



COUNTERING HARMFUL CONTENT AND DISINFORMATION ONLINE

Takeaways

SEEDIG SESSION

10 October 2025, Athens

Countering harmful content and disinformation remains one of the Council of Europe's top priorities. The importance of ensuring a safe and trustworthy digital environment is highlighted in the [Report 2025 of the Secretary General: "Towards a New democratic Pact for Europe"](#) which recalls the [Reykjavik Principles for Democracy](#) and emphasises the urgent need to resist democratic backsliding, polarisation, and disinformation—both online and offline.



The [New Democratic Pact for Europe](#) will offer a comprehensive framework to confront these pressing challenges. Conceived as a strategic and inclusive process, the Pact will apply the common parameters agreed at the Reykjavík Summit to assess and strengthen democratic systems across Europe. It will engage governments, civil society organisations, and citizens turning dialogue into action through concrete reforms and innovative practices aimed at making democracy more resilient.

Regulators, national authorities, and experts from Greece, Bosnia and Herzegovina, and Albania exchanged experiences and promoted coordinated approaches to counter harmful content and disinformation online. Discussions focused on prebunking and debunking disinformation as key approaches to strengthening societal resilience. Exchanges covered Council of Europe instruments and upcoming initiatives on information integrity and media and information literacy (MIL), as well as challenges in aligning national frameworks with Council of Europe and EU standards, particularly under the Digital Services Act (DSA).

Participants emphasised the need for cooperation between authorities and civil society to ensure effective DSA implementation and addressed the persistent difficulty of identifying online hate speech perpetrators. The session concluded with reflections on AI's regulatory implications, reaffirming that regional and European cooperation—and a human-rights-based approach—are essential to ensuring accountability and protecting users online.

Key Takeaways

- The **Council of Europe** has a **robust standards and case law** to counter the spread of disinformation and harmful content online. In recent years, a series of international legal and soft-law instruments have been adopted to address these challenges and strengthen the protection of human rights and democracy in the digital environment.
- The European Union also disposes of a comprehensive legal framework designed to tackle disinformation. The **Digital Services Act (DSA)** establishes clear responsibilities for online platforms; introduces concrete tools such as risk assessments, risk mitigation measures, and crisis response mechanisms to ensure a safer and more transparent online space. Complementing this, the Regulation (EU) 2024/900 on the **Transparency and Targeting of Political Advertising (TPA)** seeks to prevent information manipulation and foreign interference in electoral processes through enhanced transparency and accountability requirements.
- Regulators should encourage **platform-based solutions** and **human-rights impact assessments** for platforms and support **independent public service media and quality journalism** as safeguards against disinformation.
- It is important to enhance **cross-institutional cooperation** and create coherent **national strategies** to counter harmful content and disinformation online. Effective enforcement requires **organisational adaptation, multi-stakeholder governance, and transparent decision-making**. Governments, regulators, platforms, civil society, journalists, and academia must work together to build trust, resilience, and accountability in the digital ecosystem.
- Balkan regulators face similar challenges in addressing online disinformation while safeguarding freedom of expression. **Regional and European cooperation** remain essential, particularly for addressing the responsibilities of platforms operating outside EU jurisdictions.
- **Media and Information Literacy (MIL)** is central to resisting disinformation. Greek initiatives such as “*Mesa sta Mes@*” and the pilot programme “*Cultivating Critical Readers*” illustrate how education systems can foster critical thinking. MIL strategies should be **systematic, long-term, and inclusive** of vulnerable groups, including youth, elderly people, and persons with disabilities.
- As technology evolves faster than regulation, the regulation of AI cannot fall under a single authority but requires **inter-agency coordination**, the setting of **clear priorities**, and the **strengthening of institutional capacities**.
- **Online hate speech** is especially devastating due to its speed, reach, and permanence. Stronger alliances and synergies (e.g., the No Hate Alliance in Albania) are needed to protect victims and empower targeted groups.

Summary of interventions

I. Council of Europe Standards on countering Harmful Content and Disinformation online

A set of international instruments, such as the Framework Convention on Artificial Intelligence, the Budapest Convention on Cybercrime, and a wide body of soft law instruments provide guidance on addressing disinformation while upholding human rights, democracy, and the rule of law.

The impact of disinformation extends beyond information integrity, affecting users and society. Building on the [Information Disorder](#) report, which offered one of the first comprehensive analyses of this phenomenon in the digital age, the Council of Europe issued in 2023 a [Guidance Note addressing the spread of online mis- and disinformation](#). This document focuses on three key pillars—fact-checking, platform design, and user empowerment and offers practical recommendations to support states, platforms, the media and other relevant stakeholders to fight disinformation in a human-rights compliant manner.

Beyond these tools, Council of Europe promotes **proactive resilience** measures and is currently preparing a [Guidance](#) setting out **comprehensive strategies to strengthen information integrity**. At the same time [Guidelines](#) are being developed to help member states adopt **effective national media and information literacy strategies** that will empower individuals and societies to resist information manipulation and distortion.

