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Policy Digests offer an overview of recent digital policy developments in Digital Policy Lab (DPL) member countries, including regulatory and non-regulatory initiatives aiming to combat online harms such as disinformation, hate speech, extremist or terrorist content. In addition to general updates, each Policy Digest provides a snapshot of topic-specific schemes relevant to the upcoming DPL session.<sup>1</sup>

## Section 1 Digital policy developments

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### Australia: Federal Court dismisses X's appeal to comply with transparency notice issued to Twitter

**Type** Judicial ruling  
**Status** Enforced

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On 31 July 2025, the Full Federal Court unanimously dismissed X Corp.'s appeal, upholding the requirement for the company to comply with an eSafety transparency notice initially issued to Twitter, Inc. in February 2023, requesting information about steps implemented to address child sexual exploitation and abuse material. It was ruled that this obligation remains in effect despite the merger of Twitter into X Corp. in March 2023. The court rejected X Corp.'s claims that these obligations ended with the merger and ordered the company to pay eSafety's legal costs. eSafety's civil penalty proceedings against X Corp. for alleged non-compliance are ongoing.

### Australia: Minister for Communications designates platforms subject to age-restriction rules

**Type** Regulatory  
**Status** Pending

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On 30 July 2025, the Minister for Communications issued the Online Safety (Age-Restricted Social Media Platforms) Rules 2025, designating those platform companies obligated to age verification measures. From 10 December 2025, platforms classified as 'age-restricted social media', including Facebook, Instagram, Snapchat, TikTok, X, and YouTube, will have to prevent individuals under the age of 16 from creating accounts. Failure to comply and taking appropriate measures to enforce the minimum age limit could lead to fines of up to AUD 49.5 million (approximately EUR 27.5 million). Online gaming, messaging apps, health and educational services are exempt from the age verification obligations.

### European Union: Multiple obligations under the EU AI Act come into effect

**Type** Legislative  
**Status** In force

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On 2 August 2025, key provisions of the EU AI Act took effect, covering governance, the role of notified bodies, including their confidentiality obligations, penalties, and requirements for providers of general-purpose AI (GPAI) models. By this date, EU Member States were required to designate their national authorities, establish penalty rules, and begin reporting on resources every two years. Providers of GPAI models already in use must achieve full compliance by 2 August 2027. The Commission has confirmed that adherence to the voluntary General-Purpose AI Code of Practice will be recognised as demonstrating

<sup>1</sup> We welcome any feedback from DPL members regarding additional developments, as well as own submissions from DPL members who wish to be featured in the digest.

compliance with the Act. The Commission will review prohibitions annually, with the option to introduce further rules if codes of practice prove insufficient.

## European Union: Commission issues preliminary DSA findings on Temu and AliExpress

**Type** Regulatory (enforcement)

**Status** Preliminary findings

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On 28 July 2025, the European Commission issued preliminary findings that the e-commerce platform Temu breached its obligations under the Digital Services Act (DSA) by failing to assess and mitigate risks linked to illegal products, such as unsafe toys and non-compliant electronics. In contrast, on 18 June 2025, AliExpress's commitments to address concerns raised in formal proceedings (opened 14 March 2024) have been accepted and made binding. These include risk mitigation, content control, trader traceability, and transparency in advertising. AliExpress will establish a monitoring framework, reporting to an independent trustee, with any breach potentially leading to fines. For more DSA enforcement details, please see section 2 of this policy digest.

## European Union: Commission advances DSA enforcement with new guidelines, data access and transparency obligations

**Type** Regulatory

**Status** In force

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The European Commission has advanced DSA enforcement through several key measures. On 14 July 2025, the Commission published guidelines on the protection of minors online, while on 2 July 2025, it adopted the delegated act on data access to enable responsible research access to platform data. The voluntary Code of Practice on Disinformation, endorsed on 13 February 2025, became auditable from 1 July 2025. Additionally, an implementing regulation, adopted on 4 November 2024, introducing standardised templates for transparency reporting, also entered into force on 1 July 2025.

