



Coimisiún  
na Meán

# Engagement with Civil Society Organisations

## Pilot Programme

## Guidance Document

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# 1. Purpose of document

Coimisiún na Meán (“**An Coimisiún**”) has developed this Guide to inform Civil Society Organisations (“**CSOs**”) of how to submit information on matters relevant to its Online Safety Framework. The aim of the Guide is to enable and support CSOs to engage with the Online Safety Framework by providing information that may assist An Coimisiún with gaining a deeper understanding of issues facing citizens and their rights online, technological or digital developments that impact on citizens and regulated entities’ compliance with their obligations.

Frequently Asked Questions (“**FAQs**”) are contained in Annex 1 of the Guide. FAQs should be read in conjunction with the Guide.

Please note that this Guide does not constitute legal advice nor does it provide statements on the law. The Guide is not binding on An Coimisiún. An Coimisiún reserves the right to amend and update the Pilot Programme, including any relevant processes, as it sees fit. Similarly, this Guide may be updated and amended by An Coimisiún as considered necessary and appropriate.

## 2. Introduction

In the course of its work, An Coimisiún engages regularly with a wide range of stakeholders, including CSOs, industry and the public, to inform its regulatory and policy activities and funding initiatives. Examples of such engagements include the development of the Online Safety Code and Broadcasting and Media Codes, the development of the Journalism Scheme and the distribution of funding to support media literacy projects.

A very important strand of this engagement is the engagement with CSOs, who may share information, including research, on matters relevant to the Online Safety Framework (“**OSF**”). This framework holds digital services accountable for how they protect people, especially children, from harm online. The OSF is primarily made up of three laws which are targeted at online platforms: the [Digital Services Act \(“\*\*DSA\*\*”\)](#), the [Terrorist Content Online Regulation](#) and the [Online Safety and Media Regulation Act](#), which allowed for the introduction of the [Online Safety Code](#). Coimisiún na Meán also supervises certain obligations under the Transparency and Targeting of Political Advertising Regulation (TTPA) and will be enforcing certain obligations under the EU Artificial Intelligence (AI) Act from August 2026.

To enhance the collection and use of such insights, An Coimisiún has developed a Pilot Programme to establish a structured approach for receiving, reviewing, and utilising information received from CSOs. Participating in the CSO Pilot Programme offers CSOs a unique opportunity to help shape the future of online safety regulation in Ireland and the EU. By making a submission, CSOs can inform policy and regulation, make an impact by highlighting systemic issues and shape future engagement with An Coimisiún.

### 2.1 Information about the Pilot Programme

The Pilot Programme will run for 18 months, starting from **2 June 2026** to **2 December 2027**. During the Pilot Programme, An Coimisiún reserves the right to amend the programme as it sees fit including:

- to close the Pilot Programme earlier,
- to limit the number of submissions to the Pilot Programme,
- to amend the eligibility conditions regarding participation in the Pilot Programme, and
- to amend the type of information that it requests to be included in submissions.

Advance notice of such amendments will be given by way of information published on our website and on our social media channels.

During the Pilot Programme, CSOs are invited to make submissions to An Coimisiún as outlined in section 5 of this Guide. Subject to submissions and queries received, An Coimisiún will consider whether it is necessary to hold an additional information session. Details about future information session(s) will be published on our website and social media channels.

Submissions received during the Pilot Programme will be reviewed by relevant teams in An Coimisiún. Further information about how the information contained in submissions will be utilised is outlined in section 7 of this Guide. It is important to note that submissions should relate to a systemic issue and be supported by clear and reliable sources of information and research. The Pilot Programme will focus on systemic matters that are relevant to the functions and strategic outcomes of An Coimisiún. The Pilot Programme is not an avenue for raising individual complaints or issues related to individual items of content.

Upon completion, An Coimisiún will conduct an evaluation of the Pilot Programme and may consider holding a final information session to inform participants and other interested parties of the outcomes of the Pilot Programme. Any relevant information in this regard will be published on our website and social media channels.

### **3. Who can participate in the Pilot Programme**

Conditions regarding eligibility are outlined below.

