

January 2025 – December 2025

Annual Activity Report



Executive summary

Annual Activity Report of The Agency for Digital Government Pursuant to Article 55 of the DSA

01 January 2025 – 31 December 2025

Key Themes in 2025

Capacity Building	Complaint Handling	Cooperation
<ul style="list-style-type: none">• Pilot supervision (Art. 15 & 24)• Mapping of intermediary services• Building data foundation towards risk-based supervision	<ul style="list-style-type: none">• 156 complaints received• Majority forwarded to other DSCs• No formal investigations	<ul style="list-style-type: none">• EU Board participation (6 + 3 meetings)• Participation in Working Groups• One Trusted flagger appointed

The Danish Agency for Digital Government, acting as Denmark’s Digital Services Coordinator (DSC), has in 2025 continued the implementation and enforcement of the Digital Services Act (DSA), focusing on ensuring a safe, transparent and accountable digital environment.

During the reporting period, the Agency received a total of 156 complaints, the majority of which were transmitted to DSCs in other Member States in accordance with the country-of-origin principle. No formal investigations were initiated by the Danish DSC based on these complaints.

The Agency handled a limited number of orders under Article 9, receiving two orders to act against illegal content and none concerning requests for information. The Agency has not received any orders under Article 10.

In the area of institutional mechanisms, one organization, Save the Children Denmark, was successfully designated as a trusted flagger, strengthening the detection of harmful online content. No out-of-court dispute settlement bodies were certified, nor any researchers were granted the status of ‘vetted researchers’ in 2025.

In 2025, a key has been the establishment of supervisory practices, including a pilot project targeting reporting obligations under Articles 15 and 24. The Agency has also initiated the development of a national database of intermediary services to support a more risk-based supervisory approach. Additionally, election-related preparedness activities were undertaken to mitigate risks related to disinformation.

At both national and EU level, the Agency has actively contributed to cooperation and coordination efforts, including participation in the European Board for Digital Services and its working groups.

Overall, 2025 has been characterized by institutional build-up, stakeholder engagement and preparatory supervisory work, laying the foundation for a more mature and risk-based enforcement in the coming years.

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1. Introduction

General introduction DSA

The Digital Services Act (“DSA”) provides harmonised rules for a safe, predictable and trusted online environment when interacting with so called ‘intermediary services’, which include e.g. online platforms, hosting services or search engines. Examples of such harmonised rules are (1) additional transparency requirements on how online platforms moderate content, (2) citizens’ access to out-of-court dispute settlements and (3) rules for the status of trusted flaggers and transparency obligations for trusted flaggers.

The DSA also aims at preventing illegal content online, protecting minors online as well as preventing the spread of disinformation. Providers of Very Large Online Platforms (“VLOPs”) and Very Large Online Search Engines (“VLOSEs”) face additional scrutiny, such as the obligation to provide transparency on advertisements or the publication of their assessment on systemic risks.

The DSA is enforced by the national Digital Services Coordinators (“DSCs”), other national regulators designated as competent authorities in their Member States and for VLOPS and VLOSES by the European Commission. The Agency for Digital Government is the Digital Service Coordinator for Denmark.

The DSA has fully applied since 17 February 2024.

Background information

Article 55 of the DSA requires every DSC to prepare and publish an annual report detailing its activities during the past year. The report must include information on complaints received under Article 53 of the DSA and more specific information such as the number and types of orders to act against illegal content or orders to provide information that were issued by national judicial or administrative authorities in the relevant Member State, according to Articles 9 and 10 of the DSA. The report should also include information on the actions taken in response to these orders, as communicated back to the DSCs.

The DSC will also share this report with the European Commission and the European Board for Digital Services.

For Member States that have designated several competent authorities to be responsible for the supervision and enforcement of the DSA, the DSC is required to consolidate the activities of all competent authorities into one comprehensive annual activity report.

In Denmark, the Agency for Digital Government is the only competent authority for the supervision and enforcement of the DSA.

This annual activity report provides an overview of the activities carried out by the Danish Agency for Digital Government in its role as Digital Services Coordinator and as competent authority during 2025. It presents key information on complaints, orders, certifications, and enforcement actions, as well as national and international cooperation efforts related to the implementation and supervision of the Digital Services Act.

2. Complaints (Article 53 of the DSA)

Introduction

Article 53 of the DSA establishes the right of recipients of intermediary services, or any mandated organisation or association acting on their behalf, to lodge a complaint against providers of these intermediary services alleging an infringement of the DSA. Complaints should be directed to the DSC in the Member State where the recipient of the service is located or established.

The DSC will assess the complaint and, where appropriate, forward it to the DSC in the Member State where the provider of the intermediary services is established, possibly accompanied by an opinion. If the complaint falls under the responsibility of another competent authority within the same Member State, the DSC will transfer the complaint to the appropriate relevant authority.



Complaints in 2025

In 2025, the Danish Agency for Digital Government received 156 complaints in total, of which 154 were directly submitted to the Agency and 2 were transferred to the Agency by another DSC. The Danish Agency for Digital Government transmitted 119 complaints to the Irish DSC (Coimisiún na Meán), 3 complaints to the German DSC (Bundesnetzagentur für Elektrizität, Gas, Telekommunikation, Post und Eisenbahnen) and 2 complaints to the Dutch DSC (Autoriteit Consument en Markt).