## France: Authorities launch investigation into alleged foreign interference with X's algorithm

**Type** Criminal (investigation)

**Status** Ongoing

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On 9 July 2025, the Paris Prosecutor's Office submitted a case to the General Directorate of the National Gendarmerie for investigating alleged foreign interference relating to the algorithm on the platform X. This referral follows reports from a Member of Parliament and a senior public official, substantiated by findings from French researchers and various public institutions. The investigation is centred on the platform as a legal entity and involved individuals, concerning organised tampering with the operation of an automated data processing system and organised fraudulent extraction of data from an automated data processing system.

## Germany: Data protection authorities warn Apple and Google about DeepSeek AI app violating the GDPR

**Type** Regulatory (investigation)

**Status** Ongoing

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On 27 June 2025, the Berlin Commissioner for Data Protection and Freedom of Information, the Data Protection Commissioners from Baden-Württemberg, Rhineland-Palatinate, and Bremen, notified Apple and Google that the AI application DeepSeek is illegal content, making it an unlawful service, for transferring vast amounts of personal data from German users to servers in

China, lacking the necessary safeguards as outlined in Article 46(1) of the [General Data Protection Regulation \(GDPR\)](#). Under the DSA, Google and Apple, as hosting platforms, are responsible for ensuring that apps available through their services comply with EU data protection and privacy regulations and may be liable for allowing access to content that breaches these laws. Additionally, they point out that the developer did not comply with a previous request to either remove the application or establish lawful data transfer mechanisms. Consequently, the Berlin Commissioner for Data Protection and Freedom of Information reported the application under [Article 16 of the DSA](#).

## Ireland: Irish Data Protection Commission launches inquiry into TikTok's transfers of EEA user data to China

**Type** Regulatory (investigation)

**Status** Ongoing

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On 10 July 2025, Coimisiún um Chosaint Sonraí, the Irish Data Protection Commission (DPC) [launched](#) an inquiry into TikTok's transfers of EEA users' personal data to servers in China after discovering that some data had been stored there, contrary to TikTok's previous claims of remote access only. This decision follows an earlier inquiry that raised concerns about TikTok's accuracy in reporting. The DPC aims to assess TikTok's compliance with GDPR obligations regarding these data transfers, examining issues of accountability, transparency, and cooperation with regulatory authorities.

## Italy: Competition authority launches investigation into Meta over WhatsApp AI integration

**Type** Regulatory (investigation)

**Status** Ongoing

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On 30 July 2025, Autorità Garante della Concorrenza e del Mercato, the Italian Competition Authority (AGCM), [launched](#) an investigation into Meta for potential violations of Article 102 of the Treaty on the Functioning of the European Union (TFEU). The investigation focuses on alleged abusive practices involving the pre-installation of the generative AI service 'Meta AI' in the WhatsApp app. AGCM has identified separate markets for communication apps and general-purpose AI services, noting Meta's dominant position at both European and national levels. It highlighted that integrating Meta AI into WhatsApp may harm competition by rapidly increasing user numbers and enabling AI model training on user data, leading to exclusionary effects. The investigation is expected to conclude by 31 December 2026, with a 60-day period for Meta to respond after notification.

## United Kingdom: High Court dismisses Wikimedia challenge to OSA

**Type** Litigation

**Status** Final judgment

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On 11 August 2025, the High Court [dismissed](#) a legal challenge by the Wikimedia Foundation to the thresholds for classifying Wikipedia as a 'category 1 service' under the UK's Online Safety Act (OSA), which subjects certain large online platforms to the Act's strictest duties. The court upheld that Wikipedia might be designated as a category 1 service, yet leaves any designation to Ofcom. It found that the Secretary of State had adequately considered user numbers when making the regulations and that the definitions in Regulation 3, while imperfect, were not irrational. Arguments that user verification duties would undermine Wikipedia's collaborative model and claims of European Convention on Human Rights violations were left open for any future challenge following an Ofcom designation.

## United Kingdom: Ofcom investigates 4chan for OSA breaches and issues provisional notice of contravention

**Type** Regulatory (investigation and enforcement)

**Status** Ongoing

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On 10 June 2025, Ofcom launched an investigation into 4chan to evaluate its compliance with the OSA. The inquiry focused on whether 4chan had neglected to respond to statutory information requests, failed to maintain adequate risk assessments for illegal content, and did not uphold safety responsibilities. Subsequently, on 13 August, Ofcom issued a provisional notice of contravention, highlighting breaches linked to non-compliance with information requests under Section 130 of the Act. In its response, 4chan rejected the GBP 20,000 (approximately 23,110 EUR) fine and potential daily penalties, contesting the UK's jurisdiction and seeking intervention from the US government to protect its operations. Lawyers for 4chan and Kiwi Farms have [launched](#) legal action against Ofcom in the US, seeking a Washington DC court order to block Ofcom from applying the OSA in the US.

