Online Content Moderation Project (PrOCoM)

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“You see things;
you say 'Why?'.
But I dream things that never were;
and I say 'Why not?'.”

George Bernard Shaw
Colophon

Data sender

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Project name
Online Content Moderation (PrOCoM)

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Index

Colophon 3

1 Project definition 7
   1.1 Background and the societal issues 7
   1.2 Objectives 8
   1.2.1 Ideal objective 8
   1.2.2 Operational objectives 8
   1.3 Target groups 9
   1.4 Results 9
   1.4.1 Results for objective 1 9
   1.4.2 Results for objective 2 9
   1.4.3 Results for objective 3A 10
   1.4.3.1.1 Sub-results for objective 3A.a 10
   1.4.3.1.2 Sub-results for objective 3A.b 10
   1.4.3.1.3 Sub-results for objective 3A.c 10
   1.4.3.1.4 Sub-results for objective 3A.d 11
   1.4.4 Results for objective 3B 11
   1.4.4.1 Sub-results for objective 3B 11
   1.4.5 Results for objective 4 11
   1.4.5.1 Sub-results for objective 4f 11
   1.5 Elaboration of objectives and results 11
   1.6 Effects 12
   1.7 Prerequisites 12
   1.8 Scope 13
   1.9 Context 13

2 Project approach and phasing 15
   2.1 Approach 15
   2.2 Phasing and planning 15
   2.3 Financial matters 15
   2.4 Communication 15
   2.4.1 Internal communication 15
   2.4.2 Stakeholder communication 16
   2.4.3 Public communication 16

3 Project organisation 17
   3.1 Organisational chart 17
   3.2 Roles and responsibilities 17

4 Project management and control 19
   4.1 Project management 19
   4.2 Embedding the project 19
1 Project definition

1.1 Background and the societal issues

The online world is developing rapidly. New technologies and user-friendly operating systems make computers and other devices increasingly easy to operate and therefore more accessible to a wider public. The vast majority of people living in the Netherlands is connected to the internet and use social media. Online applications help people perform actions previously limited to professional computer programmers. Through the internet, there are easily accessible technical ways to publish, share or store data. The government has deliberately chosen not to hinder these online developments through laws and regulations.

This restrained stance of the government can be traced to the political view that freedom of expression should be protected and that the image of a government placing limits on the public discourse is not compatible with that aim, combined with the view that standard-setting, regulation and enforcement should be left to market participants wherever possible. Both views are now subject to increasing pressure, resulting in a growing call from the public and politicians for a re-evaluation of this policy of restraint. The Digital Services Act (DSA), the new European legal framework in which responsibilities with regard to illegal online content have been formalised, therefore goes much further in many areas than the e-Commerce Directive when it comes to regulating the internet sector.

The right to freedom of expression is not unlimited. The government may set limits on the freedom of expression, provided these limits have a legal (and therefore democratically legitimate) basis and are proportional and subordinate. When the government maintains an impartial stance with regard to enforcing standards and regulating the societal discourse on the internet, a situation may arise in which the internet sector – as the facilitator of that debate – de facto determines what may and may not be said. In addition, while self-regulation is for the most part successful, there are still a small number of market parties who avoid taking responsibility and/or feign ignorance, and against whom the industry itself can take no enforcing measures. This is an undesirable situation. On the other hand, it would also be undesirable for the government to ‘take over’ the internet and control it completely. The Dutch hybrid public-private approach to combating online sexual abuse of children, based on freedom of expression and content moderation by parties operating independently of the government itself, seems to be a successful formula for broader application to all forms of online content that require standardisation, regulation, monitoring and enforcement.

Due to the lack of explicit norms online and their enforcement, malicious people are hardly prevented from distributing punishable, harmful or otherwise socially undesirable material. In addition, many well-intentioned parties are unaware that what they entrust to the internet is punishable, can lead to damage or other undesirable effects for others or themselves, or can even disrupt public order, radicalise people, or undermine democratic institutions.