Complaints that led to formal investigations in 2025

In 2025, the Danish Agency for Digital Government did not launch a formal investigation stemming from a complaint received under Article 53 of the DSA.

3. Orders (Article 9 and 10 of the DSA)

Introduction

Article 9 of the DSA outlines the obligations of providers of intermediary services when they receive an order from national judicial or administrative authorities to act against illegal content. First, when a provider receives such an order, they must inform the issuing authority (or another specified authority) about any effect given to the order, specifying if and when effect was given to the order. The article also sets conditions for the orders issued by national authorities.

The issuing authority, or another specified authority if this is stated in the order, must share the order and any information about its implementation with the DSC in the Member State of the issuing authority. The DSC will then share this information with all other DSCs.

Article 10 of the DSA obliges providers of intermediary services to promptly inform the relevant national judicial or administrative authority, or any other authority specified in the order, upon receiving an order to provide specific information about individual recipients of their services. The article also sets conditions for the orders issued by national authorities. Similarly to Article 9 of the DSA, Article 10 of the DSA also sets conditions for the orders issued by national authorities. The issuing authority, or another specified authority if this is stated in the order, must also share the order and any information about its implementation with the DSC in the Member State of the issuing authority. The DSC will then share this information with all other DSCs.

Orders in 2025

In 2025, the Agency for Digital Government received *two* orders pursuant to Article 9. No orders pursuant to Article 10 of the DSA was received in 2025.

4. Out-of-court dispute settlement bodies (Article 21 of the DSA)

Introduction

Under the DSA, out-of-court dispute settlement bodies offer an additional opportunity for users to resolve content moderation disputes with online platforms. Online platforms must inform users of this option for resolving disputes and are also required to cooperate with the procedures of certified out-of-court dispute settlement bodies. Upon request, DSCs certify out-of-court dispute settlement bodies located in their Member State if they meet the statutory requirements set out in Article 21 of the DSA. For example, the out-of-court dispute settlement bodies must be independent. In addition, they must have sufficient expertise, for example, in a certain type of illegal content. The out-of-court dispute settlement bodies must handle disputes in at least one official EU language.

Certification of out-of-court dispute settlement bodies in 2025

In 2025, the Agency for Digital Government *did not* receive any applications and therefore no out-of-court dispute settlement bodies were certified.

5. Trusted Flaggers (Article 22 of the DSA)

Introduction

Under the DSA, trusted flaggers are responsible for detecting potentially illegal content and alert online platforms. They are experts at detecting certain types of illegal content online, such as hate speech or terrorist content, and notifying it to the online platforms. The notices submitted by them must be treated with priority by online platforms as they are expected to be more accurate than notices submitted by an average user. The DSC of the Member State of establishment of the applicant entity awards the trusted flagger status. The DSCs oversee the application process, ensuring the entities meet the criteria laid down in Article 22 of the DSA, such as independence from any online platform or specific expertise. Pursuant to Article 22 (8) of the DSA, the Commission, after consulting the Board, shall, where necessary, issue guidelines to assist providers of online platforms and the DSCs in the application of these criteria. The guidelines are scheduled to be adopted in Q2 2026.

Trusted Flaggers in 2025

In 2025, the Agency for Digital Government received one trusted flagger application and awarded one entity the status of trusted flagger. The appointed trusted flagger is Save the Children Denmark (Red Barnet Danmark), a non-profit non-governmental children's organisation which focuses on extortion, data protection and privacy violations, illegal speech, non-consensual behaviour, online bullying/intimidation, offense to minors, violence and scams and/or fraud. The Agency for Digital Government did not reject any trusted flagger applications in 2025. Some of the remaining applications have been withdrawn, while others are still pending.

6. Vetted Researchers (Article 40 of the DSA)

Introduction

Vetted researchers are researchers that have the right to access non-public data for their research on systemic risks or measures to mitigate them at the Very Large Online Platforms and Search Engines. Systemic risks are risks that can inflict serious harm to society or the economy at large, for example the widespread dissemination of illegal content or election interference. In order to gain access to relevant data, the DSC of the Member State of establishment of the specific Very Large Online Platform or Search Engines can grant the status to a researcher when the researcher has demonstrated to meet the conditions laid down in Article 40 of the DSA. Very large online platforms and search engines are required to give researchers access to the specific data that they have been granted the status of vetted researcher.

Status granted to vetted researchers in 2025

In 2025, the Agency for Digital Government did not receive any applications from entities for the status of vetted researcher. Also, the Agency of Digital Government has not yet granted the status of vetted researcher to any entity. In preparation of the entry into force, the Agency of Digital Government's website was updated with information on Data Access and the application process.

7. Enforcement and (inter)national activities

Introduction

In 2025, DSCs and other competent authorities engaged in a range of enforcement activities, complemented by various international and national initiatives, both formal and informal, aimed at fostering compliance, enhancing cooperation, and ensuring the effective implementation of the DSA.

