



Annual Work Plan Q4/2025 to Q4/2026

Mission of the Board

As expressed in its [Mission Statement](#), the European Board for Digital Services (the “Board”) aims to contribute to a safe, predictable and trusted online environment that facilitates innovation and ensures the protection of fundamental rights, including freedom of expression and the right to information are effectively protected. The Board is a cornerstone for the consistent application of the Digital Services Act (“DSA”) within the European Union, for the benefit of all European citizens, and its society and economy. Through the Board, the European Commission and the Digital Services Coordinators (“DSCs”) cooperate as a cohesive team, taking a European approach to the enforcement of the DSA. In particular, the Board plays an important role in operationalising the means of cooperation among DSCs and with the European Commission provided by the DSA and works to facilitate their use.

The Board, supported by its Working Groups, is the forum to discuss all relevant issues and priorities regarding the application of the DSA. Close and trustful cooperation and coordination, while at the same time taking into account the specific effects of intermediary services in individual Member States, are indispensable for effective enforcement and consistent application of the DSA across the Union.

For this purpose, the Board supports, assists, and advises the Commission and the DSCs in their supervisory tasks, consults with external experts where necessary, and contributes to the analysis of emerging digital services issues across the single market.

Working priorities

For its second Work Plan covering the period from Q4/2025 to Q4/2026, the Board has adopted three thematic priorities and three horizontal priorities. This Work Plan builds on the Board’s activities and achievements under its [first Work Plan](#).

Thematic priorities

1. Boosting online safety for minors across the European Union

Protection of minors online is a core value and objective pursued by the Board. It has been a priority since the beginning as reflected by the ambitious [Guidelines of the Commission on the protection of minors](#) under Article 28 DSA and the launch of the coordinated action to reinforce the protection of minors as regards pornographic platforms. Further, the Board has continued the work of the Age Verification Task Force and provided input to the Commission’s initiative of a white label age verification blueprint.

The Board is committed to further advance the high level of privacy, safety and security that benefits young Europeans online. It will contribute to the monitoring of the online platforms' compliance with Article 28 DSA, and coordinate with the Commission an implementation strategy to ensure a high level of protection for minors online.

Additionally, the Board will continue its coordinated action to reinforce the protection of minors regarding pornographic platforms, including by mapping and identification of all relevant platforms, sharing of enforcement approaches, methodologies and best practices, particularly as regards the evaluation of the effectiveness of existing age assurance measures and their implementation by platforms.

After the adoption of the Commission's upcoming Action Plan on cyberbullying, the Board will discuss what providers of intermediary services can do to address this threat in accordance with the DSA. The Board will contribute to the upcoming inquiry by the Commission into the effects of social media on the mental health of minors. In addition, the Board stands ready to contribute to the work of the Panel of Experts on children and social media, announced by the Commission President.

2. Leveraging all DSA instruments to address illegal products and content more effectively

The Board will continue to support the enforcement of existing rules against illegal content online. A top priority is its action against online financial scams which cause significant harm to European citizens. The Board is tackling this issue as a matter of priority, across different platforms and making use of all relevant DSA tools. Central banks and other financial supervisory authorities, as well as consumer protection authorities and associations have a very important role in this context. Where appropriate, DSCs may award the status of trusted flagger to these and other relevant entities with the relevant expertise and meet the other requirements.

In addition, the tackling of other forms of illegal products and content online feature prominently on the Board's agenda. These include the distribution of child sexual abuse material and the sharing of non-consensual intimate material on social media, non-compliant goods on marketplaces, or pirated content. In this context, the Board will work on enhancing the effectiveness of notice-and-action mechanisms. Finally, illegal hate speech online will first be addressed via the voluntary [Code of Conduct on Countering Illegal Hate Speech Online +](#) whose integration into the DSA was endorsed by the Board. The Board will, with the Commission, monitor and evaluate the achievement of the code's objectives while acknowledging the importance of protecting freedom of expression.

To tackle these multi-faceted challenges, the Board has already reinforced its collaboration with other authorities to better coordinate efforts to identify and tackle illegal content. In addition, the DSCs had awarded the trusted flagger status, by the time of adoption of this Work Plan, to more than 40 organisations covering a wide range of areas of expertise related to illegal

content. Online platforms will now have to process the notices of allegedly illegal content submitted by these trusted flaggers with priority and decide upon its possible removal.

The Board will closely cooperate with the Commission on its future guidelines on trusted flaggers under Article 22 DSA. The upcoming guidelines should aim to ensure that trusted flaggers operate transparently, efficiently and coherently in reporting suspected illegal content to online platforms across the EU, and that fundamental rights are fully respected.

The Board will continue supporting the Commission in assessing systemic risks related to the dissemination of illegal content on online platforms, by contributing through the expertise of national authorities to strengthen the detection, prevention and mitigation of such risks.

