



D4.3: Awareness raising package for micro and small HSPs

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Executive Summary

This Awareness Raising Package provides an overview of the tools and resources developed by the FRISCO project for Hosting Service Providers (HSPs) to enable them to better understand their regulatory obligations under the European TCO Regulation (*Regulation (EU) 2021/784 of the European Parliament and of the Council of 29 April 2021 on addressing the dissemination of terrorist content online*) and implement effective measures to respond to terrorist content. These tools address different aspects of HSPs' responses to terrorist content online and offer practical information and resources that can aid compliance efforts. The package consists of two videos and four fact sheets.

Video material

Two videos for HSPs with a total length of 7 minutes to make them aware of the TCO Regulation, their responsibilities resulting from it, and to encourage them to proactively engage with FRISCO resources.

- Video 1: informing HSPs about the TCO Regulation and its main provisions through fictitious relatable case studies. Raising their awareness of FRISCO support offering and encouraging engagement with it.
- Video 2: informing HSPs of concrete obligations and measures to undertake to comply with the TCO Regulation and protect themselves against terrorist content. Raising their awareness of FRISCO resources and encouraging engagement with these.
- A social media teaser based on the content from both videos

The structure of the fact sheets is as follows:

Fact Sheet #1: The TCO Regulation at a glance: what HSPs need to know

- The fact sheet provides a quick guide for HSPs on the key provisions and scope of the Regulation and outlines the main obligations of HSPs.

Fact Sheet #2: Navigating compliance with the TCO Regulation: a starter kit for HSPs

- FRISCO Self-assessment questionnaire
- FRISCO Process map

Fact Sheet #3: Navigating content moderation: solutions for HSPs

- FRISCO Content moderation tool
- FRISCO Brochure on technical tools and approaches to address TCO

Fact Sheet #4: Staying one step ahead in countering terrorist content online: training and good practices for HSPs

- FRISCO Training Modules
- FRISCO Best Practice Manual

This deliverable demonstrates how HSPs can use and benefit from the FRISCO resources to boost their trust & safety mechanisms in addressing terrorist content on their services proactively and fulfil their legal obligations under the TCO Regulation.

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List of Terms & Abbreviations

Abbreviation	Definition
EU	European Union
FRISCO	Fighting Terrorist Content Online project
HSP	Hosting service provider
TCO	Terrorist content online
TCO Regulation	Regulation (EU) 2021/784 of the European Parliament and of the Council of 29 April 2021 on addressing the dissemination of terrorist content online
WP	Work Package

1 Introduction

The deliverable **D4.3 Awareness raising package for small and micro HSPs** is produced within WP4 *Sharing of experiences, developing best practices and awareness raising* of the FRISCO project. This deliverable consists of two videos with a total length of 7 minutes, aimed at raising awareness about terrorist content online, the TCO Regulation and roles and responsibilities of HSPs, as well as four fact sheets highlighting different aspects and key findings of the FRISCO project for broader public dissemination, including at the final conference.

The primary target group of this deliverable are small and micro HSPs. Our mapping report has shown that these have limited awareness of their exposure to terrorist content and their obligations under the TCO Regulation. They further lack the tools and formal processes to comply with EU regulations and require both legal information and technical support.

The FRISCO tools and resources highlighted through this deliverable meet these needs by offering practical, actionable advice and accessible tools to help HSPs: 1) assess their level of compliance and gaps; 2) understand and navigate the compliance process step-by-step; 3) deepen their understanding on how to address terrorist content online through trainings; 4) optimize and streamline content moderation workflows; 5) receive practical guidelines and learn from good practices and case studies; 6) get informed about technical tools and solutions available to address illegal content.

This deliverable is based on the work done in WP2, WP3 and WP4. It demonstrates how HSPs can use and benefit from the FRISCO resources to boost their trust & safety mechanisms in addressing terrorist content on their services proactively and fulfil their legal obligations under the TCO Regulation.

AWARENESS RAISING VIDEOS

Two videos for HSPs with a total length of 7 minutes to become aware of the TCO Regulation and proactively engage with the FRISCO resources.

- Video 1: informing HSPs on the TCO Regulation and its main provisions through specific relatable case studies. Raising their awareness of the FRISCO support offering and encouraging engagement with it.
- Video 2: informing HSPs of concrete obligations and measures to undertake to comply with the TCO Regulation and protect themselves against terrorist content. Raising their awareness of the FRISCO resources and encouraging engagement with these.
- A social media teaser based on the two videos

FACT SHEETS

The fact sheets aim to further raise awareness of HSPs by presenting in a concise format the main tools and resources developed by the FRISCO project along themes relevant for HSPs, such as understanding the key provisions of the TCO regulation, implementing content moderation approaches and enhancing their internal knowledge and capacities through trainings and good practices.