3.1 Participation in the Pilot Programme is limited to CSOs. CSOs are considered to have the following characteristics:

- i) Independent,
- ii) Not for profit and/or voluntary,
- iii) Public interest oriented, representing societal interests.

3.1.1 Independence: submitting organisations should not be controlled or mandated by government bodies or commercial entities. The aim of the Pilot Programme is to gather impartial insights that reflect societal needs and are relevant to the functions and strategic outcomes of An Coimisiún.

3.1.2 Not for profit and/or voluntary: submitting organisations should not be a for-profit organisation and should represent public interest with a strong track record of advocating for societal issues, including online safety. Their proximity to communities and lived experiences enables them to provide systemic insights and evidence on harmful trends that directly affect users, which is critical for shaping effective policy and regulatory responses.

3.1.3 Public interest orientation: activities of the submitting organisations should be directed towards benefitting society, such as improving online safety, protecting vulnerable groups, or promoting inclusion and diversity.

Examples of CSOs include charities focused on online safety, advocacy groups promoting digital rights, research institutes investigating online harms, and community organisations supporting diversity and inclusion. For-profit companies, organisations that are primarily commercial, government agencies, or industry lobby groups do not fall within this definition for the Pilot Programme.

3.2 As part of the assessment of submissions, An Coimisiún may ask for further information on any aspect of the submission, including funding sources and governance arrangements.

3.3 CSOs who intend to make submissions will be screened for eligibility when the submission is made. There will be no pre-submission screening.

3.4 Submissions will be accepted from CSO regardless of jurisdiction, provided that the information submitted meets the requirements set out in section 5 of this Guide.

3.5 Coalitions or groups of CSOs can make joint submissions provided that a lead CSO is designated as the main point of contact.

3.6 If an organisation is unsure whether they are a CSO or whether the topic of their submission is relevant, it may contact An Coimisiún using the email address set out in section 5 of this Guide.

## 4. Type and scope of information contained in submissions

Conditions regarding the type and information contained in submissions are outlined below.

4.1 Submissions must be written in English or Irish (Gaeilge).

4.2 Submissions must be based solely on evidence collected from 17 February 2024 onwards. 17 February 2024 is the date when the DSA became fully applicable to all in-scope services across the European Union.

4.3 The information contained in submissions should be relevant to An Coimisiún's functions and regulatory remit and should relate to at least one of the of An Coimisiún's strategic outcomes, as outlined in the [Strategy Statement 2025-2027](#): Children, Democracy, Trust, Diversity and Inclusion, Public Safety and Irish Culture and Media.

4.4 The information contained in submissions must relate to issues affecting online users or individuals living in Ireland or the European Union and should concern an entity (entities) or digital service(s) regulated by An Coimisiún under the OSF, such as video sharing platform services.

4.5 Submissions can be made both in respect of content and / or features of entities or digital services regulated by An Coimisiún under the OSF.

4.6 Submissions must relate to a systemic issue and be supported by clear, reliable evidence and sources of information and research. Evidence should be collected through robust and widely approved methodologies such as, but not limited to, analysis of data from frontline services, qualitative and / or quantitative research with online users or expert organisations.

4.7 The Pilot Programme will focus on systemic matters that are relevant to the functions and strategic outcomes of An Coimisiún. The Pilot Programme is not an avenue for raising individual complaints or issues related to individual items of content. Where it is considered that the submission appears to be a complaint under the DSA, An Coimisiún will contact the CSO who made that submission to discuss next steps.

4.8 CSOs are advised that it may be possible that they receive no further engagement or feedback in respect of submissions shared with An Coimisiún in the context of the Pilot Programme. This is to ensure, for example, that the integrity of An Coimisiún's processes and procedures (including investigations) are preserved.

4.9 The following material **should not** be included in submissions:

- i) personal data, except personal data of the person making the submission on behalf of the CSO (e.g., name, signature, contact details). An Coimisiún will delete irretrievably submissions containing personal data, except personal data of the person who is making the submission on behalf of the CSO. In such situations, An Coimisiún will inform the CSO that the submission has been deleted as it contained personal data.
- ii) media (including screenshots) containing (potentially) illegal content, including but not limited to: Child Sexual Abuse Material (CSAM), Non-Consensual Intimate Images and Terrorist Content Online.