This yields a risk that the standards for online conduct will be perceived to be different than those for offline behaviour, and that rules that apply offline will be insufficient for managing online phenomena. In the long term, this may have a detrimental effect on the legal certainty, the legal equality and fundamental rights. People are pitted against one another and may, knowingly or unknowingly, be
exposed to and potentially victimised by criminal or unlawful material. Citizens feel powerless: they no longer know how to judge the tidal wave of information washing over them; or what their rights and duties are online; or where to turn for help, support or compensation for harm. They feel abandoned by government agencies that fail to intervene. Existing possibilities for support and obtaining justice in the offline world seem, for the most part, unsuitable in relation to the online material: the amount of criminal and unlawful material on the internet is far too great to simply refer victims to the criminal justice system and civil courts. In short: something must be done.

1.2 Objectives

1.2.1 Ideal objective

The Online Content Moderation Project (PrOCoM) aims to help resolve the problem described above by means of the following contribution:

**Ideal objective**

PrOCoM aims to provide a public-private framework within which citizens, the government and the internet sector can actively and effectively deal with online material that is criminal, inflicts harm or causes socially undesirable effects. To this end, a basic infrastructure will be developed for handling removal requests and orders with a criminal, civil or administrative legal basis. This will include making it easy and accessible for citizens to easily report online material that harms them. In addition, we will develop instruments that will help the government and the internet sector to be able to act when necessary and provide them with knowledge and a legal framework to intervene online in a socially acceptable manner. Finally, we will establish a public-private approach that can be highlighted internationally and in Europe as good practice.

In order to achieve the ideal objective, the following operational objectives have been formulated:

1.2.2 Operational objectives

1 – To establish a structure for public-private partnerships with regard to online content moderation.

2 – To develop a user-friendly facility for citizens to report unlawful online content.

3A – Having instruments available for local administrators for the purpose of preventing and/or mitigating public-order problems driven by online behaviour.

3B – To issue a recommendation regarding a facility for blocking access to online content at the request of the local government.

4 – To build and sustainably maintain knowledge and expertise on the workings of the internet, online phenomena and content moderation.
1.3 **Target groups**

The target groups recognised are:

<table>
<thead>
<tr>
<th>Target group for objective 1:</th>
<th>The internet sector and the Dutch government</th>
</tr>
</thead>
<tbody>
<tr>
<td>Target group for objective 2:</td>
<td>The internet sector and citizens harmed by online content</td>
</tr>
<tr>
<td>Target group for objective 3A:</td>
<td>Local administrators, municipal officials, police and the Public Prosecution Service</td>
</tr>
<tr>
<td>Target group for objective 3B:</td>
<td>Local administrators and municipal officials</td>
</tr>
<tr>
<td>Target group for objective 4:</td>
<td>Academics, administrators, lawyers and civil servants whose work deals with online content</td>
</tr>
</tbody>
</table>

1.4 **Results**

In order to attain the objectives outlined above, the following results need to be achieved:

1.4.1 **Results for objective 1**

**Objective 1: To establish a structure for public-private partnerships with regard to online content moderation.**

a. The establishment of a three-tier model for public-private cooperation (sounding board, working groups, core team).

b. A co-created *Memorandum of Understanding (MoU)* between the internet sector and government regarding general principles in issuing and following up on removal orders and requests.

c. An *Abuse Reporting Tool (ART)* for the registration and monitoring of removal requests.

d. A mechanism for organising and monitoring related to the agreements in the MoU.

e. Input to the process of bringing the *Notice Take Down (NTD)/ Notice Take Action (NTA)* agreements in line with recent legislation, including at any rate the *Digital Services Act (DSA)*.

f. Embed the public-private partnership to ensure a future-proof cooperation.

1.4.2 **Results for objective 2**

**Objective 2: To develop a user-friendly facility for citizens to report unlawful online content.**

a. Build a business case for the establishment of government-subsidised contact points/hotlines.

b. An assessment framework for unlawful content.

c. Design a user-friendly facility for reporting specific kinds of unlawful content.
1.4.3 Results for objective 3A

Objective 3A: To ensure sets of instruments are available to local administrators for the purpose of preventing and/or mitigating public-order problems driven by online behaviour.

a. An up-to-date handbook (or up-to-date website) that maps out the instruments that can be used to address the various categories of online material.

b. An integral decision-making framework for the government's role with respect to online material.

c. A virtual assistant for 'personalised advice' and user evaluation for policy-making purposes.

d. A barrier model¹ for the benefit of the Public Prosecution Service and police when dealing with online content.

e. Facilitating municipalities in taking local cases to court that contribute to creating case law regarding online content moderation.