The FRISCO Fact Sheets are structured as follows:

Fact Sheet #1: The TCO Regulation at a Glance: what HSPs need to know

The fact sheet provides a quick guide for HSPs on the key provisions and scope of the Regulation and outlines the main obligations of HSPs.

Fact Sheet #2: Navigating compliance with the TCO Regulation: a starter kit for HSPs

- FRISCO Self-assessment questionnaire
- FRISCO Process map

Fact Sheet #3: Navigating content moderation: solutions for HSPs

- FRISCO Content moderation tool
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Fact Sheet #4: Staying one step ahead in countering terrorist content online: training and good practices for HSPs

- FRISCO Best Practice Manual
- FRISCO Training Platform

Each fact sheet will be disseminated as a separate document, through the project's website and social media channels and in print during the FRISCO final conference.

2 FRISCO Awareness Raising Videos

To make HSPs aware of their obligations arising from the TCO regulation, 7min of informative and engaging English-language video content was produced by an external communications agency for the FRISCO project, with subtitles in German and French.

To keep the audience's attention, the content was split into two autonomous yet connected videos with a total length of 7min, plus a short teaser for social media. The videos promote a call to action towards HSPs and relevant industry associations to get informed about their obligations (including through proactive engagement with the FRISCO produced resources) under the regulation and take measures as needed. The videos provide information on the TCO regulation itself, as well as guidance for HSPs on obligations, roles, and responsibilities, including ways to get support in removing the barriers to proactive compliance with the TCO regulation.

Building upon various project resources, the videos serve as an entry point for HSPs and relevant industry associations who may be dealing with this topic for the first time and are seeking solutions, to drive them towards engagement with the resources available in the FRISCO project.

Video 1 – Awareness

The first video highlights the various forms of terrorist content and the responsibilities hosting services must adopt to combat it under the European Union's TCO Regulation. It uses examples of

companies like the fictitious hosting service Let'sTalk and the file storage service MyVideo to illustrate how hosting services can comply with these rules. While Let'sTalk, a small forum, utilises community-based content moderation due to limited resources, MyVideo has a more established system, already experienced in removing other illegal content like child sexual abuse material. Both companies are required to set up a point of contact and develop guidelines to restrict terrorist content. With support from the EU-funded FRISCO project, these companies are encouraged to adopt best practices and a holistic trust and safety approach to secure their platforms against terrorist exploitation.

Link to video 1: [FRISCO: Fighting Terrorist Content Online - Awareness \(youtube.com\)](#)

Video 2 – Tools and Measures

The second video emphasises the importance of hosting service providers, such as the fictitious MyVideo file storage service, implementing strong protective measures against terrorist content to avoid serious business consequences such as reputational damage, legal liability, and fines. It illustrates a scenario where MyVideo receives a removal order for hosting terrorist content, and highlights the swift action required to comply with EU regulations, including removing the content within one hour, and notifying users. The video stresses that proactive measures, supported by resources like the FRISCO project, are crucial for preventing future incidents and minimising risks.

Link to video 2: [FRISCO: Fighting Terrorist Content Online - Tools and Measures \(youtube.com\)](#)

The videos will be available on the project website and disseminated via the project's social media accounts, as well as all project partners via their respective social media accounts, in a concerted effort. The videos will also be shown at the FRISCO final conference, encouraging participants to share the videos within their networks.

3 FRISCO Fact Sheet #1: The TCO Regulation at a Glance - What Hosting Service Providers need to know

This Fact Sheet is part of the FRISCO project's comprehensive offering of tools and resources supporting Hosting Service Providers (HSPs) to develop effective responses to addressing the dissemination of terrorist content online. It provides a concise overview of the key provisions of the EU's **TCO Regulation**¹ and how online platforms are affected. The fact sheet addresses the following questions:

- What are the key elements of the TCO Regulation?
- What is its scope of applications and who is affected?
- What is terrorist content?
- What are the main obligations of HSPs?



Removal orders: National competent authorities in each Member State have the power to **issue removal orders** requiring hosting service providers to remove or disable access to terrorist content across all Member States. HSPs need to establish a single point of contact or a legal representative (for non-EU companies) to receive removal orders and cooperate with authorities.



