertise and can be expected to meet high standards of completeness and accuracy within those areas, the ultimate decision to act on a submitted notice on grounds of illegality always lies with the provider of the online platform. It must therefore be clear that the assessment of notices by providers of online platforms always has to include a legal assessment by sufficiently trained staff. An amendment is suggested to this end, clarifying that providers of online platforms have to perform a legal examination — albeit possibly a less extensive one than in the case of typical notices submitted by regular recipients of their services.	Links to Paragraph 99 (accuracy definitions); Paragraph 81 (consequences of platform inaction); Paragraph 11 (geo-blocking position).
Paragraph 78(c).	Platforms should also allow a Trusted Flagger to report a conversation as a whole. In many cases, someone posts inflammatory content under which hundreds of comments are posted. Where a large number of these are illegal, reporting comment by comment is very burdensome. In such cases, the platform should provide the possibility to report a large number of comments together and then review the conversation as a whole.	Links to good practice box after Paragraph 78 (bundled URLs); Paragraph 88 (per-link outcomes).
Paragraph 78(d).	Clarification is needed on the scope of illegality underpinning Trusted Flagger activity. The understanding was that the DSA — and therefore Trusted Flagger activity — is limited to content that is illegal under EU law, as implemented by national law (i.e. the types of conduct that the Framework Decision intends to criminalise). The reference to content that is "illegal in one or multiple specific Member States" suggests something broader. In practice, Trusted Flaggers work mostly on the basis of national laws: incitement to hatred against LGBTQAI+ people, for example, is not prohibited at European level. There is also the issue that some platforms apply a different — sometimes higher (ICCPR, for example) — threshold in their own content moderation systems. Clear guidance is needed on these points.	Links to Paragraph 11 (geo-blocking; illegality text); Paragraph 75 (taxonomy); Paragraph 99 (whose judgment prevails).



Paragraph 80.	There is a risk of creating a two-tier system in which the rights of regular platform users are effectively deprioritised in favour of Trusted Flagger notices. The Guidelines should explicitly affirm that the Trusted Flagger mechanism should not result in different treatment of regular users' notices. Notifying illegal content should not be more restrictive for Trusted Flaggers than for other recipients of the services under Article 16 of Regulation (EU) 2022/2065, or for partners in the framework of voluntary cooperations — all the more so considering that Trusted Flagger notices represent a much smaller overall share compared to those of regular users, due to limited capacity, meaning that regular users likely produce the bigger overall impact. A related risk concerns the potential deprioritisation of notices concerning violations of community standards or harmful speech as a result of the prioritisation of illegal content notices.	Links to Paragraph 6; Paragraph 11 (Delays); Paragraph 8 (0.1% volume).
Paragraph 81.	The Guidelines lack sufficient structure on the effects and consequences when a platform decides not to take down or restrict content flagged by a Trusted Flagger. There is no clear guidance on what recourse Trusted Flaggers have, what feedback they should receive, or how platforms should justify inaction. This gap undermines the accountability of the mechanism. Moreover, it is unclear what mechanisms are available when the TF appeals the platform's decision to a third party (Out-of-court dispute settlement bodies) which decides that the TF was right, but the platform still refuses to change its decision and take any measures. A mechanism that ensures the transparency of the appeals mechanism and platforms' reactions should also be put in place, so as to have a clear tracking of the entire process. To our knowledge, at the moment there is no clear communication record between TF - third party - platform to properly track the evolution of the disputes and what happened with the posts. Additionally, we find cases where the platform disagrees with the TF's notification and decides to leave the content public, but after a while, the content disappears, and there is no transparency on the reason for the disappearance. If the platform did, at a different point in time, remove the content, despite the negative decision given to the TF notice, this could imply that the platform's initial decision was wrong. Not having a transparent tracking of such decisions regarding notified posts creates challenges in TF's reporting regarding platform responses, and can also create a distorted image regarding the 'accuracy' of TF notices.	Links to Paragraphs 88 (information access); Paragraph 90 (appeals); General (1) (no reasons for dismissals).
Paragraph 85.	This paragraph mentions criminal offences and the requirement for platforms to inform law enforcement or judicial authorities, but appears to be selective as to which types of criminal offence should be reported — only those involving "a threat to the life or safety of a person or persons". Other types of conduct are also criminalised under the Framework Decision, and the reporting	Links to Intro Paragraphs 3–4; Paragraph 73 (evidence