1.4.3.1.1 Sub-results for objective 3A.a

i. Escalation models for the various forms of online material.

ii. A decision-making framework for criminal, unlawful and undesirable online material.

iii. Components of the decision-making framework are included in the toolbox for the criminal justice system and are available for consultation online.

1.4.3.1.2 Sub-results for objective 3A.b

i. A digital advisory tool in connection with online phenomena².

ii. A supporting web file.

iii. A user evaluation for policy-making purposes.

1.4.3.1.3 Sub-results for objective 3A.c

i. A comprehensive Excel file on the barriermodellen.nl website.

ii. A clickable PDF to make the Excel file readable and expand its applicability.

iii. A meeting with the Ministry of Justice and Security, local administrators, the Public Prosecution Service and the police, at which the model is presented.

¹ The barrier model will be elaborated by the Centre for Crime Prevention and Safety (CCV). Existing barrier models are available for reference at the website www.barriermodellen.nl. It is possible to develop a barrier model from different perspectives: i.e., from the perspective of the criminal or from the perspective of the victim. This entails a step-by-step description of the entire process the criminal or victim will go through. At the start of each modelling process, experts from various government agencies, the business community and academics will determine the perspective from which the barrier model will be designed. The initiative for creating a barrier model often emerges when an organisation (such as the police and Public Prosecution Service) realises that a given offence must be addressed in cooperation with other partners. This may be because investigation alone is insufficient or is not the proper way to prevent, halt or judicially manage the problem. A barrier model is an effective policy instrument that offers insight and oversight to professionals, helping them determine which organisation at which point in time is most likely to succeed in thwarting criminals or helping victims, depending on the phase in which a victim or offender finds themselves in the process (as set out in the barrier model).

1.4.3.1.4 Sub-results for objective 3A.d
   i. A legal working group at the local level.
   ii. An inventory of needs regarding laws and regulations for online content moderation at the local level.
   iii. The publication of an overview of cases.

1.4.4 Results for objective 3B

Objective 3B: To issue a recommendation regarding a facility for blocking access to online content at the request of the local government.

A recommendation on setting up a reporting facility for local administrators.

1.4.4.1 Sub-results for objective 3B
   i. An exploratory study of needs and support among municipalities.
   ii. A study of design principles.
   iii. A final report concerning the usefulness and necessity of a contact point/hotline for reporting online content that threatens the public order, including a cost-benefit analysis.

1.4.5 Results for objective 4

Objective 4: To build and sustainably maintain knowledge and expertise on the workings of the internet, online phenomena and content moderation.

a. A permanent knowledge network of experts on the functioning of the internet, online phenomena and content moderation.

b. A periodic report on developments in online phenomena and recommendations on topics related to online content that require particular attention.

c. A permanently maintained and functioning Interdepartmental Knowledge Agenda for Online Content Moderation.

d. A permanently maintained overview of legal issues with regard to online content moderation.

e. An organisation that continuously delivers instruments and facilitates the exchange between decentral governments in relation to the moderation of undesirable online material.

f. Online content has been included as a distinct and overarching category in the Dutch Research Agenda (NWA).

1.4.5.1 Sub-results for objective 4f
   i. Implementation and dissemination of the interim results from the NWA project.
   ii. An established process that ensures that the final results of the research are utilised and disseminated.

1.5 Elaboration of objectives and results

The elaboration of the major points of the stated objectives will take the form of a subproject plan for each line of action. These will be furtherly and definitively elaborated after this project plan has been approved by the Steering Committee. In

3 The term ‘undesirable’ is intended broadly here and therefore also includes content that can be classified as ‘illegal’ (and therefore unlawful and criminal).
addition, at the end of the project, safeguarding agreements will be laid down for each of the stated goals and the project results will be handed over to the parties who are tasked with further implementing the results once the project has ended.