## United Kingdom: Ofcom investigates pornography websites under OSA age-check rules

**Type** Regulatory (investigation)

**Status** Ongoing

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On 31 July 2025, Ofcom [initiated](#) investigations into four companies, 8579 LLC, AVS Group Ltd, Kick Online Entertainment S.A., and Trendio Ltd, whose collective operations encompass 34 pornography websites that attract over nine million UK users. These investigations assess whether the platforms have implemented effective age verification measures to prevent children from accessing adult content in compliance with the new requirements of the OSA that came into effect on 25 July 2025.

## United Kingdom: Data (Use and Access) Act stage one comes into effect

**Type** Primary legislation

**Status** Enacted

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On 20 August 2025, the Data (Use and Access) Act 2025 (Commencement No. 1) Regulations 2025 came [into effect](#), marking the start of Stage 1 of the Act's four-stage implementation plan, following its Royal Assent on 19 June 2025. This stage introduces technical provisions clarifying the legal framework for data processing, sets out the responsibilities of the Information Commissioner's Office, and establishes reporting requirements for AI use of copyright-protected materials. Key elements include creating a legal framework for data access and sharing, defining business data, establishing a statutory framework for digital verification services, and requiring the development of the National Underground Asset Register, while also addressing the processing of sensitive personal data, automated decision-making, and data subject rights under the UK GDPR and the Data Protection Act 2018.

## United States: Senate Judiciary Committee opens investigation into Meta's AI regarding explicit interactions with minors

**Type** Congressional investigation

**Status** Ongoing

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On 15 August 2025, the Senate Judiciary Committee, led by Senator Josh Hawley, [opened](#) an inquiry into the internal regulations of Meta Platforms concerning generative AI chatbots. This action was prompted by allegations suggesting that the company allowed 'romantic' or 'sensual' interactions with minors. The Committee instructed Meta to preserve all relevant

records and required the submission of various documents by 19 September 2025. These documents include all iterations of its 'GenAI: Content Risk Standards', enforcement guidelines, age verification protocols, risk assessments, incident reports, communications with regulators, and decision-making processes. The investigation aims to establish whether the company's products facilitate the exploitation or deception of children and to evaluate whether Meta has misled the public or regulatory authorities.

## United States: Representative Jimmy Patronis introduced bill to enforce “woke AI” restrictions in federal agencies

**Type** Legislative proposal

**Status** Introduced

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On 5 August 2025, Representative Jimmy Patronis (R-FL) introduced H.R. 4873 in the US House, which aims to solidify Executive Order 14319, 'Preventing Woke AI in the Federal Government'. The bill seeks to ensure that AI systems used by federal agencies comply with standards of factual accuracy and ideological neutrality, particularly avoiding alleged biases linked to diversity, equity, and inclusion (DEI). It instructs the Office of Management and Budget (OMB) to provide guidance on transparency and compliance for federal AI contracts, ensuring that taxpayer-funded AI technologies remain impartial and reliable.

## Global: United Nations launches draft framework for Global Dialogue on AI Governance and an Independent Scientific Panel on AI

**Type** Draft resolution

**Status** Pending implementation

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On 18 August 2025, the United Nations General Assembly adopted draft resolution A/79/L.118 to establish a 40-member Independent International Scientific Panel on AI and an annual Global Dialogue on AI Governance. The Panel will consist of geographically diverse experts serving three-year terms and will produce independent, evidence-based reports on AI's risks and opportunities. The Global Dialogue will gather governments and stakeholders annually, to enhance inclusive and rights-based AI governance, emphasising skills development, alignment of governance frameworks and reducing digital divides. The Secretary-General will oversee support through existing UN channels, encouraging voluntary contributions, particularly from developing countries. Both initiatives will contribute to the Global Digital Compact and may be reviewed at the General Assembly's 82nd session.

