

Table 1: Accountability schemes applicable to online platforms in Europe

		Actors	Forum	Legitimacy	Obligation	Compliance	Consequences
Statutory law	KoPI-G	Communication platform providers (KoPI-G §1 (2))	NRA – KommAustria and RTR- GmbH – Media Division (KoPI-G §8)	Protection of users on communication platforms against new forms of violence, and hate on the Internet ('platforms' responsibility)	Organisational for the effective and transparent handling of certain illegal content (KoPI-G §3) Transparency on due diligence obligations (prevention of illegal content, resources) (KoPI-G §4 (2.2)) Reporting obligations (general) KoPI-G §4 (1))	Reports (public) (Half-yearly or annual) (KoPI-G §4) Users (affected) directly informed (KoPI-G §3(1)-(3)) Redress provided (KoPI-G § 3(4)) Responsible representative (KoPI-G §5)	Improvement order (KoPI-G §9) Administrative fines (KoPI-G §10)
	MStV.	Media intermediaries (MStV §91)	Media Authorities – Commission on Licensing and Supervision (MStV §105 (10))	Prevention of discriminatory blocking/de-ranking of specific journalistic-editorial offers	Transparency on criteria of (non-) prioritisation of journalistic-editorial offers (MStV §93 (1, 3))	Reporting (public) and case-by-case assessments based on/against reported criteria (MStV § 93) Designated/authorised representative (MStV §92)	Administrative Offence/fines (MStV §115 (46))
	DSA	Online platforms (distinguished very large online platforms)	National digital service coordinator (DSA §67), European Board for Digital Services (DSA §47)	(Re)balanced responsibilities of users, platforms, and public authorities according to	Transparency on systemic risks assessment including media	Transparency reports (VLOPs) every six (public) months (DSA §13, 33 (1))	Penalties set by EU Member States (DSA §42 (1))

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		(VLOPs) (DSA §2 h, §25)	and the European Commission (DSA §51)	European values, placing citizens at the centre	pluralism (DSA §26-27) Transparency of recommender systems (DSA §29) Transparency in online advertising (DSA §24)	Data sharing with vetted researchers (VLOPs) (DSA §31 (2)) Audit (VLOPs) (DSA §28 (3) and 33 (2)) Compliance officer (DSA §32) Codes of conduct (Union level) (DSA §35)	Penalties by the EC (DSA Preamble 100, §59)
European legal and policy standards	CoE 2021	Platforms and intermediaries (CoE 2021, 25)	Independent national media regulatory authorities; Courts (human rights and the rule of law compliance; appeal by platforms) (CoE 2021, 25 v)	Mitigate the process of digital fragmentation; Restore trust in public information; Promote media diversity and pluralism; Advance ethics of truth-seeking and open deliberation (CoE 2021, 4-5) Avoiding exploitation for censorship or propaganda (CoE 2021, 7-8)	Openness and inclusiveness; transparency about opt-out options (CoE 2021, 25 i-vi)	Reporting on opt-out rates; Voluntary audit of prioritisation (CoE 2021, 25 v, vii)	No reference to consequences

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				Avoiding commercialisation and perpetuation of inequalities (CoE 2021, 9-10) Safeguarding of human rights (freedom of expression, right to private life and data protection) (CoE 2021, 25 iv-v)			
	CoE 2022	The media and platforms (CoE 2022, EM 13) States (CoE 2022, EM 13)	Independent media and/or platform regulatory authorities; Independent third parties and other external experts (CoE 2022, EM 13)	Guaranteeing the discoverability, prioritisation and prominence of quality journalism (CoE 2022, EM 13)	Transparency, explainability and accountability of algorithmic systems for content dissemination (data processing, criteria of selection); Transparency about equal treatment of content (non-discrimination); about opt-out options from personalisation (CoE 2022, EM 13)	Monthly and annual reporting (views of public interest content compared with other content; comparison of viewing on prioritised content and non-prioritised); Reporting duties on algorithmic content curation and prioritisation (CoE 2022, EM 13)	No reference to consequences
Cross-platform standards	EU Code of Practice	Platforms (Signatories)	Permanent Task Force (Signatories, EDMO, ERGA, EC and	Countering disinformation	Transparency on the prominence of authoritative	Monitoring (Task Force, ERGA, EDMO, EC);	Indirect (revelation of non-compliance)