In September 2025, under Malta’s Presidency of the Committee of Ministers, the Council co-hosted a high-level conference on “Building Democratic Resilience to Disinformation.” The [event](#) highlighted the role of parliaments, international cooperation, transparent media, self-regulation, and education in fostering resilience. The conference also launched the Council of Europe’s new project [RESIST: Strengthening Societal Resilience to Disinformation in Europe](#), funded by the EEA and Norway Grants. This initiative aims to help states to strengthen resilience and empower people through media literacy, education, youth, cultural, and other policies.



Through its [cooperation projects](#), the Council of Europe is providing policy advice, legal opinions, training and capacity building to strengthen the countries’ capacities to counter and build resilience against disinformation and other harmful online phenomena.

II. National perspectives

Greece:

Representatives from the **Hellenic Telecommunications & Post Commission (EETT)**, and the **National Council for Radio and Television (NCRTV)** highlighted key initiatives and regulatory measures to enhance accountability, transparency, and user empowerment in the digital environment.

- The **DSA** establishes clear responsibilities for online platforms; however, stronger cooperation between national authorities and civil society organisations (CSOs) is needed for its effective implementation.
- Greece noted the importance of the **Code of Conduct on Hate Speech** and the **Code of Conduct on Disinformation**, aimed at strengthening accountability and transparency in content moderation.

- The **EMFA** puts in place a new set of rules to protect media pluralism and independence of journalists in the EU and enhance transparency of media ownership while the **TTPA** builds on the **DSA** and other EU legal instruments and introduces transparency obligations for actors (including political persons) that are involved in the creation, publication and dissemination of political advertisements with the aim to support open and fair political debate and address issues of information manipulation and foreign interference during election periods. **Transparency in political advertising** was underlined as essential, ensuring that users can identify sponsored content and its sources. The TTPA Regulation requires advertisers to clearly, identify political content, including indirect or non-traditional messages. **Transparency of Media Ownership** on the other hand is essential to ensure that users understand who influences the content they consume (**article 6 EMFA**). In addition, **article 20 of the European Media Freedom Act (EMFA)** gives users the right to modify content preferences and settings by default, promoting proactive choices while safeguarding freedom of choice.
- Challenges remain in implementing **Article 7 of the Audiovisual Media Services Directive (AVMSD)**, concerning the prominence of services of general interest.

Interventions from the **Former President of the Hellenic Telecommunications & Post Commission (EETT)**, and the **Head of Department for Audiovisual Media and Internet at the General Secretariat of Communication and Media in Greece** focused on:

- The **ineffectiveness of establishing a single overarching authority** to regulate the digital environment, given that technological innovation evolves faster than regulatory frameworks. The regulation of AI cannot fall under a single authority; rather, it requires inter-agency cooperation, the establishment of clear priorities, and the development of institutional capabilities.
- The **growing influence of online platforms** as major market players, with the **Digital Services Act (DSA)** recognised as a significant step toward greater transparency and accountability.
- The continued **challenges of content moderation**, and the potential role of **artificial intelligence (AI)** in improving its effectiveness.
- The recent publication of a collective study on Artificial Intelligence, Human Rights and Rule of law in Greece examining the proposal to introduce a **new constitutional article dedicated to the fair and ethical use of AI**.
- The presentation of **Media and Information Literacy (MIL) initiatives** targeting students and parents, including the use of AI tools to promote safe and responsible technology use.
- The launch of a **new pilot Media Literacy Program, “Cultivating Young Readers,”** for the 12–18 age group, featuring interactive workshops for educators and journalists in Greece. The Program is developed by the General Secretariat of Communication and Media in cooperation with the Ministry of Education.
- The **draft bill on the European Media Freedom Act (EMFA)**, currently under public consultation in Greek Parliament.
- The **need for a comprehensive national media strategy** and continued engagement in **international initiatives**, including contributions to the Council of Europe’s Steering Committee on Media and Information Society (CDMSI) and the Committee of Experts on online safety and empowerment of content creators and users (MSI-eSEC).

Bosnia and Herzegovina:

The representative of the **Communications Regulatory Agency (CRA)** of Bosnia and Herzegovina outlined the Agency's competences, the main challenges faced in countering disinformation, and possible avenues to strengthen regulatory and institutional responses.

