Between Click and Consequence:

An Evaluation of Platform Reporting Procedures under the Digital Services Act



















Reporting channels and platform responsibility in the digital space

Users who encounter illegal content online on an online platform should be able to report this to the platform operators in an easy and effective way. At least that is what the European Union's Digital Services Act (DSA) requires. The DSA sets out clear rules for handling illegal content. Content deemed illegal under national law must be removed from a platform without delay once it has been reported.

The DSA stipulates that the channels through which users can report potentially unlawful content or content that violates a platform's community guidelines and terms of service must be user-friendly and easily accessible. The present study provides a comprehensive assessment of the user-friendliness and effectiveness of reporting channels on X, Facebook, Instagram and TikTok – very large online platforms (VLOPs) - under the DSA in Germany, as well as of users' motivations for reporting content:

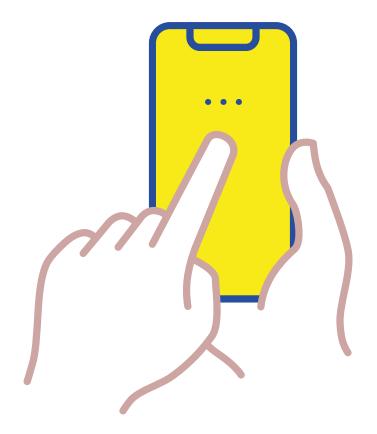
- What motivates users to file a report and what discourages them from doing so?
- How clearly are reporting channels designed and what difficulties do users encounter?
- · How are the reporting channels of different platforms perceived and used?

• Are there differences between reporting channels set up under the DSA and those set up under a platform's community guidelines?

Results

PERCEPTION

Users regarded fraud (93%), threats against other users (88%) and racist or antisemitic content (83%) as especially problematic. In interviews, violence, child abuse and suicide announcements were considered particularly worthy of reporting. Whether respondents actually reported insults, however, often depended on how personally affected they felt.



Responsibility for removing problematic content was attributed primarily to the platforms (87%), followed by law enforcement authorities (75%); individual responsibility was seen only as complementary (53%).

While most respondents felt capable of reporting content and understood the reporting channels, some doubted the effectiveness and transparency of the process. Many suspected that the reporting process was intentionally complicated or questioned whether reporting was actually useful. Alongside reporting, counter-speech was highlighted as helpful, while some respondents were critical of the risk of misuse of overly simple systems.

USE Reasons for or against reporting content

About half of the respondents in the quantitative study had previously reported problematic content – in particular younger, well-educated and politically engaged users with high levels of online activity. Reports were mostly made under community guidelines, as the DSA reporting channel was hardly known. The main reasons cited for reporting content were severity of content, personal involvement and the desire to improve one's online environment. Reasons for not reporting content were a lack of trust in the platforms, the perceived futility of reporting, disinterest or unclear processes; many opted to simply ignore problematic content.

Simulation of the reporting processes on X, Facebook, Instagram and TikTok

Participants in the quantitative survey were randomly assigned to simulated reporting channels of Meta (Facebook and Instagram), TikTok or X, which differed greatly in structure and complexity. The study examined whether participants could correctly classify content deemed legally relevant and to what extent they used the specific DSA

reporting channel for illegal content. The results show that the DSA channel was rarely used (Meta: 9%, TikTok: 2%, X: 11%).

The qualitative interviews revealed that users often did not use the DSA reporting channel because it was difficult to find and tended to be hidden behind community categories. Many chose the first categories offered – which often already fit the case – or avoided the DSA option out of uncertainty about the legal classification of content. Despite these obstacles, a majority of participants in the quantitative survey rated the overall reporting process positively: two-thirds found it clear (66%), comprehensible (65%), straightforward (64%) and simple (64%).

IMPACT Evaluation of the reporting channels

Clearer differences emerged between DSA and community guideline reporting. The process for DSA reporting was consistently rated as more difficult, more confusing and more complicated, as well as somewhat less clear and less comprehensible than reporting via community guidelines

The findings of our qualitative interviews also show that users found reporting under community guidelines to be less daunting than the reporting process under the DSA. Many avoided the DSA process because it was seen as cumbersome, raised uncertainty about legal consequences or required submitting personal data – which in some cases was a source of fear or distrust. At the same time, most users perceived the reporting process as manageable and understandable, though the categories were sometimes viewed more critically.

Reasons for aborting the reporting process

Overall, 6% of respondents aborted the reporting process. More than a quarter of DSA

reports (27%) were discontinued, compared with only 4% of community guideline reports. As reasons for not continuing with the reporting process, about a quarter of the 117 respondents who had done so said they were "overwhelmed by the options". Another third reported no longer knowing "how to continue" (32%). Intense social media use and the perception of negative consequences of problematic content statistically increased persistence. Many respondents found the categorization too complex and overly detailed, leading to frustration, while others pragmatically selected a suitable option to complete the process.

Future reporting behavior

The findings show that users remain willing to report problematic content in the future but see themselves primarily as informants. They expect platforms to handle the legal review and classification of content. Their willingness to report content depends on a transparent and understandable process: clear categories (80%), quick responses from the platforms (71%), detailed process descriptions (69%) and meaningful feedback (66%).

The design of the reporting process also appears improvable, with some respondents describing it as unintuitive, overloaded or half-hearted. Placing too much responsibility on users – for instance by requiring detailed legal assessments – was rejected and seen as discouraging.

Policy recommendations

Strengthen the DSA's impact, clarify reporting channels

1. Standardization of reporting channels

It must be clarified what exactly is meant by reporting mechanisms that are "easy to access and user-friendly" under Article 16(1). Currently, these mechanisms differ widely between platforms. We recommend standardizing the reporting channels for DSA-relevant content on VLOPSEs. To this end, the European Commission could promote the development of industry standards for VLOPSEs to standardize reporting channels.

2. Enforcement of community standards

Users find it easier to report violations of community guidelines than illegal content and tend to prefer these reports. We call on VLOPSEs to enforce their community guidelines clearly.

3. Public awareness

Many users refrain from reporting content because they expect no response from platforms or are unsure whether the content is illegal or not. Since current reporting strongly depends on motivation and legal knowledge, the European Commission and national DSCs should build trust through awareness campaigns and inform users of their rights.

4. Design of reporting channels

Users often find current reporting channels overwhelming and are deterred by the legal language. Many abort the process - especially reporting under the DSA – because it assumes prior legal knowledge. The responsibility for legal assessment should not fall on users. We recommend that VLOPs clearly distinguish between reports under community guidelines and those under the DSA for example by asking users directly about their reporting intention without intimidating them with legal language. Instead of complex legal input, drop-down menus with optional free-text fields could make reporting simpler and more accessible. Warnings that reporting illegal content could have legal consequences should be toned down.

5. Support by Design

The survey shows that unclear categories and comprehension problems prevent users from reporting content. We therefore recommend integrating support directly into the reporting process – for example through links to legal aid organizations, reporting offices or out-of-court dispute settlement bodies.

About the study

The study "Between Click and Consequence: An Evaluation of Platform Reporting Procedures under the Digital Services Act" was commissioned in 2025 by the civil society organization Das NETTZ. The goal is to provide a comprehensive evaluation of the userfriendliness and effectiveness of reporting channels under the DSA in Germany and of users' motivations for reporting content. The survey included 2,040 regular platform users in Germany aged 16 and older and 20 individuals of different ages and genders in qualitative exploratory interviews.

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Further information on the study

https://www.das-nettz.de/publikationen/ zwischen-klick-und-konsequenz-eine-evaluationder-meldeverfahren-von-plattformen-nach

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