



**MAKING
PLATFORMS
ACCOUNTABLE
EMPOWERING
USERS &
CREATING SAFETY**

November 2025

ABOUT ORG

Open Rights Group (ORG): Founded in 2005, Open Rights Group (ORG) is a UK-based digital campaigning organisation working to protect individuals' rights to privacy and free speech online. ORG has been following the UK government's proposed reforms to data protection since their inception.

ABOUT THIS REPORT

Written by Megan Kirkwood with contributions from Jim Killock.

Published in November 2025.

Published by Open Rights, a non-profit company limited by Guarantee, registered in England and Wales no. 05581537. Space4, 113-115 Fonthill Road, London N4 3HH.

Published under a Creative Commons Attribution Sharealike licence (CC BY-SA 4.0).



CONTENTS

EXECUTIVE SUMMARY.....	9
INTRODUCTION: THE ATTENTION MARKET.....	10
THE ECONOMIC MODEL.....	11
CONTENT PRIORITISATION.....	13
PUSHING PROBLEMATIC CONTENT.....	15
DRIVING PROBLEMATIC REVENUE MODELS.....	20
PERSONALISATION AND DATA.....	21
MARKET DOMINANCE IN ADVERTISING.....	23
CHANGING THE RULES FOR CONTENT CREATORS.....	25
NO ESCAPE: THE RELATIONSHIP OF MONOPOLY TO THE ATTENTION MARKET	33
THE DISRUPTIVE POWER OF INTEROPERABILITY.....	35

MANDATING INTEROPERABILITY.....	36
INTEROPERABILITY WITHIN AND BETWEEN PLATFORMS.....	39
SOCIAL SWITCHING: HORIZONTAL INTEROPERABILITY.....	41
“FREE THE FEEDS”: VERTICAL INTEROPERABILITY.....	43
INTEROPERABILITY IS WITH US AND IT WORKS.....	45
TELECOMS.....	46
DE-CONCENTRATING THE MARKET.....	46
PHONE NUMBER PORTABILITY.....	48
INTERNET PROTOCOLS.....	49
SOCIAL MEDIA ONCE ENCOURAGED OPENNESS.....	51
OPEN BANKING AND INTEROPERABILITY IN THE FINANCIAL SECTOR.....	52
GOVERNMENT USE OF INTEROPERABILITY IN PROCUREMENT.....	55
EXISTING MODELS OF SOCIAL MEDIA INTEROPERABILITY.....	58
ACTIVITYPUB.....	59
THREADS AND MASTODON.....	61

GROWTH OF ACTIVITYPUB.....	65
AT PROTOCOL.....	66
SCALABILITY.....	69
CAN BLUESKY AND AT PROTOCOL BECOME FULLY DECENTRALISED?.....	70
FREE OUR FEEDS.....	75
OTHER PROTOCOLS.....	76
CONNECTING SOCIAL NETWORKS.....	77
BRIDGY FED.....	77
SURF.....	78
SILL.....	78
CROSS POSTING.....	79
SOCIAL GRAPH PORTING.....	80
WHICH PLATFORMS USE THESE PROTOCOLS?.....	80
ACTIVITYPUB.....	80
AT PROTOCOL.....	81
GOVERNMENT AND SOCIETY ARE FUELLING SOCIAL MEDIA MONOPOLIES.....	83
ADVERTISING.....	83

INVESTMENT IN SOCIAL MEDIA CONTENT.....	86
THE BENEFITS OF BREAKING UP SOCIAL MEDIA MONOPOLIES.....	88
REDUCING DISTORTION OF THE INFORMATION ENVIRONMENT.....	89
REMOVING THE CHILLING EFFECT ON MARGINALISED VOICES.....	91
PREVENTING WRONGFUL CONTENT SUPPRESSION.....	96
USER CHOICE AND USER EXPERIENCE.....	98
MODERATION AND SAFETY.....	100
REDUCING HATE SPEECH: BLACKSKY.....	100
SAFER SPACES IN MASTODON NETWORKS.....	104
MASTODON'S LGBTQ+ COMMUNITY.....	105
MASTODON AND PEOPLE OF COLOUR.....	105
IMPROVING USER SAFETY.....	106
CASE STUDY: PEERTUBE FOR EDUCATION.....	109
OTHER PEERTUBE USERS.....	110
IMPROVEMENTS WITHIN PLATFORMS.....	110

DEMANDING BETTER.....	111
WHAT SOCIAL MEDIA COMPETITION COULD LOOK LIKE.....	112
SHARING CONTACT DATA.....	113
CROSS POSTING.....	114
PLATFORM FEDERATION.....	117
DATA PORTABILITY.....	118
COMPETITIVE PRESSURE TO INNOVATE.....	119
BUSINESSES AND ORGANISATIONS.....	121
CREATOR SWITCHING COSTS.....	122
API INVESTMENTS ARE BETTER PROTECTED.....	124
BUSINESSES REDUCE DEPENDENCY ON BIG TECH.....	126
LEGAL TOOLS FOR INTEROPERABILITY.....	128
THE DIGITAL MARKETS, COMPETITION AND CONSUMERS ACT.....	129
CURRENT SMS DESIGNATION INVESTIGATIONS.....	133

FUTURE SMS DESIGNATION: SOCIAL MEDIA MARKET.....	134
THE OBJECTIONS, COUNTERED.....	136
CREATION OF PROBLEMATIC NETWORKS.....	137
FEW USERS WILL AVAIL THEMSELVES OF SWITCHING.....	139
FEW USERS WILL TAILOR THEIR FEEDS.....	141
PRIVACY AND SECURITY CONCERNS.....	142
CLAIMS THAT THE MARKET IS ALREADY COMPETITIVE.....	147
MINIMAL COMPLIANCE AND RESISTANCE TOWARDS OBLIGATIONS.....	148
RECOMMENDATIONS.....	151
GOVERNMENT CAN STOP FAVOURING SPECIFIC PLATFORMS.....	151
THE CMA CAN BUILD THE CASE AND TAKE ACTION.....	153
ORGANISATIONS CAN SUPPORT THE CHANGE.....	155

EXECUTIVE SUMMARY

Social media platforms dominate the online “attention market,” where user engagement and personal data are monetised through targeted advertising. This model, built on surveillance and algorithmic prioritisation, drives polarising and shocking content to maximise time spent within these platforms’ products. A handful of platforms, mainly owned by Meta and Google, control most of the UK’s digital advertising revenue and shape the flow of information, with serious consequences for democracy, the information economy, and user wellbeing.

We argue that many harms associated with social media, such as misinformation, hate speech, suppression of marginalised voices, and loss of user control, are symptoms of this economic and structural concentration. Network effects mean that users, creators, and advertisers are locked into dominant platforms, unable to switch without losing audiences or revenue. This lack of competition entrenches harmful business models and leaves users exposed to unsafe environments.

To break this cycle, interoperability, or the technical ability of platforms to connect and communicate, is a key remedy. Mandated interoperability can

MAKING PLATFORMS ACCOUNTABLE

lower switching costs, allow users to retain their social networks across platforms, and enable competitors to offer alternative moderation systems, recommendation feeds, or advertising models. Interoperability is typically examined as “horizontal interoperability”, here meaning interaction between different networks, including cross-communication and “social switching”; and vertical interoperability, within a service, in which dominant platforms open up components of their services such as alternative prioritisation and moderation services, in order to “free the feeds”.

Existing models show that interoperability works. Telecoms regulation, Internet protocols, and Open Banking demonstrate how mandated access can de-concentrate markets and empower consumers. Mobile network switching exists through regulation. Emerging decentralised social networks such as Mastodon (ActivityPub) and Bluesky (AT Protocol) provide working examples, allowing communities to govern themselves and experiment with safer, user-controlled moderation.

Our report highlights how government and society continue to fuel monopolies through advertising expenditure and policy dependence on major platforms. It urges the UK to apply its new Digital Markets, Competition and Consumers Act 2024, enabling the Competition and Markets Authority (CMA) and its Digital Markets Unit (DMU) to impose

EMPOWERING USERS AND CREATING SAFETY

interoperability and data-portability obligations on firms with Strategic Market Status.

Interoperability offers wide benefits: restoring user choice and innovation, protecting creators and small businesses, improving safety through federated moderation, and reducing the incentives for disinformation. We call on government, regulators, and civil society to act together, to demand and create open, connected social media that place user rights, transparency, and competition at the centre of the digital ecosystem. We provide recommendations from the simple to the more complex that can make this come about.

THE ATTENTION MARKET

Critics of social media are usually united on their views of social media companies as causing ill effects on society, but can be divided on the response. Some favour imposing duties on platforms, while others, like ORG, worry about the consequences and risks of embedding regulatory reliance on problematic businesses.

Looking beyond initial preferences, however, there is frequently a consensus that it is the economic model that the platforms are operating that is driving many of the problems. So we start this report with a review of the economic model.

In this section, we cover the relationship between users, the platform, advertisers and content. We describe how the attention market and network effects drive towards concentrated power. We turn to the use of aggregated personal data and profiling in driving problematic content, arguing that there is no practical escape for users in the current relationship.