Finally, by facilitating the exchange of information and expertise, the Board aims to strengthen a close and trustful cooperation with national authorities empowered to issue orders for removal of illegal content, in full respect of fundamental rights. In this context, the Board will expand its work on a common understanding regarding orders under Articles 9 and 10 DSA and on the notification of suspicions of criminal offences under Article 18 DSA.

3. Enhancing trust in the information space in full respect of fundamental rights

Numerous national elections, as well as the European Parliament election of 2024, underline the importance of being well prepared to address systemic risks related to the integrity of elections, through instruments like the DSA Elections Toolkit or the integration of the [Code of Conduct on Disinformation](#) into the DSA framework, which the Board endorsed. In addition, the Board contributed to the 2024 Post-Election Monitoring Report.

With a view to the effective application of the Code of Conduct, its signatories regularly publish publicly available transparency reports which communicate their efforts to counter disinformation, enabling civil society and researchers to monitor compliance, and Board and the Commission to monitor and evaluate the achievement of Code's objectives.

Further, Regulation (EU) 2024/900 on the transparency and targeting of political advertising (TTPA) complements the DSA by facilitating the identification of political advertisements, understanding who is paying for them and knowing whether and how users have been targeted to receive these advertisements. The Board will continue supporting the DSCs in the role given to them in that Regulation and contribute to the preparedness for crisis context.

The Board expects that the [Democracy Shield](#) will complement the DSA, particularly with respect to elections integrity and efforts to counter foreign interference and disinformation.

The Board will continue focusing on the DSA tools supporting the integrity of elections and incident response coordination. In addition, the Board will contribute to the successful implementation of the Democracy Shield and cooperate with the relevant authorities. Furthermore, the Board is ready to support the DSCs in setting-up their incident response protocols.

The Board will further contribute to scoping and defining DSA-related priority areas to identify and address risks to media freedom and pluralism, working closely with the Media Board on this matter.

Horizontal priorities

4. Strengthening result-focused cooperation among DSCs, the Commission and the Board

The eight Working Groups of the Board have grown into their role as groups of experts proactively contributing to the work and deliverables of the Board, including the preparation of the Board meetings, and identifying emerging relevant issues. Multiple best practices and common interpretations have been established and shared, for instance relating to complaints, elections or data access, thereby enhancing consistency and coherence in the implementation of the DSA. The Working Groups, whose meetings are transparently reported on the [Board's website](#), will further enhance this cooperation and concentrate even more on concrete deliverables. The Board will further improve coherence among the Working Groups and review and strengthen their working methods

As the DSCs are important sources of indications and potential evidence of DSA infringements, including by VLOPs and VLOSEs, the Board will continue to work with the Commission to facilitate the transmission of relevant information and evidence, including via the information sharing system. Moreover, the Board will play an even more important role in the exchange of best practices and information among DSCs and with the Commission, and assist DSCs in coordinating and cooperating on their enforcement priorities.

In addition, the Board will promote the use of formal cooperation tools foreseen in the DSA such as mutual assistance mechanisms and joint investigations. This may include enhanced sharing of information, in particular on the opening of investigations and intended final decisions, or the DSC of the provider's main establishment requesting other DSCs to exercise their investigative powers. In particular, the Board will clarify how the other DSCs can support the DSC of establishment in their work

Moreover, the Board will work on its opinion feeding into the Commission's report pursuant to Article 91(7) DSA that will assess, inter alia, the functioning of the Board.

5. Reaching out to the public, civil society, vetted researchers and other stakeholders

The Board will further augment its transparency and closely cooperate on clear communication, including across all Working Groups.

It will intensify its engagement with civil society and other stakeholders in a mutually beneficial way. The Board will be open for a structured dialogue and set up clear contact points. It will continue to take into consideration their concerns raised and information put forward

which may be essential for the DSCs' investigations. This may include stakeholder events and, where appropriate, invitations of experts to meetings of the Working Group or the Board.

In addition, the Board will continue to support the effective and practical implementation of the data access mechanism for vetted researchers, including through common guidance, inter alia for the assessment of data access applications. In this context, it will work closely with EU vetted researchers on the practical implementation of the [delegated act on data access](#) under the DSA to facilitate successful data-access applications. Vetted researchers play a key role in uncovering systemic risks, for instance regarding protection of minors, consumer protection or disinformation, and enhancing transparency and democratic resilience and safeguarding fundamental rights. In this context, the Board will continue its work on a common approach across the Union for the assessment of applications as vetted researchers which will ensure legal certainty.

6. Enhancing cooperation with other regulatory bodies and networks at EU level

Digital service providers may be subject to obligations stemming from multiple EU regulations including the AI Act, the GDPR, the Digital Markets Act, the Data Act, the Data Governance Act, the European Media Freedom Act, the Audiovisual Media Services Directive and EU consumer protection legislation.