One-hour rule: Online platforms are obliged to **remove or disable access to terrorist content within one hour** upon receiving a removal order from Member States' competent authorities; inform users of the removal and the reasons therein and preserve the content removed or disabled.



Proactivity: Online platforms are obliged to take **specific proactive measures** to identify and prevent the dissemination of terrorist content **if they have been exposed** to such (e.g. implement content moderation mechanisms). Measures need to be appropriate, effective and proportionate.



Protection of fundamental rights: Strong safeguards need to be in place to protect fundamental rights, such as freedom of expression and information, respect for private life and personal data protection. For example, **user-friendly and effective complaint procedures** must be implemented for erroneous removal of lawful content, human oversight and verification of content moderation, among others.



Sanctions: EU Member States are able to **sanction non-compliance** and to decide on the level of penalties (up to 4% of annual turnover), which will be proportionate to the nature of the infringement and the size of the hosting service.

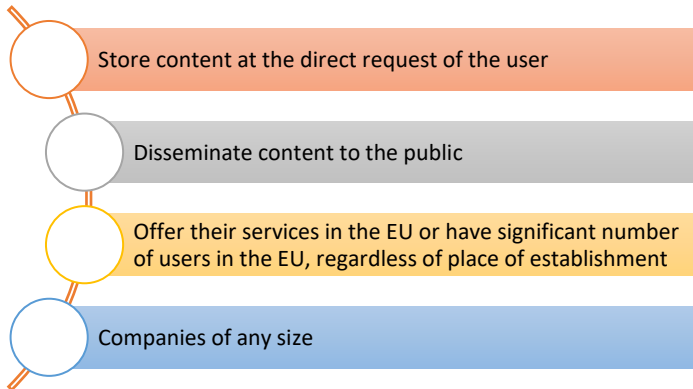


Transparency requirements: Online platforms that have been exposed to or have taken actions against terrorist content, and national authorities, have **reporting and transparency obligations**. This includes annual reports on the removal of terrorist content, the outcomes of complaints and appeals, and for national authorities – information on the penalties imposed on online platforms.

¹ Regulation (EU) 2021/784 of the European Parliament and of the Council of 29 April 2021 on addressing the dissemination of terrorist content online. <https://eur-lex.europa.eu/eli/reg/2021/784/oj>.

Who is affected? Definition of Hosting Service Providers (HSPs)

The TCO Regulation applies to Hosting Service Providers, who fulfil the following criteria:



Hosting Service Provider: a provider of Information Society services, consisting of the storage of information provided by and at the request of a content provider.

Information Society service: any service normally provided for remuneration, at a distance, by electronic means and at the individual request of a recipient of services.

Terrorist content as any type of material

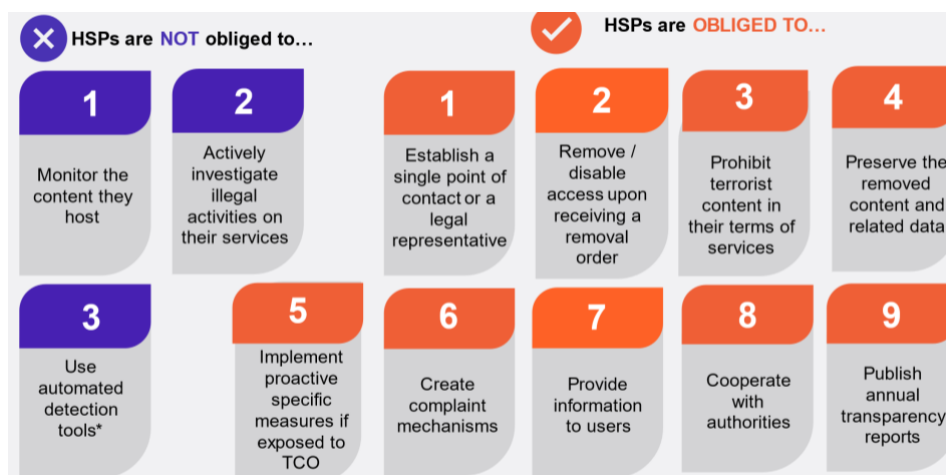
What is terrorist content?

(including **text, audio, video**) that:

- incites terrorist offences² or glorifies terrorist acts,
- provides instructions for making weapons or using them for terrorist purposes,
- or promotes terrorist groups or solicit participation therein.

Excluded content: To ensure a balance between protecting public safety and freedom of expression, the regulation excludes content used for education, journalism, artistic expression, research, or raising awareness against terrorism.