THE ECONOMIC MODEL

The dominant economic model for digital platforms has long been one in which users are given services for free, while either investors or advertisers pay for the service to be provided. This is known as a multi-sided market, in which a platform “enables interactions between two or more distinct parties”.¹

Facebook for example can be described as “an example of a multi-sided platform that connects users, advertisers, and third-party developers”.² On one side of this market, users get access to a free platform to interact with content shared by the accounts they follow or are connected to, and in turn, can create and share their own content within their network.

This is supported by digital advertising, which is on the other side of the multi-sided market, as platforms sell advertising inventory, that is, empty spaces on websites or apps, to advertisers. Google and Meta (Facebook) are the biggest advertising networks in the world, as spaces on their platforms are highly sought after due to their significant presence worldwide and high market concentration. Advertising on their platforms is largely

-
- 1 Helmond, Anne. “The platformization of the Web: Making web data platform ready.” *Social Media + Society*, vol. 1, no. 2 (July 2015), p. 2, <https://doi.org/10.1177/2056305115603080>.
 - 2 Helmond 2015, p. 2.

MAKING PLATFORMS ACCOUNTABLE

performed through personalised advertising, meaning platforms collect information about their users to better determine what ads should be shown to them, as personalised advertising is more likely to be relevant to the user and therefore, more likely to follow through with a purchase.

For this model to work, users must interact with the platform regularly. This is why platforms are often referred to as “attention markets”, as they are in the market of keeping users on the platform and interacting with it.³ This, in turn, generates more data, which can be monetised via advertising. In addition, the more time a user spends on the platform, the more ads they are able to view and potentially make purchases through, which generates ad revenue.

The more users spend time on a platform, interact with content and produce content (by publishing content or even just through “likes” and comments), the more the platform as a whole is valuable to other users. Social media platforms rely on “network effects,” whereby a platform is more valuable the more people are on it (there is little value in being on Facebook if you have nothing to look at because you have no friend connections).⁴ The more interesting accounts and content there are, the

3 Wu, Tim (2017) *The Attention Merchants: The Epic Scramble to Get Inside Our Heads*. Atlantic Books.

4 McIntyre, David P, and Arati Srinivasan. “Networks, Platforms, and Strategy: Emerging Views and Next Steps.” *Strategic Management Journal*, vol. 38, no. 1 (Oct. 2016), pp. 141–60. <https://doi.org/10.1002/smj.2596>.

EMPOWERING USERS AND CREATING SAFETY

more valuable a platform becomes for users, which spurs more people to join. Network effects extend to advertisers who spend more on the platform as potential customers become concentrated there.

Additionally, third-party developers form part of the multi-sided market, as they add apps and add-ons (like games or new functionalities) to add further value to the platform, keeping users' attention on the platform.⁵ Network effects can lead the market to tip, as all the users congregate on one concentrated platform, and in turn, advertisers, developers and content creators all concentrate their efforts on that platform, which gives it immense power.

CONTENT PRIORITISATION

While social media platforms like Facebook and Instagram used to organise the user interface as a chronological timeline, this has adapted over time. To keep users on the platform, content is algorithmically prioritised to favour content with high engagement, shown via a recommender system, serving users potentially endless feeds to engage with.

MAKING PLATFORMS ACCOUNTABLE

TikTok, the hugely popular app for creating and watching short-form videos, is well-known for its recommender feeds. Unlike Instagram and Facebook, where users primarily use the platform for friend connections, blended with the option to view content recommended to them (such as Instagram's *For You* section⁶), TikTok is primarily used to view recommended content. Interactions with content are recorded by the algorithm, such as what content a user spends more time on, searches for, or likes, to continually personalise a user's feed. Again, recommended content is prioritised to show content most likely to be engaged with, as each engagement creates data further used to shape recommendations and can be used for advertising.

This makes sense on the surface level; the more a piece of content seems to be popular, the more likely it is that other people would be interested in seeing it. However, "prioritising for engagement is likely to favour content that produces an emotional response and therefore may be controversial, shocking, or extreme, as people tend to be drawn to this content".⁷ This often leads to recommender feeds pushing potentially problematic content.

6 Meta. "Posts you see in For you on Instagram." Instagram Help Centre, 2025, [en-gb.facebook.com/help/instagram/775713060665535](https://www.facebook.com/help/instagram/775713060665535) (Accessed 27 May 2025).

7 Cobbe, Jennifer, and Jatinder Singh. "Regulating Recommending: Motivations, Considerations, and Principles." SSRN Electronic Journal (Jan. 2019), <https://doi.org/10.2139/ssrn.3371830>.

PUSHING PROBLEMATIC CONTENT

70% of YouTube's watch time is driven by its recommender feeds, according to YouTube's Chief Product Officer, Neal Mohan.⁸ Cobbe and Singh argue that recommender systems are the key to understanding the spread of conspiracy or harmful content online. For example, a video promoting conspiracy theories containing misinformation or disinformation in and of itself might not be an issue.⁹ Without recommender feeds, likely, the video would only be watched by a small number of people and wouldn't have other, similar content next to it. Cobbe and Singh contend that it is only potentially problematic when it "is algorithmically disseminated through recommending".¹⁰ This is because it "(a) increases its audience, potentially significantly, and (b) typically puts it alongside other, similar content" and can thus "contribute to systemic problems".¹¹ Systemic problems are not created by recommender feeds, which are social, political and economic, but Cobbe and Singh point out

8 Solsman, Joan E. "YouTube's AI Is the Puppet Master Over Most of What You Watch." CNET, 10 Jan. 2018, www.cnet.com/tech/services-and-software/youtube-ces-2018-neal-mohan.

9 Cobbe and Singh 2019, p. 2.

10 Cobbe and Singh 2019, p. 2.

11 Cobbe and Singh 2019, p. 2.

MAKING PLATFORMS ACCOUNTABLE

that “the prioritisation of engagement in recommending is key to exacerbating those issues online”.¹²

While it is “unlikely that algorithms alone are to blame for the radicalisation of a previously ‘moderate audience’ on YouTube” with research suggesting “these radicalised audiences existed all along”,¹³ various studies show that YouTube will promote more extremist content when users interact with far-right content, creating a self-reinforcing cycle.¹⁴

Whittaker and others find that extreme content is ranked higher than moderate content, leading users who interacted with far-right content to be shown progressively more extreme content.¹⁵

Photo: Youtube has generally been considered among the worst for extremist content on a mainstream platform, but Elon Musk’s X is now similarly criticised, while Musk himself has used his acquisition of X for clearly political purposes, nationally and globally.

12 Cobbe and Singh 2019, p. 9.

13 Matamoros-Fernández, Ariadna, and Joanne Gray. “Don’t Just Blame YouTube’s Algorithms For ‘Radicalisation’. Humans Also Play a Part.” *The Conversation*, 30 Oct. 2019, theconversation.com/dont-just-blame-youtubes-algorithms-for-radicalisation-humans-also-play-a-part-125494.

14 Whittaker, Joe, et al. “Recommender Systems and the Amplification of Extremist Content.” *Internet Policy Review*, vol. 10, no. 2 (June 2021) <https://doi.org/10.14763/2021.2.1565>.
Haroon, Muhammad, et al. “Auditing YouTube’s Recommendation System for Ideologically Congenial, Extreme, and Problematic Recommendations.” *Proceedings of the National Academy of Sciences*, vol. 120, no. 50 (Dec. 2023) <https://doi.org/10.1073/pnas.2213020120>.

15 Whittaker et al. (2021)



MAKING PLATFORMS ACCOUNTABLE

Haroon and others also find that while very right-leaning users are “recommended disproportionately more problematic channels than the other groups”, in their experiment, automated accounts representing “moderate” views also “encounter more right-leaning than moderate or left-leaning content”.¹⁶

Meanwhile, they find that very left-leaning accounts “do not encounter a growing number of very-left videos” in their recommendations.¹⁷ What these studies illustrate is that while the platform may not create the political conditions from which systemic problems arise, platform design toward prioritising engagement exacerbates those problems.

For example, in Facebook’s case in 2021, *NPR* reported that conservative American political commentator Ben Shapiro’s publications, such as “The Daily Wire, received more likes, shares and comments on Facebook than any other news publisher by a wide margin”.¹⁸ They argue that the publication garnered high engagement by using sensational headlines such as “*CNN* Medical Expert Urges We Must Make Life ‘Hard’ For Unvaccinated, Test Them Twice-Weekly” and “DeSantis Team Offers ‘Don’t Fauci My Florida’ T-Shirt, Triggers Leftists”.¹⁹ *NPR* found that the content

16 Haroon et al. 2023, p. 7.

17 Haroon et al. 2023, p. 6.

18 Parks, Miles. “Outrage as a Business Model: How Ben Shapiro Is Using Facebook to Build an Empire.” *NPR*, 19 July 2021, www.npr.org/2021/07/19/1013793067/outrage-as-a-business-model-how-ben-shapiro-is-using-facebook-to-build-an-empire.

