Banc Ceannais na hÉireann
Central Bank of Ireland
Eurosystem

Report on activities under the Digital Services Act

April 2026

This report is issued by the Central Bank of Ireland in its capacity as a Trusted Flagger under the Digital Services Act, to Coimisiún na Meán, the designated Digital Services Coordinator in Ireland. The European Commission together with the national Digital Service Coordinators are responsible for supervising, enforcing and monitoring compliance by internet service providers with the Digital Services Act.

Introduction

In April 2025, Coimisiún na Meán granted 'trusted flagger' status to the Central Bank of Ireland under the Digital Services Act, the first such appointment in Ireland.

This accreditation has strengthened our ability to protect consumers from online financial scams and fraud and runs for an initial 3-year period to April 2028.

Our work on online frauds and scams – a brief explainer

Our mission at the Central Bank is to serve the public interest by maintaining monetary and financial stability while ensuring that the financial system operates in the best interests of consumers and the wider economy. We are clear that in the current macro-environment, combatting financial crime needs to be a priority for all agencies and firms involved with financial services.

The Central Bank recognises that digital fraud and scams pose a growing threat to consumers, both in Ireland and globally. No single agency or firm can effectively combat digital fraud. Success requires coordinated effort across the financial and non-financial sectors, with all stakeholders working together to address rapidly evolving fraud techniques and typologies. The Central Bank actively collaborates with a broad coalition of stakeholders with a view to our collectively combatting this problem.

In 2024, the Central Bank commenced engaging with certain large technology firms, encouraging them to introduce financial services advertisements verification (FSAV) in Ireland - a key disruptive mechanism in the fight against online financial scams. Google introduced such a mechanism in Ireland in late 2024, to the benefit of Irish consumers.

We regularly collaborate in our work with domestic authorities such as An Garda Síochána, and international bodies including the International Organization of Securities Commissions (IOSCO). As a matter of course, the Central Bank reports, in line with its statutory obligations, relevant information regarding any suspected offence to An Garda Síochána and any other enforcement agencies, as appropriate.

We continue to raise standards in the firms we regulate, so they protect and support their customers, including when they fall victim to frauds and scams. We also support public policy and legislation, so we keep pace with the policy implications of technology and the types of criminal behaviour to which consumers are exposed.

Our multi-pronged approach which involves education, disruption and enforcement, includes raising consumers' awareness on how to protect themselves against frauds and scams and detecting and enforcing against unauthorised providers of financial services. The Central Bank also seeks to disrupt frauds and scams by breaking the link between the perpetrators of the frauds and scams and the victims. One way in which we seek to do this is by reporting suspect content to internet service providers (ISPs), including under the Trusted Flagger regime.

What is a Trusted Flagger?

The Trusted Flagger initiative was introduced under the Digital Services Act (DSA). A Digital Services Coordinator can award “trusted flagger" status to entities within designated areas of expertise that have a unique competence to identify specific types of illegal online content.

The Central Bank's stated area of expertise is financial scams and frauds, including the provision and/or offer of financial services without authorisation.

The Central Bank receives and investigates reports of suspected instances of parties offering financial services/products without the required authorisation.

Our experience is that the majority of unauthorised providers of financial services operate solely online and are pretending to provide financial services with the intention of committing fraud. As mentioned above, the Central Bank takes a multi-pronged approach to dealing with these enterprises, one focus of which is disruption. As part of our disruption activities, we look to procure the removal of illegal online content in a timely and efficient manner. We have been reporting suspect content to ISPs since 2024. The Trusted Flagger accreditation enhances our ability to be more effective when issuing these reports.

Under Article 16 of the DSA, all ISPs that host online content are legally obliged to review and make decisions on any illegal content reported to them by the Central Bank (or any other individual or entity) regarding financial scams and fraud.