## 5. How to make a submission

5.1 Interested parties can send their submissions to [CSOSubmissions@cnam.ie](mailto:CSOSubmissions@cnam.ie). Upon submission, the submitting party will receive an acknowledgement and a reference number. Submitting parties should use the reference number assigned to the original submission for any further submissions where these relate to the original submission.

5.2 The submission should comprise the following documents:

- i) The Self-Declaration and Submission Form. The Self-Declaration and Submission Form can be downloaded from An Coimisiún's CSO [dedicated webpage](#).
- ii) If applicable, a statement explaining which sections or information contained in the submission the CSO considers should not be disclosed under the Freedom of Information Act 2014 and why,
- iii) If applicable, a statement explaining whether the CSO considers that all or some of the information contained in the submission is relevant to one or more of An Coimisiún's ongoing investigations.

5.3 CSOs may make joint submissions. For joint submissions, **each of the CSOs** involved in the joint submission is required to fill in Parts A, D, E and F of the Self-Declaration and Submission Form.

5.4 If a new submission is made within 12 months from the date of the original submission, you will not be asked to complete the Self Declaration form again. You will, however, be asked to disclose whether any changes have occurred within your organisation in the intervening period, which may impact on the eligibility criteria of the Pilot Programme.

5.5 All queries in respect of the submission(s) made should be directed to the same email address [CSOSubmissions@cnam.ie](mailto:CSOSubmissions@cnam.ie), with the reference number assigned to the submission.

## 6. Engagement with the submitting party after submission is made

6.1 Submitting parties can send queries in relation to submissions made during the Pilot Programme. Queries should be submitted in line with instructions outlined in section 5 of this Guide.

## 7. Disclosure of submissions and compliance with laws

7.1 An Coimisiún will handle all submissions it receives in the context of the Pilot Programme in accordance with applicable laws including but not limited to data protection laws.

7.2 An Coimisiún may acknowledge or recognise that your organisation has participated in the Pilot Programme, for example in general communications or summary reports about the Pilot Programme's progress.

7.3 An Coimisiún may disclose submissions and/or information contained in submissions to third parties either by operation of law or otherwise. In such cases, An Coimisiún will comply with all relevant legal obligations.

7.4 For example, An Coimisiún may share submissions and/or information contained in submissions voluntarily with third parties, such as the European Commission and other Digital Services Coordinators. In this case, the relevant CSO will be consulted prior to the information being shared.

7.5 An Coimisiún is subject to the Freedom of Information Act 2014, as amended, ("**FOI Act**") and therefore any submissions received during the Pilot Programme may come within scope of a request made under this legislation. If a CSO considers that its submission contains information that should not be disclosed upon receipt of a Freedom of Information request, the CSO making that submission is requested to clearly identify the relevant information in the submission and explain why this information should not be disclosed under the FOI Act. An Coimisiún will consult with CSOs, as appropriate, in line with the provisions of the FOI Act.

7.6 Submissions will be held on file for a period of 12 months from the submission date.

# Annex 1 Frequently Asked Questions

## 1. What is a Civil Society Organisation in the context of the Pilot Programme?

The Pilot Programme is designed to engage organisations that play a vital role in representing the interests of society, advocating for positive change, and supporting communities. For the purposes of this Pilot Programme, a Civil Society Organisation (“**CSO**”) is defined as an independent, non-governmental, not-for-profit, and voluntary organisation that operates for the public good. CSOs are typically driven by a mission to address social, cultural, or community issues, rather than pursuing commercial or governmental objectives. Examples of CSOs include charities focused on online safety, advocacy groups promoting digital rights, research institutes investigating online harms, and community organisations supporting diversity and inclusion. For-profit companies, organisations that are primarily commercial, government agencies or industry lobby groups do not fall within the CSOs description outlined above for the purpose of the Pilot Programme.