19 Parks 2021.

EMPOWERING USERS AND CREATING SAFETY

itself was highly biased toward right-wing ideology and relied on cherry-picking facts from other publications, often outright lifting its content with very little original reporting. *The Markup*, in its own investigation, further found that the *Daily Wire* had been using Facebook's ad targeting tools to further target its content. Therefore, people who had never interacted with the publication were being recommended its articles. *The Markup* found that the *Daily Wire* "largely chose to target people whom Facebook had pegged as interested in Fox News, Donald Trump, Rush Limbaugh, and other conservative mainstays, as well as individuals Facebook determined were characteristically or demographically similar to The Daily Wire's existing audience members".²⁰ This is done by using Facebook's "lookalike" audience targeting tool, which targets Facebook users who "share similar characteristics to your existing customers".²¹ Tripodi said of the technique that the "[*Daily Wire*] is using the same tactics that [...] corporate entities are using but to create siloed interests around information".²²

Similarly, shortly after the 2020 presidential election, Facebook committed "to increase the weight that Facebook's algorithm gave to N.E.Q. [news

20 Faife, Corin. "How the Daily Wire Uses Facebook's Targeted Advertising to Build Its Brand." *The Markup*, 10 Aug. 2021, themarkup.org/citizen-browser/2021/08/10/how-the-daily-wire-uses-facebooks-targeted-advertising-to-build-its-brand.

21 Meta. "About Lookalike Audiences." Business Help Centre, 2025, www.facebook.com/business/help/164749007013531?id=401668390442328 (Accessed 27 May 2025).

22 Faife 2021.

MAKING PLATFORMS ACCOUNTABLE

ecosystem quality] scores to make sure authoritative news appeared more prominently”.²³ This meant that news publishers deemed authoritative and accurate would be boosted to show more prominently in newsfeeds.²⁴ This was in response to “stories from right-wing media outlets with false and misleading claims about discarded ballots, miscounted votes and skewed tallies were among the most popular news stories on the platform”.²⁵ Notably, the N.E.Q. score usually “play[s] a minor role in determining what appears on users’ feeds”, and both *The New York Times* and *Buzzfeed* reported that the company had been coming under fire from its own employees over amplifying divisive content.²⁶

The change was short-lived however, as the change was reversed in order to restore the newsfeed back to prioritising for engagement.²⁷ Facebook employees told *The New York Times* that other measures to “combat political misinformation and hate speech have been scaled back

23 Roose, Kevin, et al. “Facebook Struggles to Balance Civility and Growth.” *The New York Times*, 24 Nov. 2020, www.nytimes.com/2020/11/24/technology/facebook-election-misinformation.html.

24 Meta. “News content on Facebook.” Business Help Centre, 2025, www.facebook.com/business/help/224099772719228 (Accessed 27 May 2025).

25 Roose et al. 2020.

26 Roose et al. 2020.

Mac, Ryan, and Craig Silverman. “Plunging Morale And Self-Congratulations: Inside Facebook The Day Before The Presidential Election.” *Buzzfeed News*, 3 Nov. 2020, www.buzzfeednews.com/article/ryanmac/inside-facebook-24-hours-before-election-day.

27 Roose, Kevin. “Facebook reverses postelection algorithm changes that boosted news from authoritative sources.” *The New York Times*, 16 Dec. 2020, www.nytimes.com/2020/12/16/technology/facebook-reverses-postelection-algorithm-changes-that-boosted-news-from-authoritative-sources.html.

EMPOWERING USERS AND CREATING SAFETY

or vetoed by executives in the past, either because they hurt Facebook's usage numbers or because executives feared they would disproportionately harm right-wing publishers".²⁸

DRIVING PROBLEMATIC REVENUE MODELS

Recommender feeds are highly personalised to keep users' attention for as long as possible. This means that platforms must collect significant amounts of data to enable such personalisation. Such data is also used to offer highly personalised advertising, which funds the free platforms.

Funding otherwise free content by advertising has long been common in media. The ad-based model for journalism emerged in the US and UK in the 1800s²⁹, and by the interwar years, newspapers "derived half their income from advertising, and almost every industry and service [...] advertised extensively".³⁰ The model has long been seen as problematic, as it tends to sensationalism. However, what online platforms have brought to the fore, as famously documented by Zuboff, is "surveillance capitalism," in

28 Roose 2020.

29 Pickard, Victor. (2019), "Democracy Without Journalism?" Oxford University Press eBooks, <https://doi.org/10.1093/oso/9780190946753.001.0001>.

30 Williams, Raymond. (2014), "Advertising: the Magic System." Raymond Williams on Culture & Society: Essential Writings, edited by Jim McGuigan, SAGE Publications, pp. 57–84. <https://doi.org/10.4135/9781473914766.n4>.

MAKING PLATFORMS ACCOUNTABLE

which our “data exhaust” is excessively “extracted” to fuel personalised advertising and enable platform market concentration.³¹

PERSONALISATION AND DATA

In a literature review, Samuel and others note that the personalisation of adverts online “has been found to be concerning for some consumers” due to uncertainty about data storage and usage.³² They write that online users can find personalised advertising “intrusive” and cite public scandals like “Cambridge Analytics’ acquisition and unscrupulous use of aggregated datasets of 57 billion Facebook friendships and the harvesting and sharing the data of more than 50 million American Facebook users ... exemplify these heightened concerns”.³³

The UK’s Competition and Markets Authority (CMA) also wrote in their 2020 market study on digital advertising that consumers lack control over

31 Zuboff, Shoshana. “Big Other: Surveillance Capitalism and the Prospects of an Information Civilization.” *Journal of Information Technology*, vol. 30, no. 1 (Mar. 2015), pp. 75–89., p. 79. <https://doi.org/10.1057/jit.2015.5>.

32 Samuel, Anthony, et al. “Programmatic Advertising: An Exegesis of Consumer Concerns.” *Computers in Human Behavior*, vol. 116 (Dec. 2020), p. 3. <https://doi.org/10.1016/j.chb.2020.106657>.

33 Anthony et al. 2020, p. 3.
Harris, John. “The Cambridge Analytica Saga Is a Scandal of Facebook’s Own Making.” *The Guardian*, 24 Oct. 2018, www.theguardian.com/commentisfree/2018/mar/21/cambridge-analytica-facebook-data-users-profit.

EMPOWERING USERS AND CREATING SAFETY

their data.³⁴ Particularly regarding Meta, they write that consumers face a “take it or leave it” decision to hand over their data in exchange for access to the platform.³⁵ This business model is currently being contested in the EU under the European Digital Markets Act (DMA).³⁶

Social media platforms are able to not only access on-platform data but also combine it with cross-web tracking. For example, the Facebook/Meta Pixel is a piece of code added to any website to track user interactions after they engage with a Facebook or Instagram ad and can also be used to build custom audiences for ad targeting campaigns.³⁷ TikTok also has a pixel for similar functions.³⁸

Privacy advocates have pointed out that the digital ecosystem places an absurd expectation on users to manage and control their data, despite the difficulty of reading and understanding privacy policies, as well as more

34 Competition and Markets Authority. “Online platforms and digital advertising: Market study final report.” gov.uk, 1 July 2020, p. 149, assets.publishing.service.gov.uk/media/5fa557668fa8f5788db46efc/Final_report_Digital_ALT_TEXT.pdf (Accessed 27 May 2025).

35 Competition and Markets Authority 2020, p. 14.

36 European Commission. Commission finds Apple and Meta in breach of the Digital Markets Act. 23 Apr. 2025, ec.europa.eu/commission/presscorner/detail/en/ip_25_1085 (Accessed 27 May 2025).

37 Meta. “Meta Pixel: Get Started.” Developers, 2025, developers.facebook.com/docs/meta-pixel/get-started (Accessed 27 May 2025).

38 TikTok For Business. “About TikTok Pixel.” TikTok Business Help Center, 2025, ads.tiktok.com/help/article/tiktok-pixel (Accessed 27 May 2025).

MAKING PLATFORMS ACCOUNTABLE

opaque tracking mechanisms such as the above-mentioned Pixels.³⁹ The World Economic Forum has called consent, in its current form, an “illusion”.⁴⁰ Meanwhile, platforms are incentivised to collect as much data on users as possible to drive advertising revenue.

MARKET DOMINANCE IN ADVERTISING

Due to both on-platform data collection and the ability to track across the web, as well as the dominance of their platforms as an important access point, Google and Meta both comprise the global advertising duopoly, with other players like Amazon, TikTok, and Microsoft biting at their heels.⁴¹

39 Park, Claire. “How ‘Notice And Consent’ Fails to Protect Our Privacy.” New America, 23 Mar. 2020, www.newamerica.org/oti/blog/how-notice-and-consent-fails-to-protect-our-privacy (Accessed 27 May 2025).

Ruhaak, Anouk. “When One Affects Many: The Case for Collective Consent.” Mozilla Foundation, 13 Feb. 2020, www.mozillafoundation.org/en/blog/when-one-affects-many-case-collective-consent (Accessed 27 May 2025).

40 Flanagan, Anne Josephine, et al. “Redesigning Data Privacy: Reimagining Notice and Consent for human technology interaction.” World Economic Forum, 30 July 2020, www.weforum.org/publications/redesigning-data-privacy-reimagining-notice-consent-for-humantechnology-interaction (Accessed 27 May 2025).

41 Dixon, Stacy Jo. Most popular social networks worldwide as of February 2025, by number of monthly active users. Statista, 26 Mar. 2025, www.statista.com/statistics/272014/global-social-networks-ranked-by-number-of-users . Bianchi, Tiago. Search engine traffic market share of Google in the United Kingdom (UK) from January 2018 to January 2025. Statista, 29 Jan. 2025, www.statista.com/statistics/279797/market-share-held-by-google-in-the-united-kingdom-uk/ .