## Section 2 Topic-specific snapshot: “Evaluating Online Safety Regulation: Progress, Challenges, and Cross-Jurisdictional Insights”

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*This section summarises selected analyses and responses published by government agencies, civil society organisations and academia on the progress, challenges and cross-jurisdictional insights of online safety regulation with a focus on DPL member countries.*

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### **Online Safety Regulations Around the World: The State of Play and The Way Forward - A Resource Guide,**

*Mariana Olaizola Rosenblat, Ayushi Agrawal, Isaac Yap, NYU Stern Center for Business and Human Rights, 2025*

This report from April 2025 examined a wide range of legislative and regulatory instruments on online safety and digital governance across 19 jurisdictions. The comparative analysis addresses how different governments are addressing harmful content, increasing protection of minors online, and imposing responsibilities on digital platforms.

Over the past two years, there has been a notable increase in such measures, such as the implementation of the DSA and Digital Markets Act (DMA) in the European Union. The report highlights that countries such as Australia, Ireland, New Zealand, and several regions within Asia and Oceania have also introduced robust legislation aimed at regulating digital platforms. In contrast, the United States has seen efforts primarily at the state level.

Key findings of the report indicate a growing global consensus on the need for stringent regulations to ensure online safety. It identifies 26 distinct online safety regulations across 19 jurisdictions, specifically constitutional democracies, thereby creating a framework to understand the current landscape of regulations affecting online services. This highlights the obligations imposed on online platforms to mitigate various risks.

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### **Report of the Statutory Review of the Online Safety Act 2021,**

*Delia Rickard PSM, Department of Infrastructure, Transport, Regional Development, Communications, Sport and the Arts, 2024*

The Statutory Review of the Online Safety Act 2021, published in February 2025, assessed how effective the Act is in protecting Australians online, and proposed reforms to improve it. The review found that the Act has provided a solid basis, yet online harms are changing quickly, requiring a more proactive regulatory approach.

It presents 67 recommendations, including refining the Act’s objectives to focus on human rights, risks to young people, evidence gathering, harm prevention, and greater responsibility and transparency from service providers. A key recommendation is the implementation of a digital duty of care, which would require online service providers to take reasonable steps to identify, prevent, and mitigate foreseeable harms. This would involve incorporating safety into platform design and would be supported by mandatory transparency reporting, annual risk assessments, and compliance audits, especially for those platforms most used in Australia.

The review also called for stronger enforcement powers for regulators, including fines of up to AUD 10 million (approximately EUR 5.56 million) or 5% of global annual turnover, to ensure compliance with safety standards and content removal. To support such a regime, the review proposed replacing the single eSafety Commissioner model with a more powerful Online Safety Commission, similar to the Australian Competition and Consumer Commission (ACCC). This body would be able to create mandatory codes, carry out proactive investigations, and enforce stricter penalties. The move is from a reactive, user-complaint-based system to a proactive approach that emphasises prevention, accountability, and transparency from platforms. The government has already committed to legislating a Digital Duty of Care, while broader reforms such as the new Commission model and expanded regulatory powers are currently being discussed.

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### **Supervision of the designated very large online platforms and search engines under DSA,**

*European Commission, 2025*

This website by the European Commission outlines all enforcement activities of the designated Very Large Online Platforms (VLOPs) and Very Large Online Search Engines (VLOSEs) under the DSA. It also provides further details on the relevant VLOPs and VLOSEs, which the European Commission oversees. The enforcement activities of smaller intermediary services would be communicated by the relevant national Digital Services Coordinator (DSC), who oversees the relevant service provider under the DSA.

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### **Summary Report: 2025 European Rights & Risks: Stakeholder Engagement Forum,**

*Global Network Initiative, 2025*

The joint summary report by the Global Network Initiative (GNI) and the Digital Trust & Safety Partnership (DTSP) highlights the key themes, learnings and recommendations from the '2025 European Rights & Risk: Stakeholder Engagement Forum', which was held in Brussels on 3 and 4 June 2025, and brought together over 75 participants from industry, civil society and academia. Industry representatives included eight tech companies, responsible for 14 designated VLOPs and VLOSEs.