What are the implications for HSPs?



* The EU TCO Regulation (Art. 5) requires HSPs who have been exposed to terrorist content to put in place specific proactive measures to identify and prevent the dissemination of terrorist content. HSPs can choose what content moderation measures are effective and proportionate to the risks and their own capabilities and resources.

² At the EU level, there is no definition of terrorism per se; terrorist attacks and offences are defined by the EU Directive 2017/541, Art. 3.

4 FRISCO FACT SHEET #2: Navigating Compliance with the TCO Regulation - A starter kit for Hosting Service Providers

This Fact Sheet is part of the FRISCO project's comprehensive offering of tools and resources supporting Hosting Service Providers (HSPs) to develop effective responses to terrorist content online and fulfil their obligations under the EU's **TCO Regulation**³.



The majority of small and micro HSPs are **not sufficiently aware** of the Regulation and how it affects them. They further **lack the tools and processes** to comply with it and require legal and technical support.



The **FRISCO Self- Assessment Questionnaire** and the **FRISCO Process Map** come to the rescue. These tools offer a **starter kit** for small and medium HSPs to understand legal and operational obligations, determine their compliance status and next steps and learn how to manage the

FRISCO Self-Assessment Questionnaire

compliance process.

The FRISCO Self-Assessment Questionnaire is a first step in evaluating compliance with the TCO Regulation and identifying gaps and next steps for HSPs. It helps them assess whether they fall under the scope of the TCO Regulation and what actions they should undertake to address operational gaps.

<p>Goal</p>	<p>What is it?</p>	<p>How does it work?</p>
<p>Intended to assist HSPs in evaluating their compliance with the TCO Regulation.</p>	<p>An online questionnaire that serves as an initial step for HSPs to assess alignment of their content moderation processes with TCO requirements.</p>	<p>Guides HSPs through 34 questions in thematic sections related to all aspects of the TCO Regulation and its requirements. Provides HSPs with a compliance score to help them situate themselves in the path to full TCO compliance.</p>

Link: <https://friscoproject.eu/frisco-questionnaire/>




For a better experience, visit the dedicated version of the tool: apps.friscoproject.eu

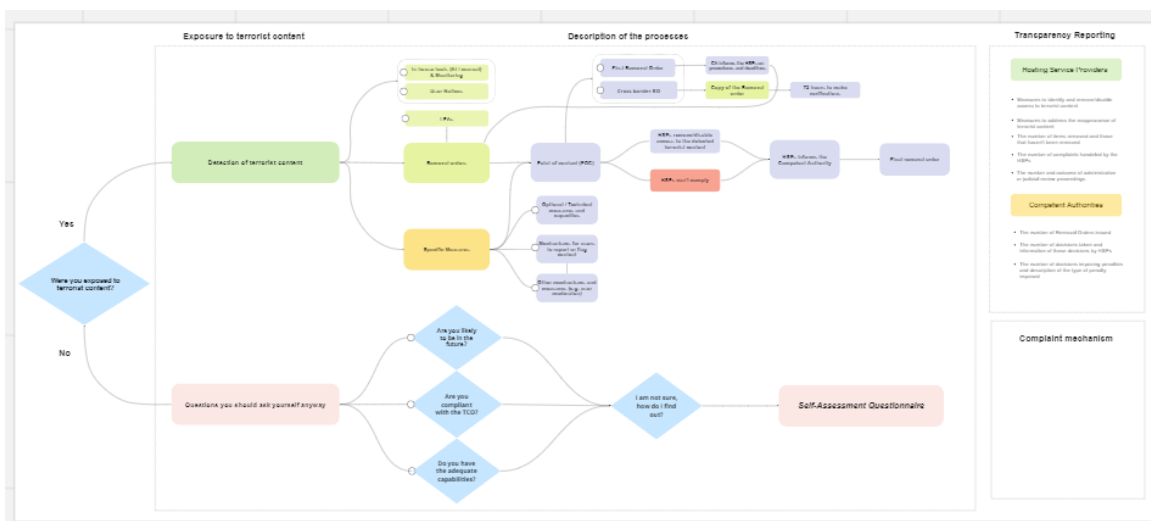


³ Regulation (EU) 2021/784 of the European Parliament and of the Council of 29 April 2021 on addressing the dissemination of terrorist content online. <https://eur-lex.europa.eu/eli/reg/2021/784/oj>.

FRISCO Process Map

The FRISCO Process Map is an interactive compliance workflow that breaks down the TCO Regulation and its requirements and leads HSPs through the different processes triggered by a removal order or exposure to terrorist content.