Bianchi, Tiago. Advertising revenue of Google from 2001 to 2024. Statista, 5 Feb. 2025, www.statista.com/statistics/266249/advertising-revenue-of-google .

Dixon, Stacy Jo. Meta Platforms - statistics and facts. Statista, 4 Feb. 2025,

EMPOWERING USERS AND CREATING SAFETY

Google is the most dominant due to its significant lead in paid search result ads on Google Search and display advertising, which are adverts displayed across the open web, such as banner ads on a website.⁴² However, Facebook is considered to be “the most important social media platform for marketers worldwide, with 44 percent of respondents highlighting its significance. Additionally, for business-to-consumer (B2C) marketers, Facebook was the most widely used platform, with 91 percent reporting its use for marketing purposes”.⁴³ In the UK, digital advertising is the most popular advertising method overall, “outperforming spending on TV, radio, and all other traditional media formats by a landslide”.⁴⁴ Search advertising has “remained the top digital ad format in the UK and many

www.statista.com/topics/9038/meta-platforms/#topicOverview .

Fuchs, Christian. (2018) “The Google and Facebook Online Advertising Duopoly.” The Online Advertising Tax as the Foundation of a Public Service Internet: A CAMRI Extended Policy Report, University of Westminster Press, pp. 11–19. www.jstor.org/stable/j.ctv5vddk0.5.

Haggin, Patience. “Google and Meta’s Advertising Dominance Fades as TikTok, Streamers Emerge.” Wall Street Journal, 4 Jan. 2023, www.wsj.com/articles/google-and-metas-advertising-dominance-fades-as-tiktok-netflix-emerge-11672711107.

Flynn, Kerry. “Global ad market to surpass \$1 trillion for first time.” Axios, 9 Dec. 2024, www.axios.com/2024/12/09/ad-revenue-growth-2024 (Accessed 27 May 2025).

Statista Research Department. Companies with largest share of digital advertising revenue worldwide in 2023. Statista, 3 Dec. 2024, www.statista.com/statistics/290629/digital-ad-revenue-share-of-major-ad-selling-companies-worldwide.

Bianchi, Tiago. Market share of leading desktop search engines worldwide from January 2015 to March 2025. 28 Apr. 2025, www.statista.com/statistics/216573/worldwide-market-share-of-search-engines.

42 Bianchi 2025, (Advertising revenue of Google from 2001 to 2024).

43 Dixon 2025, (Meta Platforms - statistics and facts).

44 Statista Research Department. Digital advertising expenditure in the United Kingdom (UK) from 2008 to 2024. Statista, 19 May 2025, www.statista.com/statistics/265267/digital-advertising-revenue-in-the-uk.

MAKING PLATFORMS ACCOUNTABLE

other regional markets,” but last year, “video-on-demand (VoD) ad spending had the highest growth rate among digital ad formats in the United Kingdom”.⁴⁵ Statista also reports that in 2024, “TikTok and social media ranked among the top three leading consumer trends according to marketers surveyed around the globe, making such channels unavoidable for most advertising strategies”.⁴⁶

What this picture reveals is the dominance of digital advertising, the unavoidable nature of advertising through social media and search, and the fact that it is dominated by two companies, with newer contenders like TikTok slowly gaining market power. The consequences of such market power mean that dominant platforms are able to siphon off ad revenue away from publishers and dictate the entire media ecosystem.⁴⁷

Photo: Mark Zuckerberg’s Meta dominates online advertising revenues, alongside Google.

45 <https://www.statista.com/statistics/265267/digital-advertising-revenue-in-the-uk/>
Statista Research Department. Change in digital advertising spending in the United Kingdom (UK) from 2024 to 2026, by format/medium. Statista, 7 May 2025,
www.statista.com/statistics/565635/digital-ad-spend-growth-rate-by-format-uk.

46 Statista. Social Media Advertising – Worldwide. 2025,
www.statista.com/outlook/amo/advertising/social-media-advertising/worldwide.

47 Witherow, Tom. “Half of UK Advertising Spend Went to Google and Meta Last Year.” The Times, 5 May 2025, www.thetimes.com/uk/technology-uk/article/half-of-uk-advertising-spend-went-to-google-and-meta-last-year-vx7lvnh5x.



MAKING PLATFORMS ACCOUNTABLE

CHANGING THE RULES FOR CONTENT CREATORS

Cobbe and Singh write that:

platforms not only amplify messages through algorithmic dissemination but can also influence the content being produced. Recommending's amplification effect, coupled with the consolidation of power in online platforms, works to incentivise the production of certain kinds of content.⁴⁸

Particularly when it comes to journalism, numerous examples of this power exertion are well documented. From Facebook's prioritisation of clickbait, the company's pivot to video and later, de-ranking of news content.⁴⁹ Each change skews the form and content of publications and affects the structure of those organisations, for example, by the time the "pivot to video" policy was reversed, newsrooms had been decimated and jobs lost. Caplan and boyd wrote that "the more dependent an industry

48 Cobbe and Singh 2019, p. 9.

49 Meyer, Robinson. "Why Are Upworthy Headlines Suddenly Everywhere?" The Atlantic, 9 Dec. 2013, www.theatlantic.com/technology/archive/2013/12/why-are-upworthy-headlines-suddenly-everywhere/282048.

Lapowsky, Issie. "A New Facebook Suit Makes 'Pivot to Video' Even More Myopic." WIRED, 18 Oct. 2018, www.wired.com/story/facebook-lawsuit-pivot-to-video-mistake.

Isaac, Mike, et al. "Silicon Valley Ditches News, Shaking an Unstable Industry." The New York Times, 19 Oct. 2023, www.nytimes.com/2023/10/19/technology/news-social-media-traffic.html?smid=url-share

EMPOWERING USERS AND CREATING SAFETY

becomes on one organisation [...] exerting a dominant administrative function (in this case, Facebook's News Feed algorithm), the more that organisation will be able to exert change on other organisations that rely upon them".⁵⁰ Publishers have to jump through hoops, changing their content at the whim of the platforms they rely on.

But it is far from the case that publishers alone are dependent on Facebook for disseminating content. Verwiebe and others describe how content creators, those who professionally create content for platforms, in this case on YouTube, "rely on algorithmic affordances for delivering their content to a potentially interested audience".⁵¹ They describe that recommender and ranking algorithms are "very apparent, though largely incomprehensible" for content creators, despite the fact that "it fundamentally shapes their working conditions".⁵²

Content creators rely on the platform for distribution and for income as monetisation "predominantly relies on public reach and audience interaction—both mediated by the algorithmic system".⁵³ Despite this

50 Caplan, Robyn, and Danah Boyd. "Isomorphism Through Algorithms: Institutional Dependencies in the Case of Facebook." *Big Data & Society*, vol. 5, no. 1 (Jan. 2018), p. 5. <https://doi.org/10.1177/2053951718757253>.

51 Verwiebe, Roland, et al. "The Algorithm Is Like a Mercurial God': Exploring Content Creators' Perception of Algorithmic Agency on YouTube." *New Media & Society* (Dec. 2024), p. 2. <https://doi.org/10.1177/14614448241307931>.

52 Verwiebe et al. 2024, p. 2.

53 Verwiebe et al. 2024, p. 2.

MAKING PLATFORMS ACCOUNTABLE

reliance on the platform for livelihood, content creators are given no transparent insight into platform changes or how algorithms for recommendation work. Verwiebe and others write that:

due to the ever-changing and complex nature of these algorithmic systems, there is limited possibility for [content creators] to know which precise factors and qualities to target, and what exact behaviour to display in order to perform efficiently within the system. Hence, they are continuously required to figure out how the algorithmic system works, what has changed, and in which ways it limits or affords visibility and success of the uploaded content.⁵⁴

To avoid content filters, “algospeak” is commonly used by content creators, whereby users of social media platforms censor words to avoid their content being demoted. For example, “sex, for example, might be replaced by an innocuous word like ‘mascara.’ ‘Unalive’ has become an agreed-upon way to refer to death or suicide. ‘Accountant’ takes the place of sex worker. ‘Corn’ stands in for porn. ‘Leg booty’ is LGBTQ”.⁵⁵

⁵⁴ Verwiebe et al. 2024, pp. 2-3.

⁵⁵ Kreuz, Roger J. “What Is ‘Algospeak’? Inside the Newest Version of Linguistic Subterfuge.” *The Conversation*, 13 Apr. 2023, theconversation.com/what-is-algospeak-inside-the-newest-version-of-linguistic-subterfuge-203460.