Since having been accredited as a Trusted Flagger under Article 22 of the DSA, certain online platforms must prioritise reports made by the Central Bank under Article 16. This requirement to prioritise reports by Trusted Flaggers does not apply to all ISPs. To that end, the Central Bank distinguishes below between Article 16 notices issued to ISPs in reliance on our Trusted Flagger accreditation and otherwise.

In accordance with Article 22(3) of the DSA, Trusted Flaggers are obliged to publish, at least once a year, clear and detailed reports on notices submitted under the DSA. This, our first such report, covers the period from 2 April 2025 to 31 December 2025 (“the Reporting Period”).

The European Commission and the Digital Services Coordinators have investigative powers where they suspect breaches by ISPs of their obligations under the DSA. They also have the power to impose fines, periodic penalties and other measures where appropriate. Reports by Trusted Flaggers should assist these bodies to identify, assess and pursue, as and where appropriate, non-compliance with the requirements of the DSA.

In addition, under the DSA ISPs are not liable for user-provided content provided they do not have actual knowledge of illegal content and once they act expeditiously to remove it upon obtaining such knowledge. Notices issued under Article 16 shall be considered to give rise to actual knowledge where they allow a diligent ISP to identify the illegality of the relevant activity or information without a detailed legal examination.

Observations

As mentioned, the Central Bank was accredited as a Trusted Flagger in April 2025. That accreditation was listed on the European Commission's website in late May 2025.

Certain online platforms informed the Central Bank that until our accreditation as a Trusted Flagger was published on the European Commission's website, they would not engage with the Central Bank regarding how we should submit reports under the Trusted Flagger regime.

Ultimately, the process of onboarding (namely, getting access to the correct portals in the online platforms through which we would submit our reports so that they could be identified and prioritised appropriately), took time in some instances.

Once onboarded, and conscious that the Trusted Flagger regime was relatively new for all, further engagement with some of the online platforms was necessary to address various practical issues the Central Bank was encountering as regards submitting reports. By way of example, these issues included limitations with the portals through which the Central Bank was required to submit reports, and in respect of one online platform, a lack of substantive engagement with/action taken in respect of these reports. We have seen improvements made and action taken on foot of these engagements.

Overall, our experience of using the regime to date has proved to be positive. For the most part, we are experiencing faster response times when we submit notices relying on our Trusted Flagger accreditation. We look forward to building upon the significant work carried out in 2025 in operationalising our use of the accreditation.

Separately, and as mentioned above, in addition to those reports issued by the Central Bank using our Trusted Flagger accreditation, we also issued Article 16 reports to hosting entities, such as the webhosting providers, who do not come within scope of the Trusted Flagger regime but who have obligations under the DSA. These obligations include acknowledging, processing and making decisions on notices received, in a timely and objective manner and notifying the reporter of the decisions made.

Our view is that the timely removal of illegal content by webhosting providers on receipt of an Article 16 report is an extremely effective way of disrupting frauds and scams online and of preventing harm to consumers and investors. Unfortunately, our experience is that there are varying degrees of compliance with the requirements of Article 16 by the webhosting providers.

Finally, it is clear that while the Trusted Flagger regime brings benefit from a consumer protection perspective, it should be recognised that this is a reactive mechanism that is deployed following publication of illegal content. The content notified by the Central Bank in its role as Trusted Flagger relates to advertisements for unauthorised / scam financial services. The adoption by online platforms of an effective FSAV mechanism is, in our view, a more effective means of protecting consumers from the harm posed by such advertisements as it prevents consumers being exposed to them in the first place. The impact of an effective FSAV mechanism in terms of combatting fraud is real and immediate and brings with it a significant reduction in offending content. In the absence of this, fraudsters will continue to exploit digital advertising, enabling scams to reach consumers at scale.