## 2. Who can participate in the Pilot Programme? Requirements and eligibility criteria

To ensure the Pilot Programme is effective and relevant, certain requirements and eligibility criteria have been established for participating organisations:

- a) **CSO Status:** Your organisation must meet the definition of a CSO as described at Question 1: independent, not-for-profit, and focused on the public interest.
- b) **Independence:** Organisations should not be controlled or mandated by government bodies or commercial entities. The aim is to gather impartial insights that reflect societal needs and are relevant to how we regulate and respond to areas related to our strategic outcomes.
- c) **Public interest orientation:** Activities should be directed towards benefiting society, such as improving online safety, protecting vulnerable groups, or promoting inclusion.
- d) **Jurisdiction:** Submissions must relate to issues affecting individuals in Ireland or another European Union member state and entities regulated by An Coimisiún. This ensures the information is relevant to An Coimisiún’s regulatory responsibilities.
- e) **Language:** Submissions must be provided in English or Gaeilge.
- f) **Funding transparency:** Organisations are asked to declare any sources of funding, both for the organisation as a whole and for the specific submission. This information is requested for transparency.
- g) **Joint submissions:** Coalitions or groups of CSOs are welcome to submit jointly, provided a lead CSO is designated as the main point of contact and all CSOs complete Parts A, D, E and F of the Self Declaration and Submission Form. It is important to note that receiving funding from external sources, including regulated entities, does not prevent participation. The key requirement is transparency.

## 3. Can CSOs outside Ireland make submissions?

Yes. CSOs based outside Ireland may participate if their submissions relate to Irish or EU users and entities regulated by Coimisiún na Meán including hosting services, online platforms, video sharing platforms.

#### 4. What type of information can be submitted? Criteria for submissions

The Pilot Programme seeks to gather high-quality, evidence-based information that can help An Coimisiún understand and address systemic issues in online safety. When preparing your submission, please consider the following criteria:

**Strategic Relevance:** Submissions should address one or more of An Coimisiún's strategic outcomes: Children, Democracy, Trust, Diversity and Inclusion, Public Safety, and Irish Culture and Media. For example, you might highlight emerging risks to children online, trends in disinformation affecting democratic processes, or barriers to inclusion for minority groups. For further information on our strategic outcomes, please see our [Strategy Statement 2025-2027](#).

**Systemic focus:** The Pilot Programme is designed to identify existing or emerging systemic issues, rather than individual instances of potentially illegal and/or harmful content. Systemic issues may include:

- Patterns or trends observed over time,
- Recurring problems across a single or multiple regulated entities or services
- Gaps in existing regulation or enforcement
- Emerging risks not yet widely recognised

**Evidence-based insights:** Submissions should relate to a systemic issue and be supported by clear, reliable evidence. The Pilot Programme is intended to focus on systemic matters that support the work of An Coimisiún generally (including policy development), rather than resolving individual grievances. Evidence should be collected through robust methodologies, such as analysis of data from frontline services, qualitative research with online users or expert organisations, or quantitative research conducted with these groups. Please describe your methodology clearly, including how information was collected, sample sizes, data sources, and any limitations or uncertainties. Observations from front line services, such as trend analysis regarding service user contacts and thematic areas of concern are also relevant and welcomed.

**Format and structure:** Use the standardised Self-Declaration and Submission Form provided. Clearly indicate the topic, methodology, and classification of your submission. Submissions should be concise, well-structured, and written in English or Gaeilge.

**Exclusions and safeguards:** Do not include personal or sensitive data in your submission. This includes media (including screenshots) containing any (potentially) illegal content, such as Child Sexual Abuse Material, Non-Consensual Intimate Images. These types of illegal content must not be shared with An Coimisiún under any circumstances, including via screenshots. Please note that the Pilot Programme is not a complaints scheme. Submissions that are considered complaints under the DSA will be redirected to the appropriate process. An Coimisiún will contact you should it appear that your submission may be a complaint under the DSA.

**Funding:** Declare all sources of funding, both for the organisation as a whole and for the specific submission. An Coimisiún may request further details relating to funding sources where required.



**Submission timeframe requirement:** Submissions must be based solely on evidence collected from February 2024 onwards.

### **Examples of suitable submissions**

**Some examples of suitable submissions are listed below. The list is not exhaustive.**

- A report analysing trends in online hate speech affecting Irish youth, including anonymised statistics and a description of the research methodology.
- A survey of French parents highlighting concerns about harmful content on video-sharing platforms, with aggregated results and recommendations for improved controls.
- An anonymised summary from a frontline service identifying a rise in cyberbullying incidents among teenagers, with policy recommendations.