EMPOWERING USERS AND CREATING SAFETY

Often, content moderation disproportionately affects marginalised communities.⁵⁶ While this is partly indicative of the difficulty of content moderation on large-scale platforms that require automated tools, discussion of which is outside the remit of this report,⁵⁷⁵⁸ the power of dominant platforms shapes the content posted; they are far from neutral intermediaries. Beyond simple avoidance of specific content, content creators exist in the same space as other publishers; it is sensible to tailor content production so that it succeeds and provides an income, by learning what succeeds, further pushing content producers towards problematic content production, especially where this is cheap to provide.⁵⁹⁶⁰

Lastly, we have developers. Third-party developers create apps and integrations for platforms, adding significant value. Some third-party apps utilise Facebook integration tools to allow a user to share content created

-
- 56 Ohlheiser, A. W. "Welcome to TikTok's Endless Cycle of Censorship and Mistakes." MIT Technology Review, 13 July 2021, www.technologyreview.com/2021/07/13/1028401/tiktok-censorship-mistakes-glitches-apologies-endless-cycle.
 - 57 Narayanan, Arvind, and Sayash Kapoor. (2024) *AI Snake Oil: What Artificial Intelligence Can Do, What It Can't, and How to Tell the Difference*. Princeton UP.
 - 58 See also Kayyali, D. and Keenan, B. (2025) *Key Aspects of Moderation* in "How to Fix the Online Safety Act: A Rights First Approach". Open Rights Group. <https://www.openrightsgroup.org/publications/how-to-fix-the-online-safety-act-a-rights-first-approach/>
 - 59 Diaz Ruiz, C. (2023). Disinformation on digital media platforms: A market-shaping approach. *New Media & Society*, 27(4), 2188-2211. <https://doi.org/10.1177/14614448231207644> (Original work published 2025)
 - 60 Nicole Immorlica, Meena Jagadeesan, and Brendan Lucier. 2024. Clickbait vs. Quality: How Engagement-Based Optimization Shapes the Content Landscape in Online Platforms. In *Proceedings of the ACM Web Conference 2024 (WWW '24)*. Association for Computing Machinery, New York, NY, USA, 36–45. <https://doi.org/10.1145/3589334.3645353>

MAKING PLATFORMS ACCOUNTABLE

on their app back to Facebook, while others might deploy the “Sign in with Facebook” login to share data back to Facebook and allow for easy user sign-up for their app. Other apps might be further integrated with Facebook, such as gaming apps offered on the platform, for example, the popular Facebook game FarmVille.⁶¹

In theory, relationships between third parties and social media platforms are mutually beneficial. Former director of product for Zynga, the developer of FarmVille, said of their relationship with Facebook in 2009:

They opened up their platform for app developers like Zynga in such a way that we could create a mostly symbiotic relationship [...]. Facebook gave Zynga access to a large engaged audience, while Zynga gave users of Facebook more to do on the platform.⁶²

In addition, more integrations with Facebook give Facebook more access to user data, which again can be monetised through advertising.

However, there exists a power asymmetry between third-party developers and the large incumbents they depend on. Tools like Application Programming Interfaces (APIs), which are “interface[s] of a computer

61 Baines, Callum. “FarmVille at 15: How a Cutesy Facebook Game Shaped the Modern Internet.” The Guardian, 5 July 2024, www.theguardian.com/games/article/2024/jul/05/farmville-at-15-how-a-cutesy-facebook-game-shaped-the-modern-internet.

62 Baines 2024.

EMPOWERING USERS AND CREATING SAFETY

program that allows the software to ‘speak’ with other software”, are fundamental to building platforms and connecting to complementary apps.⁶³ Since APIs are controlled by the incumbent, they are able to decide what developers are allowed to do with an API, or can shut down APIs, sometimes without warning, destroying the viability of the developer’s app. Therefore:

APIs may not only represent information asymmetries, meaning developers and business partners seek to access the vast audience and data pools of platforms, but power asymmetries as well. While ‘third-party developers often bring a platform’s service into a more imaginative and engaging light, and in doing so often enhance the ecology of a platform’s success’ any openness that was initially encouraged ‘often tends to eventually be shut down once a platform has achieved relative dominance’.⁶⁴

The CMA’s market study similarly comes to the conclusion that third-party developers receiving access to Facebook’s developer platform are reliant

63 Lomborg, Stine, and Anja Bechmann. “Using APIs for Data Collection on Social Media.” *The Information Society*, vol. 30, no. 4 (July 2014) pp. 256–65., p. 256.
<https://doi.org/10.1080/01972243.2014.915276>.

64 Kirkwood, Megan. Interoperability and the DMA in Action: Developers Experiences of Data Portability API Access. MyData, 11 Nov. 2024, p. 13,
mydata.org/wp-content/uploads/2024/11/Interoperability-and-the-DMA-in-Action-Developers-Experiences-of-Data-Portability-API-Access.pdf.

MAKING PLATFORMS ACCOUNTABLE

on its services to promote user growth. As discussed below, in some circumstances Facebook may have the ability and incentive to exclude third-party services.⁶⁵ The CMA discusses examples where Meta deprecated APIs due to a competitive threat. Meta's "Find Friends" API allows an app to access a user's Facebook friends to build faster network effects, and "Publish Actions", an API that shares content to Facebook, allowing for easier cross-posting.⁶⁶

For example, Facebook cut off the Find Friends API for the video-sharing app Vine, due to an 'ongoing feud between Facebook and Twitter,' the latter owning Vine. Facebook made clear at the time that "apps that are using Facebook to either replicate our functionality or bootstrap their growth in a way that creates little value for people on Facebook" would not be supported by the platform.⁶⁷

We can see therefore that there are a number of different content creators who rely on platforms for dissemination, monetisation, and the ability to scale up a user base. Platforms maintain massive control over these content creators and can dictate the form and content of what they can share. The

65 Competition and Markets Authority 2020, (Online platforms and digital advertising: Market study final report), p. 139.

66 Competition and Markets Authority 2020, (Online platforms and digital advertising: Market study final report), pp. 140-141.

67 Kirkwood, Megan. "Can Data Portability Shift Power in Europe's Digital Ecosystem?" Tech Policy Press, 12 Mar. 2025, www.techpolicy.press/can-data-portability-shift-power-in-europes-digital-ecosystem.

EMPOWERING USERS AND CREATING SAFETY

power imbalance is asymmetrical as the incumbent holds all the power over the creator, despite the recognition that platforms need content creators to make their platforms valuable.

NO ESCAPE: THE RELATIONSHIP OF MONOPOLY TO THE ATTENTION MARKET

Once the platform reaches critical mass, its users, content creators and advertisers find themselves dependent, or 'locked in'. Users face high switching costs as they cannot recreate their network on another platform, content creators depend on platforms to disseminate and monetise their content, and advertisers rely on platforms to reach customers. Switching costs are even higher when platforms create an ecosystem of bundled services that users come to rely on (consider Facebook, Facebook Marketplace, and Messenger as an example). Busch and others see platform power as creating:

a collective action problem resulting from the difficulty for users to coordinate migration to a new platform (Crémer and others 2019: 22; Peitz 2020: 30). Even if the users would benefit collectively if they all migrated to competing platform, they would not necessarily have an individual

MAKING PLATFORMS ACCOUNTABLE

incentive to migrate. Their decision to stay or move to a new platform may depend on their expectation that other users will migrate as well. Shapiro and Varian refer to this as the problem of ‘collective switching costs’, i.e. the combined switching costs of all users (Shapiro & Varian 1999: 184). A new market entrant has to overcome this barrier in order to reach a critical mass of users. Therefore, control over a large user base maybe be one of the greatest assets of a digital platform.⁶⁸

Lowering the switching costs, therefore, could make it easier for users to leave a platform and give them more choice. By rebalancing the digital ecosystem, the power asymmetries could be reshuffled. If users can more easily switch, content creators can also use different platforms to produce and disseminate content, raising their bargaining power. Incumbent platforms would no longer be the necessary intermediary for advertisers, who could use different platforms to reach end users, also raising their bargaining power and reducing their dependencies on a duopoly. We explore how this might be achieved in the next chapter.

68 Busch, Christoph, et al. “Uncovering blindspots in the policy debate on platform power.” Expert Group for the EU Observatory on the Online Platform Economy: Final Reports, European Commission, 26 Feb. 2021, p. 8, digital-strategy.ec.europa.eu/en/library/expert-group-eu-observatory-online-platform-economy-final-reports.

THE DISRUPTIVE POWER OF INTEROPERABILITY

If the market is broken, and users are in an abusive relationship with their ‘free’ platform providers, we need to ask what can be done. In this section, we argue that interoperability could be the tool we need to reset the relationship between users and platforms.

Interoperability is not in the interests of established, profitable and unthreatened digital businesses. As a result, it requires government and regulatory interventions, as we are seeing in Europe. This will threaten excessive profits, and does cause anxieties in trade discussions. We are already seeing pushback from the US regarding EU attempts to open up Google, Apple and others, to allow other companies to gain access to ‘their’ customers.

In this section, we cover the basics of interoperability, including what it delivers for users, why it needs to be mandated, and the different kinds of interoperability that can be required, being “horizontal”, or across open markets, like email, or mobile phone networks, and “vertical”, being within

MAKING PLATFORMS ACCOUNTABLE

a company's own systems, like App stores, or content prioritisation engines.

MANDATING INTEROPERABILITY

As we noted in the last section, there are significant barriers to users being able to switch platforms, and exercise their choice to leave. The costs of leaving being, high, they choose to stay, resulting in the platform having little pressure to change its behaviour.