Notices Submitted During the Reporting Period

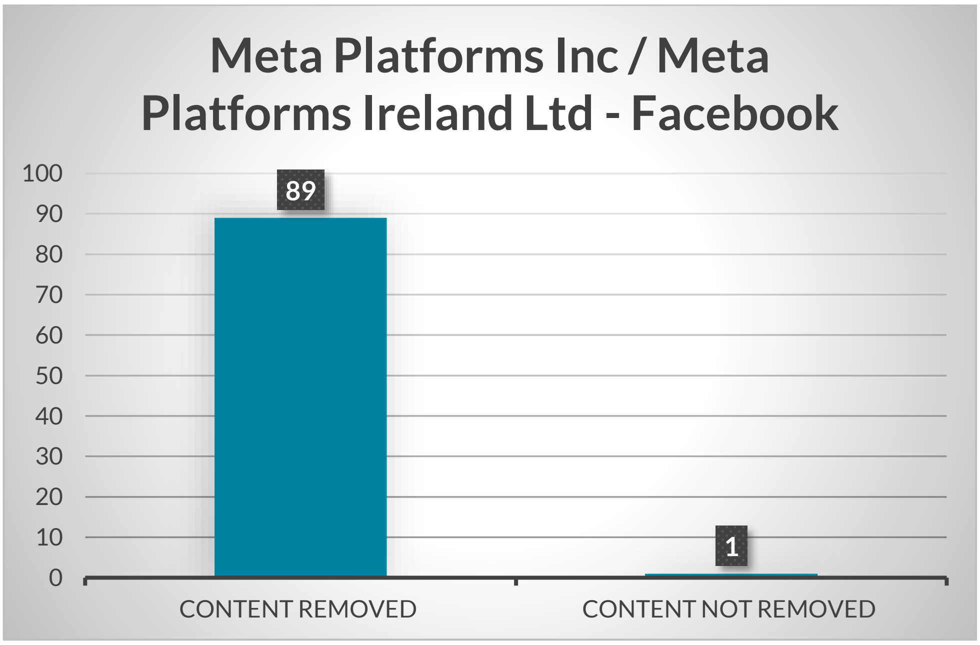
All reports or notices submitted to ISPs during the Reporting Period related to suspected unauthorised provision of financial services/products.

The charts below include the number of URLS reported to each ISP, together with the action taken or status of the suspect content.

The total number of URLs reported during the Reporting Period was 333.

REPORTS ISSUED UNDER TRUSTED FLAGGER REGIME

Chart 1: Total number of URLs reported to Meta Platforms Inc / Meta Platforms Ireland Ltd regarding Facebook during the Reporting Period with the action taken or status of the suspect content[1]



[1] As at 30 January 2026

Chart 2: Total number of URLs reported to Meta Platforms Inc / Meta Platforms Ireland Ltd regarding Instagram during the Reporting Period with the action taken or status of the suspect content[2]