1.6 **Effects**

The realisation of the project objectives is intended to have the following effects:

<table>
<thead>
<tr>
<th>Effects</th>
<th>Project objectives</th>
</tr>
</thead>
<tbody>
<tr>
<td>Unambiguous terminology and the same classification is used within the government with regard to online content.</td>
<td>1     2     3A  3B   4</td>
</tr>
<tr>
<td>Policymakers and officials at municipalities and ministries who deal with online phenomena or certain forms of online content are sufficiently knowledgeable and know how to act.</td>
<td></td>
</tr>
<tr>
<td>There is clarity as to the role of the government and the internet sector regarding online content moderation and its implementation in practice. The government shows itself to be a reliable and predictable partner for the sector.</td>
<td></td>
</tr>
<tr>
<td>A perspective is available for citizens to be able to have online content that harms them removed.</td>
<td></td>
</tr>
<tr>
<td>The quality and effectiveness of moderation is increased thanks to a higher level of knowledge, the development of instruments and facilities, and clear agreements under the public-private partnership.</td>
<td></td>
</tr>
<tr>
<td>The legal certainty, the legal equality and the basic fundamental rights of persons are strengthened.</td>
<td></td>
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</tbody>
</table>

1.7 **Prerequisites**

The timely and high-quality implementation of the project requires:

- approval of the project plan from the Steering Committee;
- sufficient and high-quality project capacity;
- sufficient resources;
- sufficient time for coordination with the commissioning party (client);
- stakeholder participation and support;
- prevention of intermingling with ‘line activities’.
1.8 Scope

The objectives and results identified in sections 1.2 and 1.4 fall within the scope of the project.

The project focuses on the realisation of a broad infrastructure for combating illegal online content (such as texts, photos and videos published online). The following are therefore beyond the scope of this project:

- policy development and legislative drafting;
- developing standards for online content with regard to specific/individual policy dossiers such as online discrimination, online child abuse or online terrorism;
- content on the dark web or in non-public chat groups;
- norming online conduct;
- online behaviour and its root causes.

1.9 Context

Underlying the project is a memo ‘Proposal Online Content Moderation’. This memo was discussed with various stakeholders and served as the starting point for the definition phase of this project.

We refer to the gathering of information and ideas for this memo as the initiation phase. During this phase, connections were sought with ongoing projects within the government (and within the Ministry of Justice and Security in particular) and a framework was developed. Within that framework, a project-based approach to several developments with regard to online content can have added value. During this phase, the following parties were consulted:

<table>
<thead>
<tr>
<th>Memo (initiation phase)</th>
</tr>
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<tbody>
<tr>
<td>Dutch government</td>
</tr>
<tr>
<td>Directorate General for the Administration of Justice and Law Enforcement (DGRR)/Law Enforcement and Combatting of Crime Department (DRC)</td>
</tr>
<tr>
<td>Directorate for Innovation, Knowledge and Strategy (Directorate X)</td>
</tr>
<tr>
<td>National Coordinator for Security and Counterterrorism (NCTV)</td>
</tr>
<tr>
<td>Ministry of the Interior and Kingdom Relations (BZK)</td>
</tr>
<tr>
<td>Ministry of Economic Affairs and Climate Policy (EZK)</td>
</tr>
<tr>
<td>Local government</td>
</tr>
<tr>
<td>Municipality of Zaanstad (drill raps)</td>
</tr>
<tr>
<td>Municipality of Dronten (GPS location)</td>
</tr>
<tr>
<td>Internet industry</td>
</tr>
<tr>
<td>Digital Infrastructure Association Netherlands (DINL)</td>
</tr>
<tr>
<td>Amsterdam Internet Exchange (AMS-IX)</td>
</tr>
<tr>
<td>Online Child Abuse Expertise Centre (EOKM)</td>
</tr>
<tr>
<td>Academia</td>
</tr>
<tr>
<td>Rathenau Institute</td>
</tr>
<tr>
<td>University of Amsterdam (UvA)/Institute for Information Law (IViR)</td>
</tr>
</tbody>
</table>
During the discussion of the memo in the DRC management team and the DGRR management team, a project leader and client were appointed and tasked with drafting a concrete project plan and assembling a project team. We refer to this phase as the **definition phase**. During this phase, we sat down with various parties in order to create a draft project plan. That draft was in turn presented to a number of parties, along with a request for substantive feedback on this preliminary version. During this phase, the following parties were consulted:

<table>
<thead>
<tr>
<th>Project plan (definition phase)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Dutch government</strong></td>
</tr>
<tr>
<td>• DRC</td>
</tr>
<tr>
<td>• Directorate for Security and Management (DVB)</td>
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<tr>
<td>• Directorate X</td>
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<tr>
<td>• NCTV/PNI</td>
</tr>
<tr>
<td>• DGRR/Directorate for the Legal System (DRb)/Privacy policy team</td>
</tr>
<tr>
<td>• Directorate-General for Sanctions and Protection (DGSenB)</td>
</tr>
<tr>
<td>• Directorate-General for the Police and Security Regions (DGPenV)</td>
</tr>
<tr>
<td>• Public Prosecution Service (OM)</td>
</tr>
<tr>
<td>• Police</td>
</tr>
<tr>
<td>• BZK/ Digital Society (DS)</td>
</tr>
<tr>
<td>• EZK/ Directorate for the Digital Economy (DDE)</td>
</tr>
<tr>
<td><strong>Local government</strong></td>
</tr>
<tr>
<td>• Association of Netherlands Municipalities (VNG)</td>
</tr>
<tr>
<td>• Association of Regional Mayors (BRB)</td>
</tr>
<tr>
<td>• Cyber Mayor</td>
</tr>
<tr>
<td><strong>Internet industry</strong></td>
</tr>
<tr>
<td>• The Centre for Crime Prevention and Safety (CCV)</td>
</tr>
<tr>
<td>• Online Child Abuse Expertise Centre (EOKM)</td>
</tr>
<tr>
<td>• NL Confidential</td>
</tr>
<tr>
<td>• Electronic Commerce Platform Netherlands (ECP)</td>
</tr>
<tr>
<td><strong>Academia</strong></td>
</tr>
<tr>
<td>• TU Delft</td>
</tr>
<tr>
<td>• University of Amsterdam (UvA)/Institute for Information Law (IViR)</td>
</tr>
<tr>
<td>• Rathenau Institute</td>
</tr>
<tr>
<td>• Radboud University</td>
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<tr>
<td>• University of Groningen (RUG)</td>
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<tr>
<td>• NHL Stenden University of Applied Sciences</td>
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<tr>
<td><strong>Social interest group</strong></td>
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<tr>
<td>• Bits of Freedom</td>
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</tbody>
</table>

The definition phase is followed by the implementation of the project plan. This phase begins after approval of the project plan by the Steering Committee. The relevant parties who play a role in the project are listed under 3.2. At subproject level, it is specified which parties will be further involved in the implementation. This is reflected in the various subproject plans.
2 Project approach and phasing

2.1 Approach

The approach to the project will be results-oriented combined with great consideration for the environment in which the project operates. Based on the project-based approach, the organisation and leadership of the project will be determined. To ensure that the 'right' products are realised, experts and stakeholders (both internal and external) are involved in various ways and in various project groups.

2.2 Phasing and planning

The project is divided into an initiation phase, a definition phase, an implementation phase and a conclusion phase. Once the project plan is approved, the definition phase will be completed and the implementation phase will start, which will last until January 1, 2025. The results as summarised under 1.4 are the milestones within the project.

At the beginning of the implementation phase, the project secretary will elaborate the planning in greater detail, initially and at minimum for the period up to December 31, 2022.

2.3 Financial matters

The project has its own budget. Even after the project has concluded, this annual amount will be made available on a structural basis in order to structurally secure the project results.

2.4 Communication

Strategic communication is a crucial aspect of this project. For some people, the term 'online content moderation' conjures associations that are not in keeping with the objectives and results of the project. Attention will therefore be paid to communication within all five subprojects. This communication can contribute to achieving the desired results as well as the process itself and building a support base. In doing so, attention can be paid to different forms of communication, which are described in greater detail below.