		obligation should reflect this.	storage); Art 18 DSA.
Paragraph 86.	These paragraphs are important because they turn to the responsibility of platforms and the mechanisms they should implement. However, they are formulated very generically, more as recommendations, without any mention of the sanctions that could be applied if platforms fail to comply, or at least of the mechanisms available to Trusted Flaggers to address inadequate channels or responses — including persisting obstacles in onboarding created by some platforms, for example by requiring accounts to be created using individual private data, which would go against the protection of personal data belonging to the people carrying out Trusted Flagger work.		Links to Paragraph 70 (personal data); Section 6 and Annex II (reporting); Paragraph 78(c) (bulk notices); Section 9 general (no sanctions on platforms).
Paragraph 88.	Such access is also useful for the preparation of Trusted Flaggers' annual reports. The list should additionally include the content of the notice submitted (rationale and legal basis) — in effect, a full copy of the form submitted. Where more than one link is submitted at a time, the outcome should be specified link by link.		
Paragraph 90.	The Guidelines do not address what happens when the author of flagged content appeals or contests a platform's takedown decision. It is unclear whether Trusted Flaggers are notified of such appeals, whether they are given the opportunity to respond, or whether platforms are required to re-check the availability of the content after an appeal is resolved. The mechanism should ensure continuous monitoring in an accessible and clear way of whether flagged content remains offline.		Links to Paragraph 81 (consequences of inaction); Paragraph 73 (content storage and redress).
SECTION: 6. REPORTING REQUIREMENTS			
Draft Trusted Flagger Guidelines	Comment:		Cross Reference

Paragraph 92.	Facing Facts Network members identified the tension between the benefits of gathering and presenting detailed data in TFs annual reports and the challenge of an added burden that might not be possible for smaller, less resourced TF organisations. For example indicators of quality, accuracy and error correction, average response time, challenge rate, distribution by language, content type and territorial scope, as well as a specific section on the impact of the Trusted Flagger's work on the protection of fundamental rights and on the monitored content and expressions regarding affected communities. This once again highlights the need for secure, adequate funding so that TFs can perform their role to the highest possible standard. The Guidelines should distinguish between a core set of mandatory data points and a second tier of supplementary information to promote consistency while allowing flexibility where appropriate. They should also establish a framework for ensuring adequate, sustainable, and secure funding to support the effective performance of the Trusted Flagger role.	Links to Annex II general (template concerns); Paragraph 54 (small CSO burden); Paragraph 133 (funding).
SECTION: 7. REPORTING REQUIREMENTS		
Draft Trusted Flagger Guidelines	Comment:	Cross Reference
Paragraph 99.	The Guidelines state that Trusted Flagger status can be withdrawn where a provider of online platforms has information indicating that a Trusted Flagger has submitted a significant number of insufficiently precise, inaccurate or inadequately substantiated notices, with inaccuracy defined as "the content notified is not illegal". This is problematic: neither the platforms nor the Trusted Flaggers have the authority to determine whether content is illegal — only the authorities responsible for enforcing the law have such a role. Both the Trusted Flagger and the platform make decisions based on their own judgment and interpretation of the law, which is always subject to a degree of subjectivity. Actual legality therefore cannot serve as an indicator of potential misreporting by Trusted Flaggers. In addition, "significant number" is very generic, and it is not clear how this determination is made. The comparison between allegedly inaccurate notifications and the total number of notifications implies that the evaluation is made on the assumption that the platform's response is the correct one — which may not be the case, especially considering that different platforms sometimes make	Links to Paragraph 77 (platform legal assessment); Paragraph 5 (subjective criteria); Paragraph 75 and 78(d) (national context); Paragraph 20 (bad-faith platform)