For this reason, policy makers can seek to lower switching costs by legally mandating interoperability, for example targeting Meta as the largest social media incumbent. The mechanism to do this is called interoperability, which “is a technical mechanism for computing systems to work together – even if they are from competing firms”.⁶⁹

In digital ecosystems, interoperability allows data to “be transferred and interpreted across systems and applications, [which] can help improve

69 Brown, Ian. “The Technical Components of Interoperability as a Tool for Competition Regulation.” OpenForum Europe, Nov. 2020, p. 4, www.openforumeurope.org/publications/ofa-research-paper-the-technical-components-of-interoperability-as-a-tool-for-competition-regulation (Accessed 27 May 2025).

EMPOWERING USERS AND CREATING SAFETY

competition across a range of digital markets by increasing the capability of users to interact with consumers active on a different platform”.⁷⁰

If a user does not want to remain on a social media platform, for example, because of its privacy policy or content moderation rules, but doesn't want to lose access to their social network and connections, interoperability could allow that user to switch to a different platform while continuing to connect with their old network. If a barrier to a user switching social media is perceived loss of personal data generated on the platform, such as their profile, content, photos, and other relevant data, effective data portability tools can facilitate much easier switching, but this must rely on interoperable data formats.

Once mandated, interoperability can lower the barrier to entry for new alternative platforms, which have “the ability to join the platform and compete; similarly, it gives existing competitors the ability to access the platform and grow”.⁷¹ At present, social media platforms might allow some apps and integrations access to the platform, but maintain great power over them and can cut off access if they are perceived as a threat. Mandated interoperability would ban incumbent platforms from

70 Competition and Markets Authority. “Appendix W: assessment of pro-competition interventions in social media.” gov.uk, 1 July 2020, p. 1, www.gov.uk/cma-cases/online-platforms-and-digital-advertising-market-study.

71 Morton, Fiona M. Scott, et al. “Equitable Interoperability: The ‘Supertool’ of Digital Platform Governance.” Yale Journal on Regulation, vol. 40, no. 3 (2023), pp. 1015-1016, www.yalejreg.com/print/equitable-interoperability-the-supertool-of-digital-platform-governance.

MAKING PLATFORMS ACCOUNTABLE

preventing competitors from accessing the platform. Interoperability needs to be legally enforced:

because a monopolist will typically not voluntarily adopt a policy that erodes its monopoly profit. Indeed, settings where interoperability would reduce entry barriers and promote competition in the market are exactly the instances where incumbents will not want to adopt it.⁷²

Doctorow describes interoperability as the natural order of technical systems, with barriers to interoperability put in place as a choice made by platform incumbents:

You can wear any socks you want with any shoes. You can put any drink you want in any cup. And any sheet can go on your bed. As a practical matter, there's no reason that you can't run Android apps on your iOS device and vice versa. There's no reason that you can't play your Audible audiobooks on a player that Amazon hasn't blessed. There is no reason you can't exchange messages with a Facebook user from Twitter. Those are decisions, not technical impossibilities.⁷³

⁷² Morton et al. 2023, p. 1017.

⁷³ Arnao, Zander. "Cory Doctorow on Why Interoperability Would Boost Digital Competition." Chicago Policy Review, 10 Apr. 2023, www.chicagopolicyreview.org/2023/04/12/cory-

EMPOWERING USERS AND CREATING SAFETY

Understanding the lack of interoperability as a decision driven by business interests rather than because of technical barriers reveals why mandated interoperability is becoming a popular choice for competition policy around the world.⁷⁴ That said, interoperability is not a one-size-fits-all solution. It can come in varying degrees, and the potential costs and benefits should be weighed. However, it is a solution that can help to redistribute the power dynamics of the digital ecosystem.

INTEROPERABILITY WITHIN AND BETWEEN PLATFORMS

Here we explain the two types of interoperability. ("Horizontal") interoperability between services at the same level of the value chain, and ("vertical") interoperability between services at different levels of the value chain.

[doctorow-on-why-interoperability-would-boost-digital-competition](#).

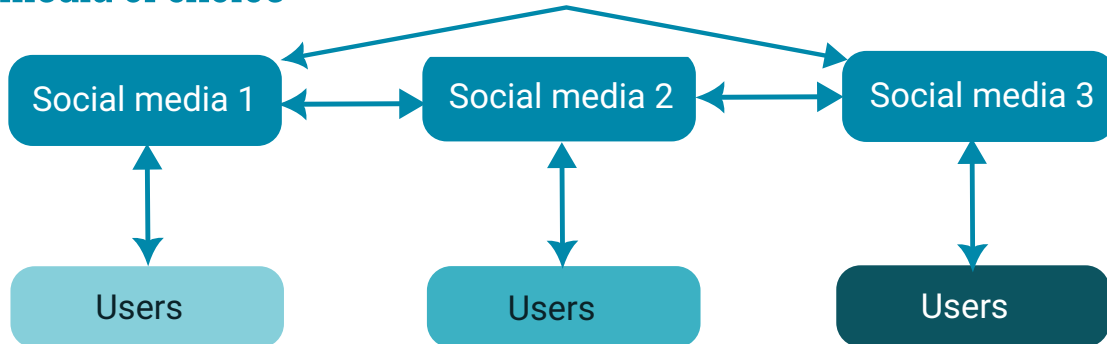
74 See: European Commission. "About the Digital Markets Act." Digital Markets Act (DMA), 2025, digital-markets-act.ec.europa.eu/about-dma_en (Accessed 27 May 2025).

Tagiaroli, Guilherme. "Justice orders Apple to accept external apps and rival payments in Brazil." UOL, 9 May 2025, www.uol.com.br/tilt/noticias/redacao/2025/05/09/apple-abrir-app-store.htm.

Japan Fair Trade Commission. Regarding the passage of the Act on Promotion of Competition for Specified Smartphone Software. 12 June 2024, www.jftc.go.jp/en/pressreleases/yearly-2024/June/240612.html.

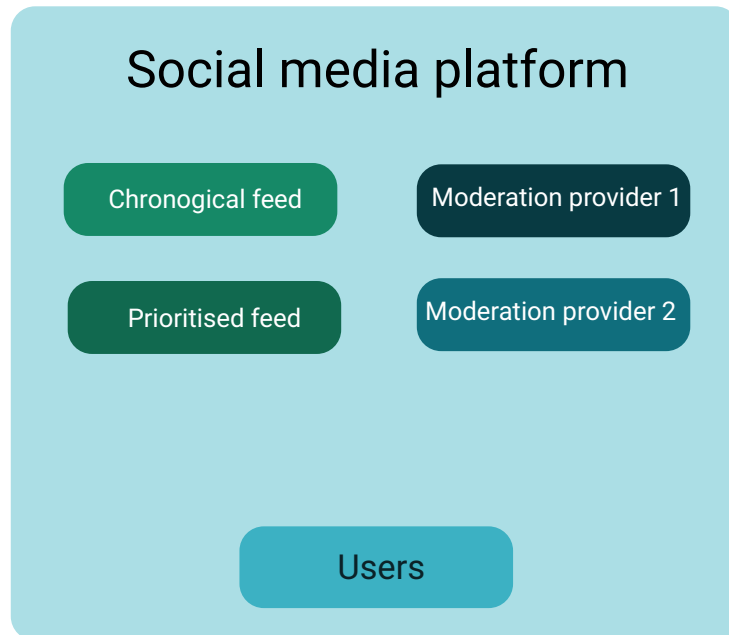
Horizontal interoperability

Users can communicate with other users through their social media of choice



Vertical interoperability

Users can choose external providers for specific services within the platform



SOCIAL SWITCHING: HORIZONTAL INTEROPERABILITY

Horizontal interoperability refers to the ability of products and services at the same level of the digital value chain to ‘work together.’ An example is the ability to send a text message from one messenger service to another. The key feature of horizontal interoperability is that it allows sharing direct network effects.⁷⁵

Horizontal interoperability allows direct communication and interaction between users on different, independent platforms. For example, different mobile networks work with each other, while phone numbers can be transferred from one network to another.

In the same way, on the Internet, regardless of what email provider you use (Gmail, Microsoft Outlook, Proton Mail, and so on), you can communicate with someone else, and it does not matter. Users are not restricted to only emailing other Gmail accounts or other Proton Mail accounts, they are horizontally interoperable. Horizontal interoperability applied to social media would allow different users of different social media networks to remain in touch, view and interact with each other’s content. It holds the

⁷⁵ Bourreau, Marc, et al. “Interoperability in Digital Markets.” Centre on Regulation in Europe, Mar. 2022, p. 7, cerre.eu/publications/interoperability-in-digital-markets (Accessed 27 May 2025).

MAKING PLATFORMS ACCOUNTABLE

power to lower switching costs if users are able to maintain their social networks. For example, the CMA has found that content interoperability, being able to see content independently of the platform:

has the potential to be the most effective model and form of interoperability intervention for overcoming network effects as consumers would no longer need to access a particular platform with a large social graph and network, such as Facebook, in order to engage with users of that platform.⁷⁶

The potential drawback of horizontal interoperability is that it could unintentionally lock in users. This is because, if users can still communicate with connections, regardless of what platform they are using, it has the potential to lower “the incentives of consumers to multi-home services, which is a powerful driver for contestability”.⁷⁷ That being said, if competing services offer better features or terms for end users, and switching is made easier, horizontal interoperability could still provide new market entrants an opportunity to share the network effects of the incumbent and grow their service to become a viable market alternative.

76 Competition and Markets Authority (2020), (Appendix W: assessment of pro-competition interventions in social media), p. 18.