Key themes include:

- Embedding human rights-based approaches into risk assessments, mitigation measures, and enforcement under the DSA.
- Recognising the interplay between product design, platform functionality, and mitigation strategies, and ensuring this interaction is well understood for effective risk management.
- Integrating stakeholder insights on risk areas and mitigation strategies, particularly regarding the proportionality of government actions, to refine assessments and ensure all voices are heard in decision-making.
- Using data and metrics to evidence the validity, effectiveness, and continuous improvement of risk management practices over time.
- Addressing ongoing tensions around meaningful stakeholder engagement, which remain a central concern.

- Clarifying the perceived and actual roles of DSA audits in risk assessment processes, as greater certainty is needed to foster trust and accountability.
  - Ensuring rights-respecting coherence in the design of risk-based online regulatory frameworks through ongoing collaboration and the integration of diverse perspectives.
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### The UK's Video-Sharing Platforms Regime – A Retrospective,

*Ofcom, 2025*

This Ofcom blog post reflects on the last five years of the UK's Video-Sharing Platforms (VSP) regime, which came into effect on 1 November 2020, mandating platforms based in the UK to protect users from harmful or illegal video content, with specific responsibilities to safeguard those under 18 and to ensure that advertising adhered to established standards. These obligations covered incitement to violence or hatred, criminal offences such as terrorism and child sexual abuse, and content likely to harm the physical, mental, or moral development of minors.

In 2021, the regulator Ofcom issued guidance, which included compliance tools, industry roadmaps, and confirmation of the Advertising Standards Authority as a co-regulator for advertising. Its regulatory plan aimed to enhance user safety standards, address criminal and harmful content, improve age verification and reporting mechanisms, and prepare both industry and Ofcom as the regulator for the implementation of the Online Safety Act (OSA). To support industry understanding, Ofcom also published simplified guidance and practical summaries and began proactive supervisory engagement with all notified VSPs.

In its retrospective analysis, Ofcom highlights key lessons for future regulation: all obligations apply equally to platforms, transparency and timely information-sharing are essential, supervision will be prioritised while enforcement will be applied when necessary, and public accountability influences reputation. It also stressed that poor standards by one service could not be justified by similar practices elsewhere, and that proactive, constructive engagement with Ofcom could mitigate regulatory risk. These insights now underpin Ofcom's OSA approach, ensuring continuity of protection while expanding the scope of regulatory oversight.

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### OSA Implementation Timeline,

*Online Safety Act Network, 2025*

This resource by the Online Safety Act Network outlines the implementation timeline for the UK's OSA. The OSA, which received Royal Assent in October 2023, is being implemented in phases from late 2024 to 2026. Ofcom, the responsible regulator, began issuing guidance and statutory codes in late 2024, focusing initially on duties related to illegal harms.

- **December 2024:** Ofcom published risk-assessment guidance, enforcement frameworks, and codes of practice, requiring services to complete their first illegal content risk assessment within three months.
- **January 2025:** Duties relating to children's access assessments came into force, following Ofcom's release of guidance on age assurance and children's access in early 2025.

- **16 March 2025:** Duties concerning illegal harms became fully enforceable, marking the start of active enforcement.
- **April 2025:** Ofcom issued children's codes of practice and accompanying risk-assessment guidance, triggering the next stage focused on child protection, with related duties taking effect.
- **25 July 2025:** Children's safety duties became fully operational, obliging services accessible to children to conduct risk assessments and adopt secure measures such as effective age assurance and content moderation.
- **Late 2025:** Ofcom is expected to publish categorisation registers and guidance on transparency and on protecting women and girls, while the Department for Science, Innovation and Technology (DSIT) will consult on researcher access provisions.
- **2026 onwards:** Further transparency measures, consultations on new duties for categorised services, and revised illegal harms codes are anticipated, completing the staged implementation of the Act.

#### **About the Digital Policy Lab**

The [Digital Policy Lab \(DPL\)](#) is an inter-governmental working group focused on charting the regulatory and policy path forward to prevent and counter disinformation, hate speech, extremism and terrorism online. It is comprised of a core group of senior representatives of relevant ministries and regulators from key liberal democratic countries. The DPL aims to foster inter-governmental exchange, provide policymakers with access to sector-leading expertise and research, and build an international community of policy practice around key regulatory challenges in the digital policy space. We thank the Alfred Landecker Foundation for their support for this project.