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Handout for Youth-Work Organizations with a Reporting Function:

How to Collaborate with Digital Services Coordinators under the DSA

Introduction & Executive Summary

Youth-work organizations today play a crucial role in protecting young people online. Whether they operate helplines, peer-education programs, cyberbullying support services, hate-speech reporting portals, or broader digital citizenship initiatives, they often serve as first-responders to online risks. These organizations are usually the first to know when a harmful challenge goes viral, when a new form of harassment emerges, or when certain communities of young people become targets of hate speech or grooming. Despite this critical role, until now their cooperation with state authorities and online platforms has often been informal, inconsistent, and highly dependent on personal relationships.

The **Digital Services Act (DSA)** fundamentally changes this landscape. It establishes clear structures for platform regulation across the European Union and creates a new national authority in each Member State — the **Digital Services Coordinator (DSC)**. For youth organizations, the emergence of DSCs represents a historic opportunity: for the first time, they can formally influence platform accountability, contribute to risk assessments, report illegal content through recognized channels, and collaborate with a national authority that has the power to enforce platform obligations.

This handout offers a practical, text-based guide for youth-work organizations on how to work effectively with DSCs. It explains the legal context, the mandate and structure of DSCs, and the contributions youth organizations are uniquely positioned to make. It also outlines reporting procedures, crisis-response cooperation, data handling principles, research collaboration, and long-term strategic engagement. The goal is to equip youth-focused NGOs with the knowledge and practical approaches needed to integrate smoothly into the new DSA ecosystem and maximize their impact on the digital safety of young people.

The DSA in Context: Why It Matters for Youth Organizations

The Digital Services Act was created to ensure a safer, more transparent, and more accountable digital environment across the EU. For youth workers, three elements of the DSA are particularly important. First, the DSA introduces strict rules for how platforms must handle illegal content, including hate speech, child sexual abuse material, violent threats,

and certain forms of privacy violations. Platforms must enable users and organizations to submit notices, process them rapidly, and take action when the content is indeed illegal.

Second, the DSA introduces **special obligations for protecting minors**. Online platforms must design their services with the best interests of children in mind, avoid manipulative design practices, ensure high privacy-by-default settings for minors, and assess risks related to mental health, cyberbullying, addictive behaviours, exposure to harmful content, and exploitation.

Third, the DSA creates a multi-layered regulatory structure. The European Commission supervises the largest platforms (VLOPs and VLOSEs), while national DSCs supervise all platforms active within their jurisdictions. Youth organizations, by nature, operate at local or national level and thus fit very logically into the DSC's cooperative ecosystem. Their observations, case trends, and direct interactions with young users provide essential context that DSCs cannot access on their own.

This is why the DSA encourages structured collaboration between national authorities and civil-society actors. Youth organizations therefore have an opportunity not only to contribute to online safety on a case-by-case basis, but also to shape regulatory enforcement, systemic risk assessments, and platform accountability. The value of this collaboration lies in its ability to combine regulatory authority with real-world experience — a combination essential for making digital environments safer for young users.

Understanding Digital Services Coordinators (DSCs)

Digital Services Coordinators are newly established national authorities responsible for overseeing the enforcement of the DSA. While their structure may vary depending on the Member State — some are integrated into existing regulators, others are entirely new bodies — their mandate is consistent across the EU. A DSC must supervise all digital services operating in the country, investigate potential violations, certify trusted flaggers, work with civil society and researchers, and act as a central contact point for both platforms and the European Commission.

For youth organizations, it is useful to understand how DSCs typically operate internally. Most DSCs include at least three important units. The first is an **enforcement and investigation unit**, which reviews incoming reports, conducts inquiries into platforms, requests information, and develops enforcement measures. The second is a **systemic risk and platform assessment unit**, which evaluates whether platforms comply with obligations related to protecting minors and mitigating the spread of illegal or harmful content. The third is a **stakeholder and civil-society engagement unit**, responsible for coordinating cooperation with NGOs, educational actors, research institutions, and public bodies.

Youth organizations may interact with all three units. For example, when submitting a report about a harmful incident affecting a young person, an NGO would communicate with the enforcement unit. When providing insights into systemic trends, such as cyberbullying patterns or emerging harmful challenges, they might collaborate with the risk-assessment

unit. And when participating in public consultations, campaigns, or working groups, they would engage with the stakeholder unit.

Understanding these structures helps youth organizations know whom to approach for different types of cooperation and how to integrate their work into established regulatory processes.