77 Bourreau et al. 2022, p. 7.

“FREE THE FEEDS”: VERTICAL INTEROPERABILITY

Vertical interoperability allows services that are at different levels of the digital value chain to work together. For example, the ability to run different app stores on the same operating system, or to allow alternative identification service providers when accessing a digital service or website, depend on internal, or vertical, interoperability. The key feature of vertical interoperability is that it allows to mix-and-match system components.⁷⁸

This could also be understood as encompassing “within-platform vertical interoperability, which allows third-party developers to supply complements for a given product, service, or platform.”⁷⁹ This report has illustrated above⁸⁰ how platforms currently run APIs that allow third parties to run their own apps and services on the platform, but that platforms maintain huge control over those tools and often shut down competitive threats.

Mandated vertical interoperability could allow for new services to run on-platform, with a legal guarantee that the APIs they use cannot be simply

⁷⁸ Bourreau et al. 2022, p. 7.

⁷⁹ Bourreau et al. 2022, p. 10.

⁸⁰ See: pp. 36-39 of this report.

MAKING PLATFORMS ACCOUNTABLE

switched off. For example, Bluesky, a social media which runs on top of the ATProtocol (explained below), decouples content moderation services from hosting providers, meaning users can choose their preferred content moderation tool on their social media feed, so users can flexibly choose a service that suits their preferences of what content they want to see and what they want filtered out.⁸¹ There exist some services that allow users to filter out ads from newsfeeds on conventional social media, for example, but those regularly get shut down due to terms of use restrictions.⁸² Conversely, decentralised social networks that support interoperability allow for much more flexibility and choice not only *between* platforms but also customisation of their experience *on* the platform.

81 Kleppmann, Martin, et al. "Bluesky and the AT Protocol: Usable Decentralized Social Media." arXiv (Cornell University), Feb. 2024, <https://doi.org/10.1145/3694809.3700740>.

82 For example: Mehta, Ivan. "The OG App Promised an Ad-free Instagram Feed Then Got Pulled From App Store." TechCrunch, 27 Sept. 2022, techcrunch.com/2022/09/27/og-app-promises-you-an-ad-free-instagram-feed.

INTEROPERABILITY IS WITH US AND IT WORKS

Interoperability either exists already, or has already been mandated in a number of UK technology markets, with great success. This can give us some confidence that measures for social media interoperability can be achievable. In this chapter, we look at existing interoperability regimes that have succeeded in improving markets for customers. Some of these examples are from analogous markets, like telecoms, and others are related to the world of computing technology, including the interoperable protocols the Internet is built on. We look at Open Banking: an initiative that would be impossible without a regulator, but provides enormous value for UK banking customers. We show how government has recognised that interoperability is necessary to maintain value for money procuring its own infrastructure and making IT investment. We also discuss how social media in its earlier days often did include open connections to allow third parties to engage with them, and discuss how and why these were closed down.

TELECOMS

DE-CONCENTRATING THE MARKET

In 2005, Ofcom ruled that British Telecommunications plc (BT) had “Significant Market Power in the retail markets which include exchange line services, inland calls and low bandwidth leased lines”.⁸³ BT held a monopoly over telecoms infrastructure and service, and, as noted by Ofcom, at “varying times since 1984, the case has been made for the structural or operational separation of BT”.⁸⁴ To remedy the unbalanced market, BT was ordered to “offer services at standard published prices, terms and conditions, and is prohibited from unduly discriminating”.⁸⁵ Following a Telecommunications Strategic Review by Ofcom, in 2006, BT spun out a division called Openreach to ensure equal access to BT’s infrastructure and services.⁸⁶ However, following “a series of reviews by

83 Ofcom. “Regulation of Business Retail Markets.” www.ofcom.org.uk, 7 Sept. 2005, www.ofcom.org.uk/phones-and-broadband/telecoms-infrastructure/busretail (Accessed 27 May 2025).

84 Ofcom. Final statements on the Strategic Review of Telecommunications, and undertakings in lieu of a reference under the Enterprise Act 2002. 22 Sept. 2005, p. 4, web.archive.org/web/20180524222352/https://www.ofcom.org.uk/_data/assets/pdf_file/0021/38406/statement.pdf (Accessed 27 May 2025).

85 Ofcom 2005 (Regulation of Business Retail Markets).

86 Ofcom 2005 (Final statements on the Strategic Review of Telecommunications, and undertakings in lieu of a reference under the Enterprise Act 2002).

Ofcom. Openreach Establishment – An Overview. 21 Feb. 2006, web.archive.org/web/20160304052930/http://stakeholders.ofcom.org.uk/binaries/telecoms/

EMPOWERING USERS AND CREATING SAFETY

Ofcom, in 2017 Openreach underwent a process of reform to be incorporated as a separate company within the BT Group, rather than a business division”.⁸⁷ While still owned by the BT parent company, it is a separate company which now provides network access to more than 660 service providers.⁸⁸ Communications providers, like TalkTalk, Sky, and Vodafone, use the Openreach network to provide services to consumers. Openreach does not directly offer a communications service to consumers but maintains the infrastructure. Openreach undergoes monitoring by Ofcom for independence, for example, ensuring board decisions are not influenced by BT, with Ofcom warning that if independence does not seem to be maintained, they will order a full structural separation to take Openreach out of the BT Group.⁸⁹

The experience of the regulators with Openreach illustrates how de-concentrating the market and allowing for equal access for downstream service providers can open up an industry for new market players to compete and offers customers more choice.

[policy/bt/overview.pdf](https://www.ofcom.gov.uk/policy/bt/overview.pdf) (Accessed 27 May 2025).

87 Hutton, Georgina. “BT and Openreach.” House of Commons Library, 11 Jan. 2019, p. 1, researchbriefings.files.parliament.uk/documents/CBP-7888/CBP-7888.pdf (Accessed 27 May 2025).

88 Davenport, Emma. “What Is Openreach and How Does It Work?” Broadband Genie, 16 Apr. 2025, www.broadband.co.uk/broadband/help/what-is-openreach (Accessed 27 May 2025).

89 Hutton 2019.

MAKING PLATFORMS ACCOUNTABLE

PHONE NUMBER PORTABILITY

In the UK, telecoms are regulated by Ofcom's General Conditions of Entitlement, introduced in 2003 under the Communications Act.⁹⁰ Under this legal regime, users are able to change their service provider but keep their telephone number. To do this, customers are assigned a Porting Authorisation Code (PAC), which service providers must give upon request, which the customer gives to the new provider. Once the customer gives the new provider the PAC, they will notify the previous provider of the port request and complete the number porting within one working day.⁹¹

This allows users to move their mobile account without losing their phone number. This was only possible with regulatory action, without it, vendors had a significant hold on their customers.

The same holds true for social media. Moving social media account should not mean losing contact with friends on your previous network, but that is the cost today. For social media account portability to be just as simple as mobile switching, protocols would need to be agreed on; however as we discuss below, these do already exist and operate in some social networks.

90 Communications Act 2003 <https://www.legislation.gov.uk/ukpga/2003/21/contents>

91 Ofcom. "Switching - Mobile." Ofcom, 3 Apr. 2023, www.ofcom.org.uk/phones-and-broadband/switching-provider/switching-mobile (Accessed 27 May 2025).

EMPOWERING USERS AND CREATING SAFETY

To allow social media switching, data needs to be standardised in a similar way to how phone numbers and PACs are standardised.⁹² Currently, this would be challenging as companies organise and format their data in different ways from each other.⁹³ Meanwhile, networks built on standardised and public protocols (explored below) eliminate this problem as they are already use agreed formats for data exchange.

INTERNET PROTOCOLS

Internet protocols are the backbone of the Internet as we know it. Protocols are the rules for sharing data between devices, essentially ensuring that the information sent is structured in a pre-agreed way so that it can be read on the other end. The Internet is built on a standard protocol called TCP/IP, as explained by the editors of Encyclopaedia Britannica:

The Internet is a packet-switched network, in which information is broken down into small packets, sent individually over many different routes at the same time,

92 Hurwitz, Gus. "Portable Social Media Aren't Like Portable Phone Numbers." Tech Policy Press, 24 Oct. 2023, www.techpolicy.press/portable-social-media-arent-like-portable-phone-numbers.

93 For example, even photo data is handled differently by different companies and requires significant engineering to make them interoperable - Riley, Chris. "Data Transfer Initiative Members Apple and Google Introduce New Photo and Video Transfer Tool." Data Transfer Initiative, 10 July 2024, dtinit.org/blog/2024/07/10/DTI-members-new-photo-video-tool.

MAKING PLATFORMS ACCOUNTABLE

and then reassembled at the receiving end. TCP is the component that collects and reassembles the packets of data, while IP is responsible for making sure the packets are sent to the right destination. TCP/IP was developed in the 1970s and adopted as the protocol standard for ARPANET (the predecessor to the Internet) in 1983.⁹⁴

Without this standard, there would be no way to ensure that information can be sent over the Internet. Other standards equally work to make the Internet work, such as HTTPS (Secure Hypertext Transmission Protocol), a standard between a web browser and a web server to establish communication, meaning you can render webpages, and SMTP (Simple Mail Transfer Protocol), a protocol for exchanging emails.⁹⁵ The Internet is inherently interoperable, indeed, the function of the Internet is to connect computers to a network of networks.