Enforcement activities and investigation powers used in 2025

Initiation of supervision with reporting obligations under DSA Article 15 and 24

The Agency of Digital Government has initiated the establishment of its first targeted supervision of obligations under the DSA, specifically the reporting obligations in Articles 15 and 24. The supervision is being carried out as a pilot project with two overarching objectives: to gain practical experience and to map the extent to which the affected services are aware of their DSA obligations.

The initial phase will primarily verify that the selected services are indeed covered by Article 15 and/or Article 24. In the subsequent phase of the supervision, an assessment will be made of whether the services have fulfilled their reporting obligations, including whether they have used the European Commission's standardized template set out in IR (EU) 2024/2835.

The aim of the pilot is to generate a sufficient data foundation to expand the supervision and increasingly use a risk-based approach.

Industry meeting with relevant stakeholders in relation to reporting obligations

The Agency of Digital Government organized an information session for several of Denmark's largest and most relevant industry associations, with the aim of raising awareness of the reporting obligations established under the Digital Services Act.

Delivering a comprehensive overview of the reporting duties imposed by Articles 15 and 24, the Agency of Digital Government clarified the legal framework, the scope of the obligations and the procedural steps that providers must follow.

The Commission, represented by the Danish DSA Officer, attended the meeting and contributed with an in-depth walkthrough of the reporting templates contained in Commission Implementing Regulation (EU) 2024/2835.

The stakeholders responded positively to the session, actively engaging with the material and posing numerous insightful follow up questions that demonstrating a strong willingness to disseminate the information about the reporting obligations to their members.

Determining intermediary services subjected to national supervision

The Agency of Digital Government has begun a systematic process of further mapping, classifying, and qualifying the intermediary services subjected to national supervision. The aim of this work is to create a reliable and usable database for the Agency to expand and target risk-based supervision as well as ensuring that all relevant intermediary services are included in the database.

National activities in 2025

Denmark's regional and municipal elections took place on the 18th of November 2025. As part of election preparedness, the Agency of Digital Government mapped out stakeholders from other authorities involved in reporting and detecting dis- and misinformation. A bilateral meeting was held early in the process with the responsible authority for the regional election regarding the DSA jurisdiction and escalation channels. The obligations for VLOPS and VLOSE under the DSA was included in communication material for the electoral candidates as well as information on how to contact the Agency of Digital Government.

International activities

European Board for Digital Services

The European Board for Digital Services (the "Board") aims to contribute to a safe, predictable, and trusted online environment that promotes innovation while safeguarding the protection of fundamental rights. Through the Board, the European Commission and the Digital Services Coordinators work together as a cohesive team, adopting a European approach to the enforcement of the DSA. The Board thus plays a vital role in ensuring the consistent application of the DSA across the European Union, benefiting all European citizens, society, and the economy.

The Board is the platform for discussing all relevant issues and priorities regarding the application of the DSA. Close, trustful cooperation and coordination, taking into account the specific impact of intermediary services in individual Member States, are essential for effective and coherent enforcement of the DSA throughout the European Union.

For DSCs participating in the Board, it is important to actively contribute to this process. Board members support, advise, and assist the European Commission and the other DSCs in their supervisory tasks. They provide each other with insights and expertise, consult external experts when necessary, and contribute to the analysis of emerging issues related to digital services within the internal market. Therefore, participation in the Board requires an active role in collaboration and working together to ensure DSA compliance, with attention to the specific context of each Member State.

In 2025, the European Board for Digital Services held a total of 6 meetings and 3 ad hoc meetings. These meetings served as a critical platform for discussing the ongoing implementation and enforcement of the Digital Services Act (DSA) across the European Union. The meetings provided an opportunity for Board members to engage in in-depth deliberations on a variety of issues and priorities related to the digital services landscape. Each meeting played a significant role in advancing the collective goals of ensuring a safe, transparent, and innovative digital environment across the EU.

The Agency for Digital Government attended all Board meetings in 2025. In addition, experts of the Agency for Digital Government have participated in a number of Working Groups that have been established under the Board, especially Working Group 1, 3, 5 and 6¹.

In the Working Groups, the Agency for Digital Government has contributed to different work streams, e.g. given written contributions to the drafting of the guidelines on the protection of minors (article 28) as well as the upcoming guidelines on trusted flaggers (article 22).

¹ <https://digital-strategy.ec.europa.eu/en/policies/dsa-board-working-groups>

8. Conclusions

The year 2025 marked a transitional phase in the Danish implementation of the Digital Services Act, moving from initial setup towards more structured and proactive supervision.

While enforcement activities remained relatively limited in quantitative terms, significant progress has been made in building institutional capacity, clarifying regulatory expectations and engaging with stakeholders. The initiation of pilot supervision projects and the mapping of intermediary services represent important steps towards a more data-driven and risk-based enforcement model.

Looking ahead, the Agency will focus on the following strategic objectives:



In conclusion, 2025 has laid a solid operational and strategic foundation, positioning the Agency to scale up enforcement and ensure effective application of the DSA in the years to come.