	very different decisions on similar notified content. As drafted, these paragraphs suggest that where a platform considers reported content not to be illegal while the Trusted Flagger believes it is, the platform is presumed to have the better judgment, while no mechanism is proposed for evaluating the judgment of the platforms. It should also be noted that some entities, such as the Meta Oversight Board, apply ICCPR standards rather than national law. Regarding indicator 100(f), which stipulates comparisons with other Trusted Flaggers in the same area of expertise: such comparisons may be misleading if other factors are not also considered, such as national context and meaning. For example, platform decisions may differ between reports concerning antisemitism in Romanian-language content and in English- or German-language content. With respect to paragraph 99(c), the Guidelines should clarify who is responsible for determining the illegality of content, the legal framework under which such assessments are made, and how these assessments relate to existing content moderation policies, which do not always reflect EU or national law.	allegations); Paragraph 109.
Paragraph 109.	Any investigation, suspension or revocation of Trusted Flagger status shall be subject to explicit justification, sufficient access to the file, the possibility of submitting arguments within a reasonable timeframe, and effective review of the decision by the competent authority or national courts. Automatic suspension should only be applied where there is serious, concrete and properly documented evidence of serious non-compliance, and must be reviewed periodically during the investigation.	Links to Paragraph 20 (consequences for bad-faith allegations); Paragraph 99 (evidential standards); Paragraph 18 (fairness).
Paragraph 123.	This provision presents platforms as reasonable entities with the ability to objectively "reassess" their cooperation, which does not reflect practice.	Links to general comment (imbalance; TFs sometimes targeted by platforms); Section 8.

SECTION: 9. SUPPORTING THE TRUSTED FLAGGERS ECOSYSTEM			
GENERAL COMMENTS ON SECTION The Guidelines should place greater emphasis on the governance and accountability of the Trusted Flagger mechanism as a whole. In particular, they should encourage Digital Services Coordinators to establish structured and regular engagement with civil society organisations and other relevant stakeholders to support the effective and rights-based implementation of the mechanism. At the same time, the Guidelines should provide greater clarity on the oversight of online platforms' obligations in relation to Trusted Flaggers. While they set out provisions for monitoring the conduct of Trusted Flaggers and, where appropriate, withdrawing their status, they should also clarify how compliance by platforms with their obligations towards Trusted Flaggers is monitored, assessed, and, where necessary, subject to enforcement measures.			
Draft Trusted Flagger Guidelines	Comment:		Cross Reference
Paragraph 131.	The indication that Trusted Flaggers "should adopt a clear visual identity signalling their status" is unclear as to what is expected and what the motivations are for developing a distinct visual identity, especially considering that many Trusted Flaggers carry out this work on an almost voluntary basis, without specific resources and funding, and as a side activity rather than as their primary daily work. In addition, such signalling can expose them to even more negative reactions and targeted hate — especially for Trusted Flaggers working on hate speech and hate crime. These exposure risks are not hypothetical: Trusted Flaggers have been publicly characterised as an "infrastructure of censorship" in coordinated campaigns seeking to delegitimise the mechanism, and staff of Trusted Flagger organisations have faced targeted hate and threats connected to their reporting work. In one case, a staff member from a DSA appointed Trusted Flagger was called as a witness in criminal proceedings arising from content the organisation had reported, with the consequence that the personal data became available to the accused. This should be a recommendation rather than a requirement, as the current formulation does not acknowledge the different realities and challenges that Trusted Flaggers face, and demands extra work and resources from them.		Links to Paragraph 12 (disclosure of TF involvement); Paragraph 20 (civil society review mechanism); Paragraph 99 (cross-country decision discrepancies).

	The Guidelines should support the creation of structured communication frameworks — such as regular cross-country meetings or coordination mechanisms — through which Trusted Flaggers in different Member States can compare experiences and investigate why and if removal success rates differ between countries. This would also help identify discrepancies in how platforms apply priority processing across national contexts. This work could be implemented under EU-Funded programs, such as Facing Facts Network and INACH Network activities. The Commission should facilitate, at least once a year, an open and transparent multi-actor forum on the functioning of the Trusted Flagger mechanism, with balanced participation from competent authorities, platforms, Trusted Flaggers, civil society organisations and independent experts. The forum's conclusions should be published and should take into account the mechanism's impact on fundamental rights and its effectiveness in detecting criminal hate speech.	
Paragraph 133.	The Guidelines encourage Trusted Flagger activity but do not create any corresponding obligation on Member States or the Commission to provide financial or operational support. This creates a structural imbalance: organisations are expected to meet stringent criteria and administrative obligations without guaranteed resources. Section 9 should be strengthened to include more concrete commitments on support. In this regard, the Commission needs to establish a collective funding mechanism — a fund to which internet intermediaries designated under the DSA contribute generically, without any link to specific Trusted Flaggers — to finance Trusted Flagger, monitoring reporters and monitoring activities without creating independence risks. Ultimately, it is the European Commission's responsibility to provide sustainable funding for Trusted Flaggers, as they provide a public service; the current monitor reporters funding is insufficient.	Links to Paragraph 35(b) (independence and platform funding; “no payment for this role”); Paragraph 54; Paragraph 92; Paragraph 134.
Paragraph 134.	The current wording may create the impression that Trusted Flaggers are operational implementers carrying out tasks that serve institutional objectives. If this is the intended approach, it further reinforces the need for the institutions to ensure that Trusted Flaggers receive appropriate and sustainable financial support to enable them to fulfil these public-interest responsibilities. In particular, the Commission should play a leading role in ensuring that such support is provided in consistent manner across the Union. In many cases, Digital Services Coordinators may not possess the specialised expertise required in the various fields of illegal content covered by Trusted Flaggers. The guidance could encourage	Links to Paragraph 133 (funding); Paragraph 33(a) (training providers); Section 9 general comment on DSC capacity.