2.4.1 Internal communication

The term 'internal communication' refers to communication within the Ministry of Justice and Security (JenV) and/or the Dutch government with regard to the project team and the implementation of the project plan. In consultation with the Directorate for Communication (DCom) at JenV, it will be explored whether there are any interesting and relevant aspects to tell about such as the composition of the team, the focus on the victim's perspective, the PPP approach, the project-based working method, DRC 3.0 and so on. Thus, it is mainly about the employees in the project team, our vision, our approach and our methods for working and cooperation. This will allow other units in and outside JenV to benefit from the approach being deployed in PrOCoM. And internal communication can naturally be deployed for the purpose of drawing attention to and highlighting our successes along the way.
2.4.2 **Stakeholder communication**

With regard to stakeholder communication, we focus on the parties that directly or indirectly play a role in the project, on our target groups and on the organisations that will be relevant for taking into effect and safeguarding the final products to be delivered. Communication with these stakeholder groups is aimed at telling our story and fostering support for our products and our approach. Within the project, a number of instruments will be delivered to support administrators and policymakers with regard to online content moderation. The operation and findability of these instruments will be highlighted through product communications. We are aware that storytelling and value-driven information resonate best to make a lasting impression, which in turn makes it more likely that the various instruments will be utilised. DCom is welcome to join us in formulating and reviewing our messages, primarily in the area of public communication; where needed, we hire (in consultation with DCom) additional external capacity.

2.4.3 **Public communication**

Ultimately the Online Content Moderation Project aims to make the Netherlands a little bit better. We feel that the realisation of our plans can really make a difference in the way the internet sector and the Dutch government jointly shape the moderation of online content. This joint effort also includes an important role for the citizens of the Netherlands: to report criminal content and sound the alarm when they are personally harmed by material posted online. In order to tell our story and make citizens aware of how they can file such reports, we will call on the colleagues at DCom for advice on public communication. The more detailed action programme to come will determine how the communication about this will take shape and in which phase of the project it takes place. If necessary, we will – in consultation with DCom – hire additional external capacity to further fulfil this role.
### 3 Project organisation

#### 3.1 Organisational chart

![Organisational chart diagram]

#### 3.2 Roles and responsibilities

<table>
<thead>
<tr>
<th>Role</th>
<th>Responsibilities</th>
</tr>
</thead>
</table>
| Commissioning party (client)      | • Owner of the problem to be solved by the project  
• Provides capacity/resources for the project (is formally responsible for the people and means)  
• Approves the project plan and accepts the project results (in consultation with the Steering Committee)  
• Provides the project with direction in cooperation with the Steering Committee  
• Makes adjustments to the project in the interim (if needed) in consultation with the project leader and the Steering Committee  
• Takes timely decisions at the project leader's request  
• Fosters support for the project at the strategic level (internal and external)  
• Concludes the project (in consultation with the Steering Committee) |
| Project leader (contractor)       | • Day-to-day management of the project  
• Plans and monitors the execution of the project and provides accountability to the client and Steering Committee  
• Fosters support for the project at the tactical level (internal and external) |
<table>
<thead>
<tr>
<th>Role</th>
<th>Responsibilities</th>
</tr>
</thead>
</table>
| Steering Committee            | • Helps give the project direction  
• Takes decisions on issues presented to them  
• Assists in the evaluation and approval of project results  
• Coordinates with and fosters support for the project within their own organisation/sector  
• Advises the client with regard to the completion of project  
• Close connections between professional fields at the departmental level  
• Provides information  
• Maintains support |
| Broad working group           | • Coordinates with project office and the Steering Committee member from their own organisation  
• Preparation of the Steering Committee  
• Substantive expertise to benefit the sub-processes  
• Close connections between professional fields at the departmental level  
• Provides information  
• Maintains support  
• Substantive evaluation of products  
• Input to facilitate the project |
| Project secretary             | • Provides support for leadership and management of the project  
• Provides support for stakeholder management  
• Preparation and reporting for various project groups  
• Procurement processes  
• Financial matters  
• Potential substantive contributions |
| Project office                | • Implements project plan and subproject plans  
• Creates cohesion between the various sub-processes |
| Critical observers            | Provide information, act as a sounding and review board |
4 Project management and control

4.1 Project management

Within the project, a balance must be struck between the planning, costs, scope and quality. It is necessary to identify and recognise deviations in these elements in a timely manner in order to take appropriate measures in response and achieve the intended project results.