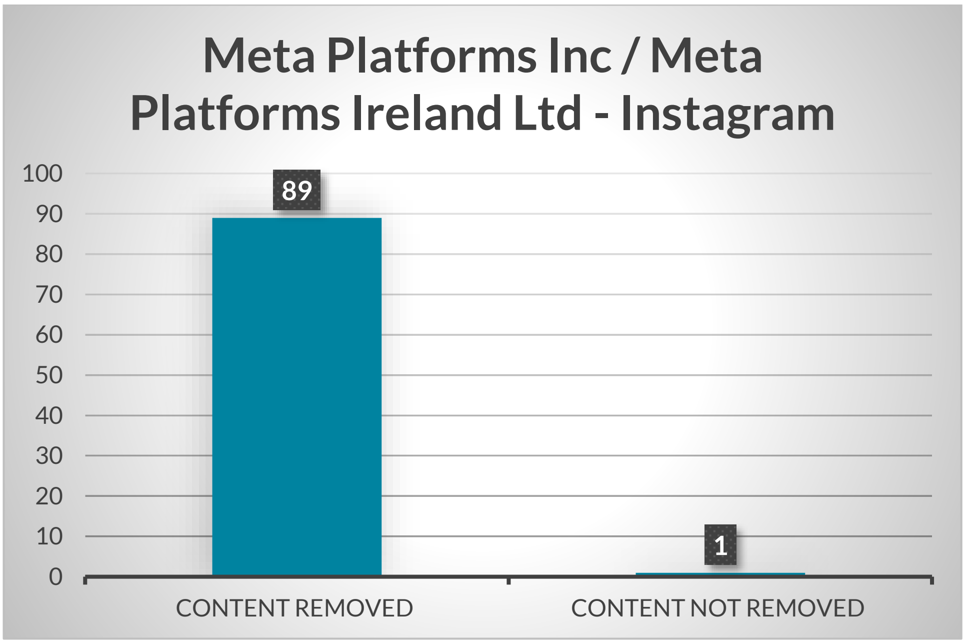
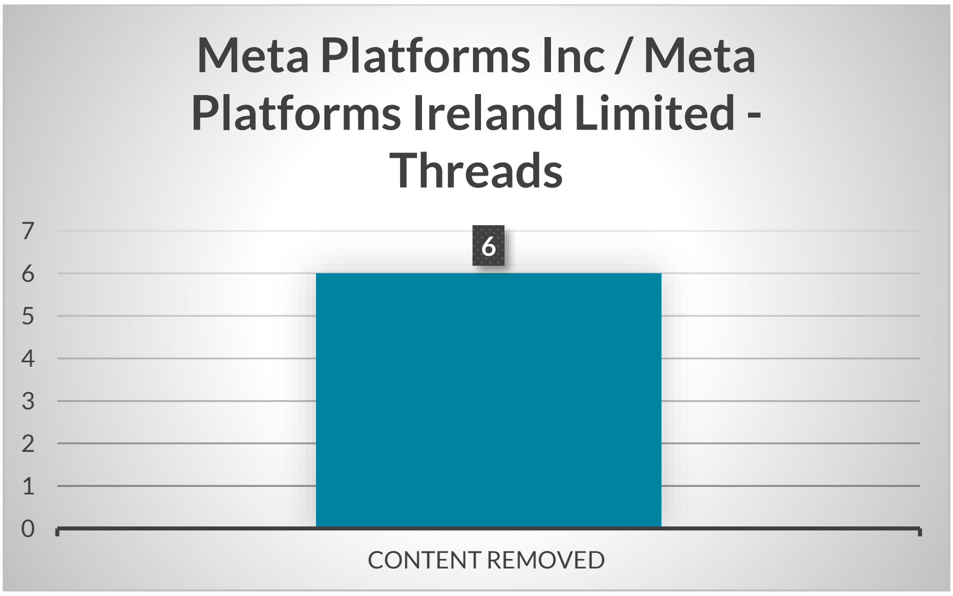
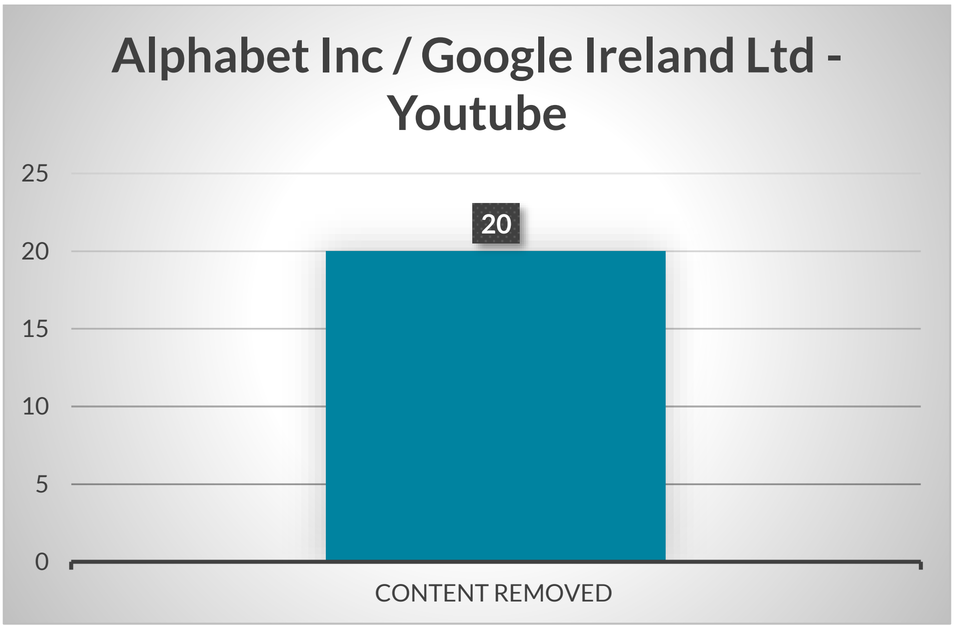