To promote consistency, avoid fragmentation and reduce regulatory burden, the Board will continue fostering regulatory cooperation and cross-sectoral dialogues. For this purpose, it aims to further engage and cooperate with other EU level actors and networks such as the European Artificial Intelligence Board, the Media Board, Europol, the DMA High Level Group, the Consumer Protection Cooperation Network, the European cooperation network on elections, the Body of European Regulators for Electronic Communications or the European Data Protection Board. This cooperation and coordination will help ensuring that regulatory efforts reinforce one another, providing clear, predictable and effective oversight for providers of digital services, including online intermediaries. In this context, the Board will also explore possibilities for coordination to facilitate full compliance with the obligations resulting from different pieces of relevant EU legislation.

Complementing this regulatory cooperation and coordination at European level, the Board aims at intensifying its dialogue with international partners.

Organisational set-up

The Board's [Rules of Procedure](#) and the Working Groups' [Terms of Reference](#) have proven to ensure a very effective and constructive functioning of the Board and the Working Groups. The Board meetings will continue taking place regularly: approximately every 2 months in person in Brussels, and on an ad-hoc basis online when necessary. The DSCs are represented, in general, by the Head of the DSC. The meetings are chaired by the Commission at Director-General or Deputy Director-General level.

For enhanced transparency and to contribute to an open and participatory governance, the Board publishes via the [Commission webpage](#), the [agendas and minutes](#) of its meetings and the Working Group meetings. The Board continues to strengthen its public communication through regular press statements.

The Board's eight Working Groups help ensuring a coordinated application of the rules across borders and contribute actively to the implementation of the Work Plan. They enable DSCs and, where appropriate, other competent authorities to share their experience and enforcement approaches. Furthermore, they help to prevent regulatory fragmentation and contribute to developing best practices. The members of the Working Groups are the members of the Board, namely the DSCs who wish to participate in the relevant Working Group and, within the scope of their designation, other competent authorities. Other authorities with relevant expertise in light of the topics discussed may be invited in accordance with the Rules of Procedure and the Terms of Reference. Each Working Group is chaired by a representative from the European Commission and has elected a DSC to serve as Vice Chair.

During the first year of operation, the Working Groups held more than 60 meetings and contributed to the consistent application of the DSA throughout their deliverables and coordination efforts:

- *WG1: Horizontal and legal issues – Vice Chair: AGCOM (IT)*
- *WG2: Working together – Vice Chair: ACM (NL)*
- *WG3: Content moderation and data access – Vice Chair: Arcom (FR)*
- *WG4: Integrity of the information space – Vice Chair: CMS (SK)*
- *WG5: Consumers and online marketplaces – Vice Chair: BNetzA (DE)*
- *WG6: Protection of Minors – Vice Chair: CnaM (IE)*
- *WG7: Orders and criminal issues – Vice Chair: KommAustria (AT)*
- *WG8: IT Issues – Vice Chair: CnaM (IE)*

Annex 1: Scope of the working groups

DSA BOARD – WORKING GROUPS			
WG 1	WG 2	WG 3	WG 4
Horizontal and legal issues	Working Together	Content moderation and data access	Integrity of the information space
Definitions/ scope of DSA	General working arrangements	Trusted flaggers	Protecting the integrity of electoral processes
<i>Definition of intermediaries</i>	Cross-border cooperation	<i>Support to Commission Guidelines</i>	<i>Implementation of elections guidelines and best practices on DSC engagement</i>
<i>Identification and qualification of providers, services and place of main establishment</i>	<i>Joint investigations</i>	<i>Transparency reports</i>	<i>Interplay with Regulation (EU) 2024/900</i>
<i>Definition of micro and small enterprises exemption</i>	<i>Exchange of information and evidence</i>	Out-of-court dispute settlement	
	<i>Cooperation on enforcement priorities</i>	<i>Share experience and good practices</i>	
	<i>Investigative technique best practices</i>	<i>Cooperation framework on Article 21</i>	
General legal issues	Coordination of communication	Data access by researchers	Countering foreign information manipulation and interference / Democracy Shield
<i>Interplay between the DSA and other legal acts in light of Article 2 DSA</i>	Central point for interaction with civil society	<i>Harmonising the assessment of requests</i>	<i>Dissemination of mis-, disinformation and other civic discourse issues</i>
<i>Questions related to DSA harmonisation effect and direct applicability</i>	Board report on prominent and recurrent systemic risks	<i>Facilitate information for researchers</i>	<i>Monitoring and evaluation of the Code of Conduct on disinformation</i>
<i>DSC powers under Article 51 DSA.</i>	Operation of the Board	Transparency	<i>Recommender systems and AI as a risk factor</i>
<i>Designation of legal representatives and notices and actions mechanisms</i>	<i>Rules of Procedure</i>	<i>Monitoring and discussion of the DSA transparency toolbox</i>	
<i>Enforcement actions at national level</i>	<i>Terms of Reference of the WGs and consistency</i>	<i>Engagement with stakeholders on the DSA transparency toolbox</i>	
<i>National and European litigation related to the DSA</i>	Capacity building	Intellectual Property rights issues	Contributing to protect media freedom and media pluralism, while supporting freedom of expression and information
	Complaint handling	Other issues related to content moderation and data access	<i>Cooperation with Media Board</i>
Fees [levied by DSCs]	Incident and threat response_		<i>Definition of priorities to address risks under the DSA</i>

