



ANNUAL REPORT

February 2025 - December 2025

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GENERAL INFORMATION

FSWS: Agenzija Appoġġ - Besmartonline
25th February 2025 – 31st December
2025

Submitted: 19th January 2026

Reviewed 30th March 2026



INDEPENDENCE OF TRUSTED FLAGGER

a. Organisational structure and decision-making

There were no significant changes to the organisation's structure or decision-making processes during the reporting period. The Trusted Flagger function continued to operate within the existing framework of FSWS-Appoðg, following the same governance structures, statutory provisions, and decision-making procedures.

This reporting period should be understood as a transitional phase. During this time, FSWS-Appoðg further developed its understanding of the specific legal and procedural requirements associated with Trusted Flagger status under the Digital Services Act.

While reports were submitted to platforms throughout the reporting period, these were not consistently structured as formal Trusted Flagger notices in line with DSA requirements, as reporting practices at the time primarily referenced applicable platform guidelines rather than specific legal provisions.

As internal processes and understanding of the Trusted Flagger framework evolved, reporting practices were progressively refined to ensure full alignment with the required legal and procedural standards. This report reflects that period of transition and confirms the organisation's commitment to full compliance going forward.

b. Operational aspects

No significant changes were made to the organisation's operational processes during the reporting period. The Trusted Flagger function remains embedded within the ongoing operations of FSWS-Appögg.

During this period, instances of illegal online content identified and supported by sufficient evidence were reported to the relevant Very Large Online Platforms (VLOPs). These reports were primarily submitted with reference to applicable platform guidelines, reflecting the operational understanding and procedures in place at the time.

In some instances, the Trusted Flagger reporting channel was utilised; however, reports did not consistently include explicit reference to the relevant legal provisions under the Digital Services Act, as required.

Clarification regarding these specific requirements was obtained following the submission of the initial submission of this report. Reporting practices are therefore being updated to ensure full alignment with the applicable legal and procedural standards moving forward.

c. Funding sources

There were no changes or additions to the organisation's funding sources during the past year. Funding levels and sources remained consistent with previous years.

NOTICES VOLUME

Category 3: Cyber Violence

Cyber Harassment	4
Cyber Incitement to hatred or violence	1
Non-consensual (intimate) material sharing, including (image-based) sexual abuse (excluding content depicting minors)	1
Non-consensual sharing of material containing deepfake or similar technology using a third party's features (excluding content depicting minors)	3

Category 9: Protection of Minors

Child sexual abuse material	7
Grooming/sexual enticement of minor	2
Not captured by any other sub-category	1

Category 11: Scams and/or fraud

Not captured by any other sub-category	2
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Total **21**



BREAKDOWN OF NOTICES BY HOSTING PROVIDER

The Following were requests for interventions

Discord

Category	Details
Hosting Provider	Discord Inc.
Type of Content	related to CSAM content, potential grooming, and potentially harmful
Action Taken	Removed (8 reports); No action; Unknown status
Dates Submitted	11 June, 26 June (multiple), 19 February, 9 May, 27 June 2025
Response Time	Same day to 1 day (actioned); 15+ days for non-actioned report
Notification Disputed	No
Grounds Cited	Investigation conducted; content removed under ToS; in some cases non-intervention pending further information
Legal Reference	Not explicitly cited at the time of reporting; reports were submitted with reference to platform guidelines.

TikTok

Category	Details
Hosting Provider	TikTok Ltd.
Type of Content	Hate and harassment, cyberbullying, technical difficulty in reporting
Action Taken	Removed (2 reports); No action / technical issue (1 report)
Dates Submitted	30 April, 11 August, 6 October 2025
Response Time	30 April: same day removal; 11 August & 6 October: technical difficulties
Notification Disputed	No (removals); Yes (technical reporting issues)
Grounds Cited	Violated content policy;
Legal Reference	Not explicitly cited at the time of reporting; reports were submitted with reference to platform guidelines.

Meta (Facebook & Instagram)

Category	Details
Hosting Provider	Meta Platforms Inc.
Type of Content	Fraud, defamation, cyberbullying of educators, money extortion
Action Taken	Taken down (1 Sept, 25 Feb); Not taken down (some reports)
Dates Submitted	1 September, 23 June, 18 February 2025
Response Time	Same day for some reports; no response on others
Notification Disputed	No for takedowns; Yes for non-actioned
Grounds Cited	Investigation conducted; community guideline violations
Legal Reference	Not explicitly cited at the time of reporting; reports were submitted with reference to platform guidelines.

Soundcloud

Category	Details
Hosting Provider	SoundCloud Limited
Type of Content	Non-consensual intimate content (nudified and extorted)
Action Taken	Removed + user warning (2 reports); Content reuploaded (1 report)
Dates Submitted	4 September, 7 September 2025
Response Time	Same day; re-upload occurred later
Notification Disputed	No
Grounds Cited	Violation of ToS and Community Guidelines; non-consensual content policy
Legal Reference	Not documented; DSA Art. 15 and abuse-material provisions
Grounds Cited	Violation of ToS and Community Guidelines; non-consensual content policy
Legal Reference	Not explicitly cited at the time of reporting; reports were submitted with reference to platform guidelines.

Youtube

Category	Details
Hosting Provider	YouTube LLC (Google)
Type of Content	Harassment and physical abuse on women (adult) involving drugs (public space)
Action Taken	Not taken down (as of March 2025)
Dates Submitted	24 Mar 2025
Response Time	No response / no action
Notification Disputed	No
Grounds Cited	Not documented
Legal Reference	Not documented; DSA and harassment / violence policies
Grounds Cited	Violation of ToS and Community Guidelines; non-consensual content policy
Legal Reference	Not explicitly cited at the time of reporting; reports were submitted with reference to platform guidelines.



CHALLENGES

Issues encountered

The reporting period was a transitional one for FSWS-Appogg in its capacity as a Trusted Flagger. As the organisation developed its understanding of the formal requirements of the role under the Digital Services Act, a key challenge involved refining internal processes to identify and apply the most appropriate communication and escalation channels with online platforms.

During this period, reports concerning illegal online content were submitted through a combination of established communication channels and, in some instances, the Trusted Flagger reporting channels. At the time, reports were primarily framed with reference to applicable platform guidelines and did not include explicit citation of the relevant legal provisions, resulting in variations in how reports aligned with formal Trusted Flagger requirements.

This learning phase contributed to stronger operational clarity but also highlighted limitations in addressing cases that fall outside the defined scope of the Trusted Flagger mechanism.

A further challenge relates to the scope of the DSA itself. Content shared through private channels, such as direct messaging, falls outside the primary scope of platform obligations under the Trusted Flagger framework. This presents a significant limitation in practice, particularly in cases involving behaviours such as grooming and non-consensual sharing of intimate content, which frequently occur in private exchanges rather than publicly visible spaces.

Clarification of the formal requirements was obtained following the conclusion of the reporting period and submission of the initial report, and reporting practices are therefore being updated to ensure full alignment with the framework.