 <p>Goal</p>	 <p>What is it?</p>	 <p>How does it work?</p>
<p>The goal of the process map is to assist HSPs in understanding and navigating compliance with the TCO Regulation.</p> <p>It aims to provide a step-by-step overview of the entire compliance process and clarify key terms and required steps.</p>	<p>An interactive process map that structures and describes the compliance steps with the TCO Regulation and related duties for HSPs in a holistic way focusing on their operational needs and measures that need to be undertaken for each scenario (i.e. from the exposure to terrorist content, through dealing with removal orders, to transparency reports).</p>	<p>It provides a precise breakdown of the TCO Regulation following a chronological approach to compliance.</p> <p>The process is displayed gradually, thanks to interactive and/or animated transitions, and the whole map can be downloaded in the end.</p> <p>Free access.</p>



Link: <https://friscoproject.eu/frisco-toolbox/>
 For a better experience, visit the dedicated version of the tool here:
apps.frisco-project.eu/flowchart



5 FRISCO FACT SHEET #3 – Navigating Content Moderation - Solutions for Hosting Service Providers

This Fact Sheet is part of the FRISCO project’s comprehensive offering of tools and resources supporting Hosting Service Providers (HSPs) to develop effective responses to terrorist content online and fulfil their obligations under the **EU’s TCO Regulation**.⁴ This Fact Sheet focuses on **content moderation** and why it matters for HSPs. The **FRISCO Content Moderation Tool** and the **FRISCO Brochure on technical solutions** presented here aim to support online platforms in choosing the most appropriate and effective content moderation approach and set them up for success.

Why is content moderation important?

Content moderation is a **first line of defence** against terrorist content, as it involves preventing harmful content from spreading online and disabling it once it is shared publicly to reduce its reach.

- it entails **the review of user-generated content** to ensure it complies with community guidelines, terms of services, and legal regulations (such as the TCO Regulation).
- it can result in the **removal or restriction of content** flagged as harmful, malicious or abusive by a moderator.
- it can employ a **combination of automated algorithms and human oversight**.
- it requires a **careful balance** between preserving free speech and fostering a safe digital space.



The **EU TCO Regulation** (Art. 5) requires HSPs who have been exposed to terrorist content to put in place **specific proactive measures** to identify and prevent the dissemination of terrorist content. Content moderation is therefore an essential defensive and preventive mechanism.

Proactive models



- Pre-moderation:** content reviewed before publishing
- Automatic filtering,** keyword filtering in real time
- AI and machine learning-based** algorithms, image and video recognition

Reactive models



- Post-moderation:** content reviewed after publishing
- Community moderation** and user reporting
- Appeals and dispute resolution**

Content moderation might require significant **technical and human resources** that smaller companies do not have. It is important to know that there are many different content moderation styles. While the TCO Regulation does not prescribe a specific approach, many **HSPs use a combination** of automated moderation alongside user reporting, trusted flagger programs, and industry collaboration efforts.

⁴ Regulation (EU) 2021/784 of the European Parliament and of the Council of 29 April 2021 on addressing the dissemination of terrorist content online. <https://eur-lex.europa.eu/eli/reg/2021/784/oj>.

FRISCO Content Moderation Tool



Goal

Optimise and streamline content moderation workflows and processes for HSPs in compliance with the TCO Regulation.

Intended for HSPs without in-house technical solutions for managing content moderation.



What is it?

It is a user-friendly trust and safety **content moderation tool** that addresses user-generated content related risks, including terrorist content.



How does it work?

The tool is based on **Tremau's in-house solutions** and tailored to HSPs' needs in relation to the TCO, thanks to the project's findings and resources. This tool is only usable through an **integration with the HSP's system** and provided through a SaaS (Software as a Service) contract with Tremau.

This tool provides a content moderation platform in which incoming flags from different sources of reporting of violative content are aggregated. Moderators can subsequently view the reported cases and make related decisions (i.e, keep or remove content, signal user) based on platform policies. It further allows HSPs to:

- set up an appeal mechanism
- devise a policy configuration and enforcement strategy
- send to users a statement of reasons for removed content, via an automated workflow
- integrate requests/removal orders from law enforcement
- generate transparency reports

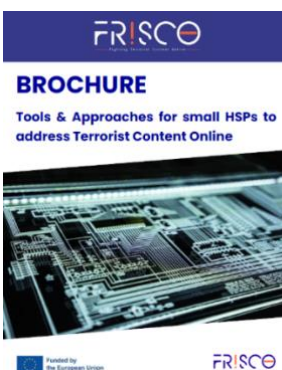


Link: <https://friscoproject.eu/content-moderation-tool/>

Contact FRISCO partner Tremau to receive information and test the tool.