	regular consultations and mutual knowledge exchange between DSCs, Trusted Flaggers, providers of online platforms and, where appropriate, independent third-party experts. This multistakeholder approach underpins the activities of the EU-Funded Facing Facts Network and its regular training programmes, delivered by Facing Facts Online. In addition, membership of the multistakeholder Facing Facts Network could be of great benefit to TFs and it should be actively promoted by EC and DSCs. Suggest adding Facing Facts Network activities funded by the EC under its Framework Partnership Agreement (2026-2028) and initiatives in the guidelines.	
ANNEX 1		
	The list of languages should be expanded to include other languages widely used within the EU, such as Arabic, Russian and Mandarin. Regarding Section 3 of Annex I, continuous professional development should also be identified as a component of expertise, possibly with a set minimum number of training hours to be followed. Suggest supporting EU-Funded Facing Facts Network activities and Facing Facts Online courses.	Links to Paragraph 48 (multilingual accessibility); Paragraph 33(a) (training as evidence of expertise).
ANNEX 2		
	The reporting template proposed in Section 6 raises concerns. As designed, it differs significantly from the way Trusted Flaggers currently conduct and structure their reporting. 1. It creates considerable additional administrative burden, which is especially problematic for smaller Trusted Flaggers; 2. It is unlikely to surface the underlying patterns and systemic problems that civil society practice actually reveals; 3. It does not match the operational reality of Trusted Flagger work. A more flexible, outcome-oriented template is needed. A question also arises as to whether the new Annex II reporting template applies retroactively to data already collected by Trusted Flaggers; if so, this would require a reworking of historical records, which could be a serious impediment to the activities of many Trusted Flaggers. The Guidelines must include a clear transitional clause specifying the date from which the new template applies, and confirm that data collected under previous reporting frameworks does not need to be restructured.	Links to Paragraph 92; Paragraph 12 (SoR data quality); Paragraph 54; Paragraphs 86–88 (access to information needed to report).

	Furthermore, the template significantly increases the workload of Trusted Flaggers, while platforms are not required to provide equally detailed data (for example, specific legal provisions, disputes or arguments), usually do not give reasons for their decisions, and produce publicly available Statements of Reasons that do not appear to reflect reality (see the comment on Paragraph 12). Several fields of the template do not correspond to the information actually available to Trusted Flaggers. As regards categories of illegal content, these data have not been systematically recorded to date, as such information has not previously been required. With regard to the legal basis invoked, platforms already request this information and Trusted Flaggers provide it; however, Trusted Flaggers do not receive a copy of the information submitted and are unable to access it afterwards (see the comment on Paragraph 88). As regards reasons for rejection, platforms generally provide only standardised and generic explanations, if any explanation is provided at all. In addition, the template should clarify how a Trusted Flagger should report cases where a platform has failed to respond to a notice within the relevant timeframe — a timeframe which should itself be specified. Similarly, the template should clarify how appeals, including those that are reported to DSA Out-of-Court Dispute Settlement Bodies, and their outcomes are to be reflected in the report, including whether they should be reported separately from the initial decision. At this stage, the request for such a detailed report seems excessive and may further decrease the motivation of actual or potential Trusted Flaggers to take on this demanding role. Finally, the template should include a section — for example as a drop-down menu alongside the category of illegal content — recording the type of harm and the community concerned by the reported content.	
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