### **Examples of unsuitable submissions**

**Some examples of unsuitable submissions are listed below. The list is not exhaustive.**

- Individual complaints
- Lists of individual complaints containing personal data.
- Submissions that contain personal data or screenshots of illegal content.
- Anecdotal observations without supporting evidence or analysis.

### **5. My submission received funding from a third party, can I still submit it?**

Yes, however, you are asked to declare all sources of funding, both for the organisation as a whole and for the specific submission. This information is requested for transparency considerations.

### **6. How do I complete the Self Declaration and Submission Form?**

Download the Self Declaration and Submission Form from An Coimisiún's CSO [dedicated webpage](#), complete all sections, and submit it along with any supporting documents to the designated email address. An Coimisiún may follow up to request evidence to further understand or verify the content of your Self Declaration and Submission Form.

### **7. What happens after I submit?**

You will receive an acknowledgement of receipt within 72 hours. Your submission will be reviewed for eligibility and relevance and shared with the appropriate teams. You may be contacted for further information or clarification. An Coimisiún may hold information sessions for those who make submissions to provide high-level feedback related to information submitted to the Pilot and to collect feedback from CSOs.



## **8. Can a group of CSOs submit jointly?**

Yes, provided that a lead CSO is designated as the main point of contact and all participating CSOs must complete Part A of the Self Declaration and Submission Form.

## **9. How often can I submit information to the Pilot Programme?**

You can submit information to the Pilot Programme whenever you have insights that are relevant and useful. While there is no formal limit on how often you can submit, we expect that most CSOs are unlikely to prepare and share new material more frequently than every three months. This is a guideline only - not a rule. If you have information that is important or time-critical, you are welcome to share it at any point. As this is a pilot, we will keep the submission process under regular review and make adjustments where needed. This may include revisiting how frequently submissions are made if it supports smoother engagement.

If a new submission is made within 12 months from the date of the original submission, you will not be asked to complete the Self Declaration form again. You will, however, be asked to disclose whether any changes have occurred within your organisation in the intervening period, which may impact on the sources of funding or the eligibility criteria of the Pilot Programme.

## **10. What if my submission contains information that could be considered a complaint?**

This Pilot Programme is intended for existing and emerging systemic issues, supported by evidence arrived at through a robust methodology. It is not intended for individual complaints. Where it is considered that your submission appears to be a complaint under the DSA, An Coimisiún will contact you to discuss next steps.

## **11. What happens with the submission once it is received by An Coimisiún?**

When you submit information to the Pilot Programme, An Coimisiún will review your submission to assess its relevance, quality, and potential to inform online safety policy, supervision, or regulatory areas. Submissions may be used in a variety of ways, such as:

- Informing policy development: your evidence and insights may help shape future regulatory approaches, guidance, or strategic priorities.
- Supporting supervision and investigations: Submissions may contribute to the understanding of systemic issues, and, as appropriate, may be considered in supervisory activities or investigations.
- Identifying emerging issues: Your submission may highlight new or previously unidentified risks, helping An Coimisiún to respond proactively.

An Coimisiún may share submissions and/or information contained in submissions voluntarily with third parties, such as the European Commission and other Digital Services Coordinators. In this case, the relevant CSO will be consulted prior to the information being shared. An Coimisiún may also share information contained in submissions and/or submissions by operation of law including under data protection and/or freedom of information legislation. Further information in this respect is set out in section 7 above.

An Coimisiún does not commit to taking specific actions on foot of any individual submission received during the Pilot Programme. The impact and use of each submission will depend on its content, relevance, and the context in which it is received. In addition, An Coimisiún may not be in a position to disclose to you how your submission was used. An Coimisiún is committed to transparency, wherever possible, but must also protect the integrity of its processes and comply with legal obligations. Your submission is valued and may play an important role in shaping online safety regulation. While An Coimisiún will use submissions to inform its work, it cannot guarantee or disclose specific outcomes for every submission.