FRISCO Brochure: Tools and approaches for small HSPs



The brochure is a collection of further technical tools and software solutions available to HSPs in the field of **detection and moderation of terrorist content**. It aims to familiarise them with the wide range of industry and open-source software applications available to address terrorist content and facilitate full compliance with the TCO Regulation, including:

- ◆ Content moderation software
- ◆ Tools for detection of harmful/illegal content
- ◆ Hash-matching tools



Access the brochure here:

<https://friscoproject.eu/publications/>



6 FRISCO FACT SHEET #4: Staying one step ahead in countering terrorist content - Training and Good Practices for Hosting Service Providers

This Fact Sheet is part of the FRISCO project's comprehensive offering of tools and resources supporting Hosting Service Providers (HSPs) to develop effective responses to terrorist content online and fulfil their obligations under the **EU's TCO Regulation**.⁵

It provides an overview of the **FRISCO Best Practice Guide** and the **FRISCO Training Platform**, tailored to HSPs' needs. These resources aim to boost the competency and preparedness of online platforms required to fulfil regulatory requirements and proactively shape their trust & safety practices to protect themselves against terrorist content.

FRISCO Manual: Best Practices Guide for HSPs



The FRISCO Manual offers actionable guidance, case studies and good practices to help HSPs fulfil their obligations under the TCO Regulation. It provides practical tips on *HOW* HSPs should fulfil their core obligations and shows examples of proactive approaches to identify and remove terrorist content online so that HSPs can protect their services and users, by:

- ◆ Drafting **terms of service** and **policy guidelines** prohibiting terrorist content and setting up user reporting mechanisms
- ◆ Designating a **point of contact** or a **legal representative** for the purposes of the TCO Regulation
- ◆ Responding to **removal orders** from national authorities and preserving removed or disabled access
- ◆ Notifying users and establishing a **complaint mechanism**
- ◆ Putting in place **specific measures** to detect and prevent the spread of terrorist content, such as content moderation
- ◆ Drafting **transparency reports**
- ◆ Making use of **industry partnership** and collaboration

The Manual contains checklists, FAQs and a wealth of linked resources and templates to help HSPs translate knowledge into action.

Read the FRISCO Best Practice Manual here:

<https://friscoproject.eu/publications/>



⁵ Regulation (EU) 2021/784 of the European Parliament and of the Council of 29 April 2021 on addressing the dissemination of terrorist content online. <https://eur-lex.europa.eu/eli/reg/2021/784/oj>.

FRISCO Training Platform



Goal

Support online platforms in their compliance and content moderation efforts through **tailored in-depth online training**.

Equip HSPs with **key competences** related to responding to terrorist content online, such as terrorist use of the internet, the TCO Regulation and its requirements, trust & safety policies and practical approaches to content moderation.

Provide a **holistic knowledge base** for HSPs to enable them to develop appropriate and effective measures



What is it?

An online training platform organised in 7 MODULES:

1. Content moderation in a Trust & Safety perspective
2. Terrorism and violent extremism online
3. Terrorist (mis)uses of the internet and online platforms: trends and practices
4. TCO Regulation: context & overview
5. TCO Regulation: measures and related duties for your company
6. TCO Regulation: impacts and road to compliance
7. Beyond TCO: how to stay a step ahead



How does it work?

Suitable for **HSPs, trust & safety teams** and other interested professionals
Free of charge, **online registration** required
Available in **7 languages** (EN, DE, FR, NL, HU, IT)
Consists of ad hoc learning materials, videos, links to external resources and quizzes
Self-paced learning
Badge of completion

Access the training platform here: <https://training-friscoproject.eu/>



About FRISCO

FRISCO ("Fighting Terrorist Content Online") is an EU-funded project implemented by a team of 7 partners across Europe. Our main objective is to raise awareness among small hosting service providers and online platforms and to help them comply with the EU Regulation on Addressing the Dissemination of Terrorist Content Online (TCO Regulation). By supporting the fight against terrorist content in Europe, we are helping to prevent and counter violent extremism online and to create a safer online environment.

Check out all resources for hosting services on our website: <https://friscoproject.eu>

Follow us on social media to receive latest news

LinkedIn <https://www.linkedin.com/company/frisco-eu-project/>



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