- The CRA has adopted a set of **by-laws implementing the revised AVMSD**, including the **Rule on Video-sharing Platform Services**, which extends the Agency's remit to video-sharing platforms under Bosnia and Herzegovina's jurisdiction. The **Rule on Internet Service Providers (ISPs)** prohibits ISPs from restricting access to publicly available online content and services unless deemed harmful or illegal by a competent authority. To date, no such cases have been recorded.
- The **DSA** represents a major step forward within the EU; however, its scope remains limited to EU member states. As a country on the **EU accession path**, Bosnia and Herzegovina—like other Western Balkan countries—is expected to align its digital regulatory framework with the **DSA** and the **Digital Markets Act (DMA)**. The Council of Europe supports these efforts through its Cooperation Programmes in Bosnia and Herzegovina, assisting national institutions in meeting European standards in the field of digital governance and online content regulation.
- In Bosnia and Herzegovina, as well as in other Western Balkans countries a **comprehensive legal framework and effective enforcement mechanisms** are needed to counter harmful content such as 'disinformation' more effectively.
- **Key recommendations and proposed actions included:**
 - Establishing a **clear legal framework** to address disinformation.
 - Ensuring that **alignment with the DSA and DMA** is carried out through a **cross-sectoral, inclusive, and participatory national process**.
 - Promoting **regional cooperation** to enhance accountability and strengthen joint responses.
 - Drawing on the **experience and expertise of EU member states** to support regional implementation of the DSA.
 - Defining **institutional responsibilities** and ensuring the **active involvement of civil society organisations** to guarantee transparent and accountable processes.
 - Providing **adequate financial, human, and technological resources** to support implementation.
 - Initiating **structured cooperation with online platforms**.

Albania:

The **Commissioner for Protection from Discrimination of Albania** highlighted the strong link between **disinformation and hate speech**, noting that both can perpetuate harmful narratives and reinforce discrimination.

- The **Commission** addresses concrete complaints submitted by individuals and civil society organisations, conducting investigative procedures and its **decisions are legally binding**.

- While traditional forms of hate speech are relatively straightforward to address, identifying **online perpetrators** and assigning **responsibility** remains a significant challenge.
- To tackle these issues, the Commission has built **alliances with other institutions**, including close cooperation with the **Ombudsperson**, and carries out **awareness-raising activities** targeting journalists and students to enhance understanding of the impact of hate speech.
- Recent **amendments to the Law on Audiovisual Media** introduced new provisions on hate speech, while the **Code of Conduct for Journalists** now includes specific rules addressing this issue.
- The Commission conducted a **study on hate speech in times of crisis**, drawing on the **Council of Europe's recommendations** for assessing the severity of hate speech.
- Overall, cooperation among institutions and stakeholders remains essential to effectively address and prevent hate speech.

Panelists:

- **Alina Tatarenko**, *Head of Division for Cooperation on Freedom of Expression, Council of Europe*
- **Persa Lampropoulou**, *Legal Advisor to the National Council for Radio and Television (NCRTV) Greece*
- **Ioanna Choudalaki**, *Director of Digital Services at Hellenic Telecommunications & Post Commission (EETT), Greece*
- **Azra Maslo**, *Programme standards coordinator at Communications Regulatory Agency (CRA), Bosnia and Herzegovina*
- **Robert Gajda**, *Commissioner for Protection from Discrimination of Albania*

Other interventions:

- **Leonidas Kanellos**, *Attorney at Law, Electronic communications, competition law and policy, Former President of the Hellenic Telecommunications & Post Commission (EETT), Greece*
- **Aikaterini Polyzou**, *Head of Department for Audiovisual Media and Internet, Presidency of the Government, General Secretariat of Communication and Media, Greece*
- **Yiannis Ketentzian**, *Public Officer, Audiovisual Media and Internet, Presidency of the Government, General Secretariat of Communication and Media, Greece*

Further reading:

- [Guidance Note on Countering Online Mis/Disinformation through Fact-Checking and Platform Design solutions in a human rights compliant manner \(2023\)](#)
- [Recommendation CM/Rec\(2022\)13 of the Committee of Ministers to member States on the impacts of digital technologies on freedom of expression](#)
- [Recommendation CM/Rec\(2022\)16 of the Committee of Ministers to Member States on combating hate speech](#)
- [Recommendation CM/Rec\(2022\)4 of the Committee of Ministers to Member States on promoting a favourable environment for quality journalism in the digital age](#)
- [Recommendation CM/Rec\(2022\)12 of the Committee of Ministers to Member States on electoral communication and media coverage of election campaigns](#)
- [Recommendation CM/Rec\(2018\)2 on the roles and responsibilities of internet intermediaries.](#)
- [Resolution 2255 \(2019\) on the Role of Public Service Media in the Context of Disinformation and Propaganda:](#)
- [Resolution 2323 \(2020\) on Propaganda and Freedom of Information in Europe:](#)
- [Resolution 2567 \(2024\) on Propaganda and Freedom of Information in Europe](#)
- [Resolution 2590 \(2025\) on Regulating Content Moderation on Social Media to Safeguard Freedom of Expression](#)
- [PACE Report on Foreign interference a threat to democratic security in Europe](#)
- [The Role of Regulators in Countering Harmful Content - Western Balkans Regional Peer Exchange for Regulatory Authorities, Report prepared within the action 'Protecting Freedom of Expression and of the media in The Western Balkans' \(PRO-FREX\)](#)
- [Towards coregulation of harmful content online in Bosnia and Herzegovina. A study of European standards and co-regulatory practices for combating harmful content online.](#)
[A study of European standards and co-regulatory practices for combating harmful content online](#)