Periodically updating the risk matrix is important in this regard. The following agreements are also made for the purpose of project control:

- final responsibility for the management of the project lies with the project leader;
- overall monitoring of the elements of planning, costs, scope and quality is the responsibility of the project secretary;
- the subproject leaders report deviations or anticipated deviations directly to the project leader and project secretary;
- once a month, the project management (the project leader and/or project secretary) and the subproject leaders discuss the topic of ‘project control’. The four elements identified above will, in any case, be addressed in that meeting;
- a report on the main points will be compiled to inform the client and Steering Committee with regard to the project control. In the interim – once every two months, at minimum – the project leader will inform the client as to the status of the project. A deviation report will be compiled if necessary.

4.2 Embedding the project

Ideal vision for the future

The Online Content Moderation Project will conclude at the end of 2024. By that time, PrOCoM will have made an important contribution to setting up a structure within which illegal content on the internet can be effectively addressed by hosts, providers and platforms, backed up by the force of the government, which prosecutes bad apples who refuse to conform to the standards we have set for online content in the Netherlands and in Europe.

The Dutch government and the internet sector cooperate as equals and have established agreements with regard to their respective roles in addressing online content. There is mutual trust and they know how to reach each other when needed in order to strike a joint balance between political desires, policy, commercial interests and implementation. There is a consultative body in which the government and sector come together, and where officials and administrators can also devote attention to political desires from Parliament.

Citizens can submit reports of content that is harmful to them in an easy, user-friendly way. The contact point/hotline has become widely known and people know where to find it when they need it. Swift and effective action is taken in response to reports. The ‘grey’ area – in which there is a question as to whether certain content is illegal or not – is rapidly shrinking as ambiguous cases are referred to the courts or other competent authorities.

Local administrators have a toolkit of instruments for combating public order problems driven by online behaviour. Their civil servants are able to find these instruments online and apply them to specific cases. Local administrators know
when to take up a case within the 'triangle' with the police and Public Prosecution Service, and in which cases they are acting independently outside the criminal justice system. When mayors take responsibility for ordering the removal of specific online content, there is a central point that manages the removal procedure.

Local and state civil servants are increasingly aware of how the internet works and which levers they must pull to achieve the desired effect. They are familiar with the new developments that are emerging and the consequences of these for Dutch society, enabling them to take anticipatory action at an early stage. The Dutch approach serves as an example for Europe and the rest of the world.

To properly safeguard the results, it is essential to clearly identify what added value is generated by the results of the project and how those results relate to the other initiatives currently taking place within the government. Because nearly every ministry deals with online phenomena, there is a broad range of consultative bodies and working groups, the full extent of which is difficult to determine. It is therefore inevitable that, in the course of carrying out the project, we will learn that other initiatives are being deployed to address the same problems. Where this happens, we will strive for synergy and attempt to avoid redundancy, while also ensuring that no gaps emerge in the approach.

To safeguard the proper implementation and embedding of the project, and to deliver products that will actually be used, our project actively focuses on a number of embedding measures:

1. In addition to the Steering Committee, there is a Broad Working Group with policy officers for whom online content is an important part of their work dossier. The activities in connection with the project will be actively shared with them and they will be approached and treated as future administrators.
2. In both 2023 and 2024, PrOCoM will organise an annual conference for stakeholders so that future end users are involved in the development of the products to be delivered and to ensure they receive information about the available instruments at an early stage.
3. From 2025, the ECP will receive an annual subsidy for embedding the public-private partnership. Structural resources have been made available to finance these efforts. A core team of 'initiators' will remain active in order to put forth topics for the agenda, elaborate on those topics and present them to the sounding board group for decision-making.
4. Once a user-friendly and accessible reporting facility has been created, the focus will shift to promoting the name recognition and findability of that contact point/hotline among citizens. Financing for an incidental national campaign will be available from 2025 and there is a permanent sum available for maintaining the contact point/hotline, with an annual budget also available for information provision and communication.
5. The instruments for local administrators will be embedded in the CCV and the maintenance and continued access to those tools will be made part of the basic subsidy the CCV receives from the Ministry of Justice and Security. Funding has been made permanently available for this purpose within the national budget.
6. We are investing in a facility for mayors that meets the needs of local administrators and are looking for possible integrations with existing agencies.
7. With Directorate X, we secure the knowledge network and resources are available to establish a secretariat to support the knowledge consortium and to manage a standard research budget.