Why Youth Organizations Are Essential Partners for DSCs

Although DSCs have strong regulatory powers, they lack something youth organizations possess: **constant, direct contact with young people and communities**. Regulators do not run helplines, workshops, school programs, or peer-education initiatives. They do not see cyberbullying cases unfold in real time, nor do they follow trends on TikTok, Discord, or Instagram from the perspective of young people. Youth organizations, by contrast, witness these dynamics daily.

This creates a natural synergy. DSCs need high-quality, contextual, up-to-date information about what is happening on platforms — and youth organizations need an authority that can actually enforce accountability. Young people often experience harms that are not fully captured in platform transparency reports or official complaint mechanisms. Youth workers understand how certain behaviours manifest, why young people interpret content in a particular way, and what specific vulnerabilities exist among children and teenagers.

For example, a youth NGO may observe that a seemingly harmless meme format is being used to target neurodivergent students in private group chats. A DSC on its own would not detect this trend, but with NGO insights, it can understand the harm, evaluate whether platforms are failing to remove illegal content, and require platforms to adjust policies or enforcement systems.

Similarly, when a new harmful challenge emerges, youth organizations may be the first to hear about it from students. Platforms may respond slowly or inconsistently unless a regulator steps in. In such cases, the NGO can provide early warnings to the DSC, enabling a faster, coordinated response.

In short, youth organizations represent a type of expertise and situational awareness that DSCs cannot replicate internally. The DSA recognizes this and explicitly encourages cooperation, making NGOs indispensable partners in safeguarding young people's online environments.

How Collaboration Works in Practice: Communication and Reporting

The most foundational mechanism of cooperation between youth organizations and DSCs is the **structured reporting of illegal or harmful content**. While NGOs today may already

submit reports directly to platforms, the DSA creates additional pathways through the DSC. This is beneficial in cases where platforms do not respond adequately, when a pattern suggests systemic failures, or when the harm is particularly severe.

To ensure that DSCs can act effectively, youth organizations should develop clear internal procedures for verifying content, documenting evidence, and providing contextual information. A good report includes: the URL of the content, screenshots with timestamps, a short description of the situation, relevant legal context if known, and a brief explanation of why the content is harmful to the young person involved. If an organization already runs an established reporting system, it can integrate DSA-specific fields into its submission process.

Once the report reaches the DSC, the authority evaluates its validity and decides whether to forward it to the platform, request further information, or initiate a more comprehensive investigation. The DSC may also contact the NGO for clarification. When platforms respond, the DSC will typically inform the NGO about the outcome. Over time, this creates a structured loop of communication that significantly improves the quality and consistency of content moderation outcomes.

Beyond individual cases, youth organizations may also submit **periodic summaries** of trends they observe, such as "monthly youth online harm briefings" or "quarterly trend reports." DSCs can incorporate these into their annual risk assessments, enabling them to identify emerging patterns and hold platforms accountable for failures to address widespread harms.

Crisis Response and Rapid Escalation Mechanisms

Certain online harms escalate quickly and require immediate action. These might include viral suicide challenges, coordinated hate campaigns targeting a school, dissemination of intimate images of minors, or threats of violence. In such cases, typical reporting channels may be too slow. The DSA anticipates this and allows DSCs to activate special crisis-response procedures.

Youth organizations should work with their DSC to establish a **joint crisis protocol**. This protocol can specify how both parties communicate during emergencies, what information the NGO must provide, how the DSC will contact the relevant platform, and how both entities will coordinate follow-up actions. For example, the NGO may send a pre-formatted emergency report to a designated DSC 24/7 mailbox, including details such as timestamps, affected individuals (anonymized), screenshots, and narrative context. The DSC can then immediately instruct the platform to remove content or take protective measures.

A well-defined protocol also clarifies when an incident should be escalated beyond the DSC. If the crisis has cross-border implications or involves a Very Large Online Platform (VLOP), the DSC may coordinate with the European Commission. In extreme cases — such as threats to public safety — other state institutions may become involved.

For youth organizations, having such a protocol in place reduces uncertainty, accelerates response times, and increases young people's trust in the support services available to

them. The mere existence of a clear escalation pathway can significantly improve outcomes for victims of online harm.

Supporting Systemic Risk Assessments and Research

A major innovation of the DSA is the requirement for Very Large Online Platforms to conduct annual **systemic risk assessments**. These focus on how platform design, algorithms, business models, and content moderation systems may create or amplify risks, especially for minors. DSCs are responsible for reviewing these assessments, requesting additional information from platforms, and evaluating whether mitigation measures are adequate.