Chart 3: Total number of URLs reported to Meta Platforms Inc / Meta Platforms Ireland Ltd regarding Threads during the Reporting Period with the action taken or status of the suspect content[3]



[2] As at 30 January 2026
[3] As at 30 January 2026

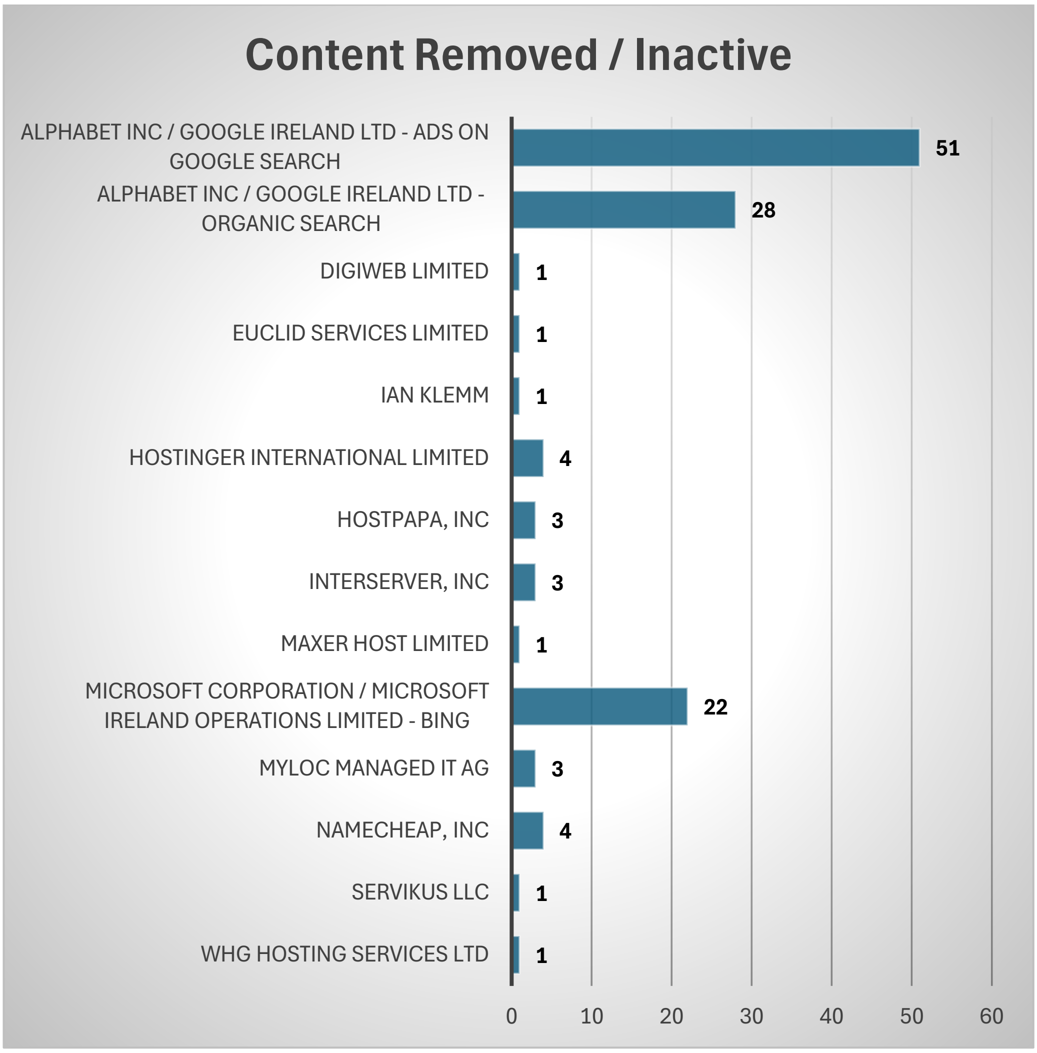
Chart 4: Total number of URLs reported to Alphabet Inc / Google Ireland Ltd regarding Youtube during the Reporting Period with the action taken or status of the suspect content[4]