## 12. Why should my organisation participate in the CSO Pilot Programme?

Participating in the CSO Pilot Programme offers your organisation a unique opportunity to help shape the future of online safety regulation in Ireland and the wider EU. By making a submission, you can:

- **Inform policy and regulation:** Your insights and evidence can directly inform An Coimisiún's understanding of existing and emerging systemic issues, and the real-world impact of online platforms. This is your chance to ensure that the voices and experiences of your community are reflected in future regulatory decisions.
- **Highlight systemic issues:** The Pilot Programme is designed to identify patterns and trends that may not be visible through individual complaints. By sharing your organisation's research or observations, you help build a clearer picture of the challenges facing users—especially those who are vulnerable or underrepresented.
- **Demonstrate impact:** Submitting to the Pilot Programme allows your organisation to showcase its expertise, research, and advocacy work. This can strengthen your credibility with stakeholders, funders, and the public, and demonstrate your commitment to improving online safety.
- **Shape future engagement:** Feedback and lessons learned from the Pilot may inform the design of future statutory schemes and engagement mechanisms. Early participation means your organisation's needs and perspectives are more likely to be considered in the long term.

## 13. If my organisation participates in the Pilot Programme, will our involvement or submission be made public?

Submissions received during the Pilot Programme will not be published by An Coimisiún.

However, An Coimisiún may be obliged to share submissions and/or information contained in submissions with third parties by operation of law including under data protection and/or freedom of information legislation. Further information in this respect is set out in section 7 above.

In addition, An Coimisiún may share submissions and/or information contained in submissions voluntarily with third parties, such as the European Commission and other Digital Services Coordinators. In this case, the relevant CSO will be consulted prior to the information being shared.

Please note that An Coimisiún may acknowledge or recognise that your organisation has participated in the Pilot Programme, for example in general communications or summary reports about the Pilot Programme's progress.

## 14. Who falls within the scope of An Coimisiún's Online Safety Framework?

The Online Safety Framework applies to a broad range of digital and online service providers. A high-level description of these providers and their services is outlined below.

### Intermediary Service Providers (ISPs) – Category Definitions

#### Mere conduit service

Consisting of the transmission in a communication network of information provided by a recipient of the service, or the provision of access to a communication network.

Examples: internet service providers; direct messaging services; virtual private networks; domain name systems; voice over IP; top level domain name registries.

#### Caching service

Consisting of the transmission in a communication network of information provided by a recipient of the service, involving the automatic, intermediate, and temporary storage of that information, performed for the sole purpose of making onward transmission more efficient to other recipients upon their request.

Examples: content delivery networks; content adaptation proxies or reverse proxies.

#### Hosting service

Consisting of the storage of information provided by, and at the request of, a recipient of the service.

Examples: cloud service providers; online marketplaces; social media; app stores; travel and accommodation platforms.

### Types of Intermediary Service Providers

#### Intermediary Service Providers

Relates to organisations which provide services which consist of either a 'mere conduit' service, a 'caching' service, or a 'hosting' service. Categories 2-4 are subsets of this Category 1.

#### Hosting Service Providers

Hosting services are intermediary service providers who store information provided by, and at the request of, a recipient of the service.

#### Online Platforms

'Online Platforms' are hosting services that, at the request of a recipient of the service, stores and disseminates information to the public, unless that activity is a minor and purely ancillary feature of another service or a minor functionality of the principal service and, for objective and technical reasons, cannot be used without that other service, and the integration of the feature or functionality into the other service is not a means to circumvent the applicability of the DSA.

#### Very Large Online Platforms and Very Large Online Search Engines

Very Large Online Platforms (VLOPs): VLOPs are online platforms having 45 million or more average monthly active recipients of the service in the EU (representing approximately 10% of the population of the EU).

Very Large Online Search Engines (VLOSEs): VLOSEs are search engines having 45 million or more average monthly active recipients of the service in the EU (representing approximately 10% of the population of the EU).

#### **15. What will happen after the Pilot Programme ends?**

At the conclusion of the Pilot Programme, An Coimisiún will undertake a formal evaluation to assess its overall utility for both An Coimisiún and participating CSOs. This evaluation will examine what worked well, identify areas for improvement and inform the most appropriate next steps, including whether and how a future statutory scheme or ongoing process should be developed.