DSA BOARD – WORKING GROUPS

WG 5	WG 6	WG 7	WG 8
Consumers and online marketplaces	Protection of Minors	Orders and criminal issues	IT Issues
<p>Articles 25, 30-32</p> <p><i>Exchange of information/knowledge about current issues and trends observed on online marketplaces</i></p> <p>Article 26</p> <p><i>Exchange of information about scam advertisements on online marketplaces, and other online platforms</i></p> <p>Interplay between the DSA and consumer protection</p> <p><i>Building of expertise and knowledge on consumer protection issues</i></p> <p><i>Exchange of information on current trends and legislative developments</i></p> <p><i>Cooperation with consumer protection, customs and market surveillance authorities and other relevant national and EU authorities</i></p> <p><i>Facilitating cooperation, network building and information sharing</i></p>	<p>Article 28 Guidelines</p> <p><i>Work together with the Commission in implementing the Article 28 Guidelines</i></p> <p><i>Mapping of compliance by platforms with Article 28 (1)</i></p> <p><i>Provide expert advice on compliance solution</i></p> <p>Age Verification</p> <p><i>Support the Commission in further developing and implementing a coordinated and forward-looking EU wide approach to age verification and age assurance technologies</i></p> <p>Adult content</p> <p><i>Coordinated action plan to enforce the DSA against providers of adult content</i></p> <p>Social media and mental health</p> <p><i>Provision of inputs to the Commission for the forthcoming inquiry into the effects of social media on the mental health of minors and young people.</i></p> <p>Cyberbullying</p>	<p>Articles 9-10 DSA (orders)</p> <p><i>Expertise, knowledge building and awareness raising</i></p> <p><i>Transmission of orders</i></p> <p><i>Impact on the e-Evidence package</i></p> <p>Article 18 DSA (notifications)</p> <p><i>Awareness among providers</i></p> <p><i>Scope of the notification obligation</i></p> <p><i>Compliance monitoring</i></p> <p>Cooperation with law enforcement and judicial authorities</p> <p><i>Information sharing</i></p> <p><i>Complementarity with existing workstream, and with relevant law and judicial authorities</i></p> <p>Illegal content</p> <p><i>Mapping types of illegal contents</i></p> <p><i>Compliance monitoring of illegal content mitigation measures</i></p> <p><i>Monitoring and evaluating of Hate Speech Code of Conduct</i></p>	<p>Maintenance of AGORA (art 85 DSA, Implementing Regulation 2024/607), Transparency Database (art 24(5) DSA) and related systems.</p> <p>Development of new functionalities in AGORA, Transparency Database, Data Access (article 40) and Platforms Portal, and related systems.</p> <p>Analyse the need for interoperability with other systems beyond articles 9, 10, and 53 DSA.</p> <p>Future ICT developments</p> <p>Follow-up of other working groups regarding ICT implementation</p> <p>Coordination with other working groups on the AGORA use cases.</p>

Annex 2: Board main achievements from September 2024 – August 2025

During its first annual work plan, the Board had, inter alia, the following achievements:

- Facilitated coherent DSA implementation by endorsing a common baseline for the DSCs' annual activity report under Article 55 DSA
- Supported the conversion of the *Code of Practice on Disinformation* into an enforceable Code of Conduct (under Article 45 DSA) by providing its conclusions on the Code
- Supported the conversion of the *revised Code of Conduct on Countering Illegal Hate Speech Online* + into an enforceable Code of Conduct (under Article 45 DSA) by providing its conclusions on the Code
- Facilitated data access for researchers by endorsing the draft delegated act on data access and endorsing the DSCs cooperation on vetted researchers
- Supported election integrity by adopting the election toolkit, by publishing a post-election report on the European Parliament elections, and by contributing to the Commission guidelines for the mitigation of system risks online for elections
- Actively contributed to the preparation of the Commission's Guidelines under Article 28(1) DSA.
- Launched the first coordinated action of the Board on platforms which make pornographic content unlawfully accessible to minors.
- Supported the Commission in the release of the first version of an EU white-label age-verification blueprint.
- Provided its views on the preliminary findings in the cases against X, TikTok, AliExpress and Temu.