[4] As at 30 January 2026

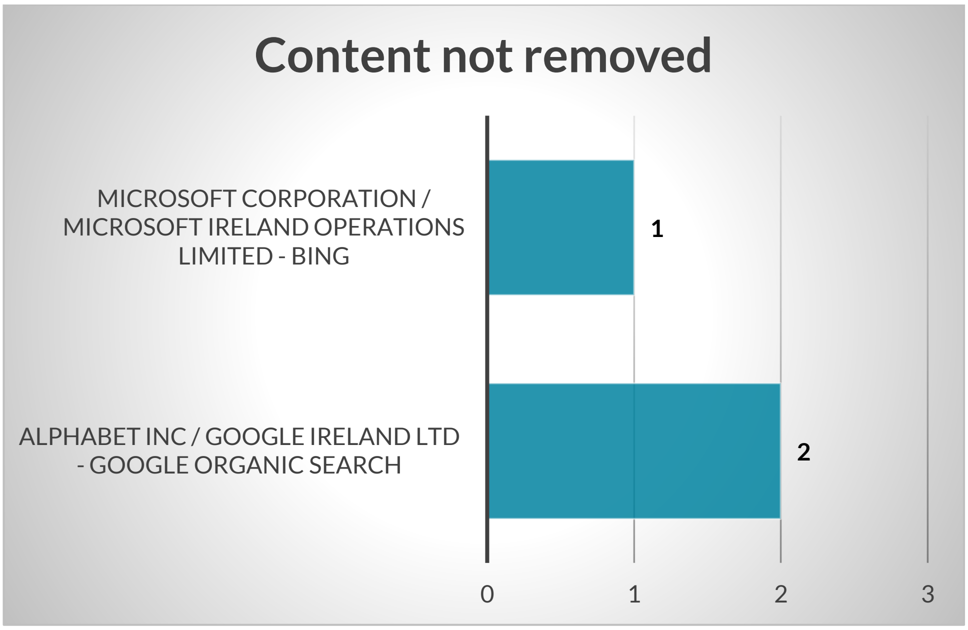
REPORTS ISSUED UNDER ARTICLE 16, NOT RELYING ON TRUSTED FLAGGER

Chart 5: Total number of URLs reported to ISPs during the Reporting Period, where the content was removed or became inactive[5]



[5] As at 30 January 2026

Chart 6: Total number of URLs reported to ISPs during the Reporting Period, where the content was not removed[6]



Statement on Independence

The Central Bank of Ireland is an independent statutory body pursuant to the Central Bank Act 1942. Its independence is enshrined in law and in practice. The procedures in place to underpin this independence include staff rules which include rules regarding avoiding conflicts of interest and behaving ethically.

[6] As at 26 January 2026

T: +353 (0)1 224 5800
E: publications@centralbank.ie
www.centralbank.ie

Banc Ceannais na hÉireann
Central Bank of Ireland

Eurosystem