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	on Disinformation 2022		EEAS) (EC Code on Disinformation, 2022, 37)		information; transparency of recommender systems (prioritisation); Establish and maintain the common Transparency Centre website (EC Code of Practice on Disinformation, 2022, 18.1, 19, 34)	Reporting on Service Level Indicators (SLIs) and Qualitative Reporting Elements (QREs); Audits (by VLOPs) (EC Code on Disinformation, 2022 40, 44)	
	RDR 2022	Tech companies		Safeguarding fundamental rights	Disclosure of the use of algorithmic systems to curate, recommend, and/or rank the content; Disclosure of variables used by algorithms; Users' control over variables; Opt-in/-out by users (RDR F12)		Reputational (Ranking and scorecards)
Solo-regulation	Meta	Meta	No direct forum Indirect: Internal content moderators; Meta's Human Rights Director;	International human rights standards (United Nations Guiding Principles on Business and	Avoiding low-quality, objectionable, particularly sensitive, or inappropriate (for	Transparency reports (Meta, 2022c) Indirect: Complaint to BAI (AVMSD): not applicable yet	(eventual) Policy/process adjustment (solo-regulation)

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			Oversight Board Indirect: Irish NRA (BAI) – (AVMSD): not applicable yet	Human Rights) (Meta, 2021a)	younger viewers) content (Meta, 2022d), (Meta, 2022e) Avoiding the risk of harm (physical, emotional and financial harm, or a direct threat to public safety) (Meta, 2022a) Prioritisation of “newsworthy” content – criteria: “special value” (e.g., imminent threat to public health or safety); country-specific circumstances; politically relevant speech; mediated country context (free press) (Meta, 2022a) Personalisation (machine learning (ML) ranking): content integrity, scoring/ranking,		Indirect: AVMSD-based sanctions: not applicable yet

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					contextualisation (Lada et al., 2021) Ranking: inventory, signals, predictions and relevance (Meta, 2022b)		
	TikTok	TikTok	EMEA Trust & Safety Hub Transparency and Accountability Centers (access only to policy, content safety, or security experts) Indirect: UK NRA (Ofcom) – (AVMSD)	No reference to legitimacy	Prioritisation of 'safety, diversity, inclusion, and authenticity' (TikTok, 2022a) Personalisation; Interrupting repetitive patterns; diversity (TikTok, 2019)	Community Guidelines Enforcement Report (TikTok, 2022b) Transparency Center – selected/approved experts to examine and verify TikTok's practices Complaint to Ofcom (AVMSD)	(eventual) Policy/process adjustment (solo-regulation)
	Twitter	Twitter	No direct forum Indirect: Trust & Safety team (Twitter, 2022e) Indirect: Irish NRA (BAI) – (AVMSD): not applicable yet	Open Internet (free and secure) (Twitter, 2022d)	Public interest exception for content that would otherwise violate the Twitter Rules (Tweets from elected and government officials): labelling & users' choice (placing a Tweet behind a notice) (Twitter, 2022c)	Twitter Transparency Center (Twitter, 2022e) Twitter-; DM-; Account-level enforcement (Twitter, 2022b) Indirect: Complaint to BAI (AVMSD): not applicable yet	(eventual) Policy/process adjustment (solo-regulation) Indirect: AVMSD-based sanctions: not applicable yet

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					Limiting engagement (no likes, no Retweets, no sharing, no algorithmic recommendation) (Twitter, 2022c) Enabling users' choice (Twitter, 2022a)		

Key: AVMSD – Audiovisual Media Services Directive; CoE – Council of Europe; DSA – Digital Single Act; EC – European Commission; EDMO - European Digital Media Observatory; EEAS - European External Action Service; ERGA – European Regulators Group for Audiovisual Media Services; EU MSs – European Union Member States; KoPI-G - Communication Platforms Act; MStV - Medienstaatsvertrag; NRA – National Regulatory Authority; RDR – Ranking Digital Rights 2022; VLOPs – Very Large Online Platforms.

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