Youth organizations can play a crucial role in this process by contributing empirical data, real-world examples, and contextual insights that platforms often overlook. For instance, a platform's risk assessment might claim that cyberbullying incidents are decreasing based on automated moderation statistics. However, youth workers may observe that the bullying has simply moved into private channels or mutated into more subtle behavioural patterns. Such insights are invaluable to DSCs, enabling them to challenge platform claims and request stronger mitigation measures.

Collaboration can take multiple forms. Youth organizations can participate in **focus groups**, contribute to **consultations**, share **annual or thematic research**, or join **working groups** established by the DSC. They can also partner with academic institutions to collect data that supports DSC investigations or informs policy recommendations. In some countries, DSCs may even fund civil-society monitoring initiatives or offer grants for youth safety research.

By participating in systemic risk analysis, youth organizations help ensure that regulatory decisions reflect the lived experiences of young people rather than abstract assumptions. This also strengthens their legitimacy as actors in digital policy and amplifies their influence on the safety standards platforms must uphold.

Awareness, Prevention, and Public Communication

Beyond enforcement, DSCs are also expected to support digital literacy and public awareness initiatives. They may run national campaigns, publish informational materials, or collaborate with schools. Youth organizations are natural partners in this area, as they already operate in educational environments and have strong connections to young people, teachers, parents, and local communities.

Joint awareness campaigns can take many forms. Some may focus on helping young people recognize manipulative platform design techniques or understand privacy settings. Others may address cyberbullying, mental health impacts of social media, or responsible content sharing. Youth organizations contribute practical knowledge about what messages resonate with young people and which formats — workshops, videos, peer-education activities — are most effective.

DSCs can also support youth organizations in developing educational materials by providing regulatory context, legal expertise, or access to platform guidance. In some countries, DSCs may even financially support NGOs producing educational programs aligned with DSA goals. This creates an ecosystem where prevention, education, and enforcement reinforce each other.

The visibility gained through co-branded campaigns also enhances the credibility of youth organizations, which can help secure funding, reach new audiences, and strengthen their advocacy work.

Data Protection, Trust, and Ethical Considerations

Any cooperation between youth organizations and DSCs must respect the privacy and dignity of young people. Youth workers often collect sensitive information, including personal details, screenshots, and narratives about harmful incidents. When sharing such information with DSCs, NGOs must carefully apply data minimization, anonymization, and secure-transfer principles.

This does not mean that collaboration is difficult. Rather, it requires clear internal guidelines and agreements with regulators. Many DSCs are developing standardized reporting templates that avoid unnecessary personal data collection. Youth organizations can adopt these templates, ensuring compliance and protecting the individuals involved.

Ethically, youth organizations must also consider when reporting is appropriate, especially if a young person is reluctant to escalate an incident. NGOs should explain the benefits of involving a regulator, such as stronger platform accountability or access to rapid response mechanisms. At the same time, they should respect the autonomy and emotional wellbeing of the young person. Collaboration with DSCs must always uphold youth protection principles, ensuring that young people receive support that is safe, respectful, and empowering.

Long-Term Partnership and Capacity Building

Effective cooperation with DSCs is not a one-time activity; it is a long-term partnership that evolves as digital risks and platform practices change. To maintain this partnership, youth organizations should invest in building internal capacity — for example, by training staff in DSA procedures, updating reporting protocols, or establishing clear roles within the organization for communication with the DSC.

Youth organizations may also consider applying for **Trusted Flagger** status under the DSA if they meet the criteria. Trusted flaggers receive priority handling of their reports by platforms and maintain a formal relationship with the DSC. Even organizations that do not apply can still contribute meaningfully to enforcement and systemic risk analysis.

Over time, cooperation with DSCs can transform the way youth organizations operate. Instead of working in isolation, they become integrated into national online-safety governance. Their insights help shape enforcement decisions, their data informs national risk assessments, and their preventive programs complement regulatory action. This creates a multi-stakeholder ecosystem in which young people are better protected, harmful content is addressed more effectively, and platforms are held accountable for the digital environments they create.

In conclusion, the Digital Services Act opens a new era for youth-work organizations. By collaborating strategically with Digital Services Coordinators, NGOs can elevate their impact, contribute to systemic change, and ensure that young people in Europe grow up in online spaces that respect their safety, rights, and dignity.