94 The Editors of Encyclopaedia Britannica. "TCP/IP." Encyclopedia Britannica, 10 May 2025, www.britannica.com/technology/TCP-IP (Accessed 27 May 2025).

95 GeeksforGeeks. "What Is HTTP ?" GeeksforGeeks, 1 Apr. 2024, www.geeksforgeeks.org/what-is-http.

SOCIAL MEDIA ONCE ENCOURAGED OPENNESS

In social media, interoperability played an important role in its initial development. Looking back at Facebook's origins, one of the ways Facebook differentiated from then-popular platform MySpace, was noted by one *TechCrunch* article at the time as constituting a “polar opposite [strategy] from MySpace. While MySpace frets over third party widgets, alternatively shutting them down or acquiring them, Facebook is now opening up its core functions to all outside developers”.⁹⁶ The early Facebook of 2007 encouraged third-party developers to build apps for Facebook, recognising the value for users to be able to cross-post across various platforms, post outside content on Facebook and utilise a variety of apps.

Over the years, terms of service have led to restrictions in what apps could do, including the “non-replication principle”, a policy Facebook introduced to stop apps from developing services that compete with Facebook (though this policy was rescinded in 2018).⁹⁷ API depreciations, including functions for adding friends to new apps or automatically posting content created

⁹⁶ Arrington, Michael. “Facebook Launches Facebook Platform; They Are the Anti-MySpace.” *TechCrunch*, 24 May 2007, <https://techcrunch.com/2007/05/24/facebook-launches-facebook-platform-they-are-the-anti-myspace/>.

⁹⁷ Competition and Markets Authority. “Appendix J: Facebook Platform and API access.” gov.uk, 1 July 2020, p. 11, www.gov.uk/cma-cases/online-platforms-and-digital-advertising-market-study.

MAKING PLATFORMS ACCOUNTABLE

off-Facebook, were rolled back, citing privacy and security concerns.⁹⁸ Indeed, van der Vlist and others found that Facebook, “by limiting and restructuring API access to user and friends data [...], intended to undermine any competitors who used friend data and to reward complementors who added value to Facebook”.⁹⁹ When APIs are deprecated under the guise of privacy and security, it increasingly begs the question of whether such restrictions “constitute a thoughtful response to a legitimate security concern, or an anticompetitive act designed to repress a competitor”.¹⁰⁰

OPEN BANKING AND INTEROPERABILITY IN THE FINANCIAL SECTOR

Open Banking is the initiative created by the CMA to require the UK’s nine largest banks to cooperate in creating and implementing technical standards to open up financial services. This followed a 2014 market study by CMA, which “found barriers to entry and expansion for personal current accounts were high – competitors to existing banks found it difficult to

98 Competition and Markets Authority 2020, (Appendix J: Facebook Platform and API access), p. 14.

99 Van Der Vlist, Fernando N., et al. “API Governance: The Case of Facebook’s Evolution.” *Social Media + Society*, vol. 8, no. 2, Apr. 2022, p. 15. <https://doi.org/10.1177/20563051221086228>.

100 Riley, Chris. “Unpacking Interoperability in Competition.” *Journal of Cyber Policy*, vol. 5, no. 1 (Jan. 2020) pp. 94–106, p. 98. <https://doi.org/10.1080/23738871.2020.1740754>.

EMPOWERING USERS AND CREATING SAFETY

successfully market new products”.¹⁰¹ In addition, customers could not easily compare banks and rarely switched. To remedy the situation, the banks were forced to create an Implementation Entity to “agree, consult upon, implement, maintain and make widely available, without charge open and common banking standards’ including an open API standard, data format standards, security standards, governance arrangements, and customer redress mechanisms”.¹⁰² The “banks were also required to appoint a CMA-approved Implementation Trustee to oversee this process”.¹⁰³ This reduced the concentration of the banking sector and created opportunities for new financial services companies.

Participating firms have to be accredited by the Financial Conduct Authority. Once accredited as an Account Information Service Provider or a Payment Initiation Service Provider, the UK’s nine largest banks are required by law to comply with data requests. This removes the ability of the banks to reject data access due to privacy and security concerns, as they have been accredited.

The success of the initiative is due to mandating the biggest banks to participate, as an earlier self-regulatory initiative failed due to a lack of uptake. Additionally, the programme worked when an agreed-upon single

101 Brown, Ian. “The UK’s Midata and Open Banking programmes.” Regulation and Technology, vol. 2022, Oct. 2022, pp. 113–23, p. 114. <https://doi.org/10.71265/56y4qv61>.

102 Brown 2022 (The UK’s Midata and Open Banking programmes), p. 117.

103 Brown 2022, (The UK’s Midata and Open Banking programmes), p. 117.

MAKING PLATFORMS ACCOUNTABLE

set of standards was adopted, as this “made it much easier for competitor firms to use them, rather than having to deal with different technical standards for each of the nine regulated banks”.¹⁰⁴

The example of Open Banking has often been used as a success story in promoting data portability and interoperability. The UK government is taking this further with its Smart Data scheme, which seeks to expand Open Banking to new sectors (priority sectors include banking, financial services, and telecoms) by enabling users to port their personal and business data to authorised third parties.¹⁰⁵ Third parties must undergo accreditation, after which they are eligible for data transfer upon user authorisation.¹⁰⁶ Smart Data is likely to be introduced as secondary legislation under the Data Use and Access Act, as sector-specific legislation.¹⁰⁷

104 Brown 2022, (The UK’s Midata and Open Banking programmes), p. 123.

105 Woodhouse, John. “Data (Use and Access) Bill [HL].” House of Commons Library, 7 Feb. 2025, researchbriefings.files.parliament.uk/documents/CBP-10186/CBP-10186.pdf (Accessed 27 May 2025).

106 Woodhouse 2025.

107 Department for Business and Trade. Regulatory Powers for Smart Data. 23 Oct. 2024, bills.parliament.uk/publications/56550/documents/5223 (Accessed 27 May 2025).

Data (Use and Access) Bill [HL] <https://bills.parliament.uk/bills/3825>

GOVERNMENT USE OF INTEROPERABILITY IN PROCUREMENT

The UK government has publicly touted the benefits of interoperability and open standards in public procurement. European procurement law (Article 42 of Directive 2014/24/EU), which the UK had previously been subject to, requires that technical specifications must give suppliers equal access to government contracts, and not create obstacles for opening up public procurement to competition.¹⁰⁸ The UK government encouraged open standards in public procurement, to:

help give suppliers equal access by:

- being neutral and flexible so both open source and proprietary technology can implement them
- reducing unintentional contract lock-ins thereby increasing the diversity of technology and value for money in government contracts
- helping break down large IT contracts into smaller components that can be purchased from multiple

¹⁰⁸ Official Journal of the European Union. DIRECTIVE 2014/24/EU OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 26 February 2014 on public procurement and repealing Directive 2004/18/EC <https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:32014L0024&from=EN>

MAKING PLATFORMS ACCOUNTABLE

suppliers while keeping a consistent infrastructure or service.¹⁰⁹

They note that interoperability is important to avoid vendor lock-in and remain flexible to adopt new technology where appropriate.

However, in practice, the government has not followed its own open standards guidelines. For example, the UK Crown Commercial Service has signed a five-year contract to secure discounted access to Microsoft's portfolio of cloud software and services (365, the Azure cloud platform, Business Applications, and 365 Copilot).¹¹⁰ Meanwhile, the CMA has been investigating Microsoft Azure's strong position in the cloud computing market, preliminarily finding the company uses "its strength in software to make it harder for AWS and Google to compete effectively for customers who wish to use Microsoft software on the cloud – this reduces the competitive challenge to Microsoft in the supply of cloud services".¹¹¹ The European Commission has also been investigating the company for

109 "Open Standards principles." gov.uk, 5 Apr. 2018, www.gov.uk/government/publications/open-standards-principles/open-standards-principles (Accessed 27 May 2025).

110 Microsoft. "Microsoft and UK Government Sign Five-year Agreement, Offering Access to World-leading Value for UK Public Sector and Supporting New Era of Digital Transformation." Source EMEA, 21 Oct. 2024, news.microsoft.com/source/emea/features/microsoft-and-uk-government-sign-five-year-agreement (Accessed 27 May 2025).

111 Competition and Markets Authority "Cloud Services Market Investigation: Provisional Findings." gov.uk, 28 Jan. 2025, www.gov.uk/guidance/cloud-services-market-investigation-provisional-findings (Accessed 27 May 2025).

EMPOWERING USERS AND CREATING SAFETY

anticompetitive tying and bundling of its software services.¹¹² The government should consider whether such a provider adheres to its principles of interoperability and avoiding vendor lock-in.

The government will also need to consider whether it is wise to cement its dependency on US tech giants to provide such services amid ongoing global geopolitical uncertainty.¹¹³ The question of “digital sovereignty”, meaning avoidance of dependence on US tech and the need for interoperable systems, including independent social media, has become a matter of serious debate in Germany, France, the Netherlands and Denmark, among other European countries, as well as concern at EU level.¹¹⁴ While the UK has yet to seriously engage with the policy

112 Moens, Barbara. “EU Moves to Settle Microsoft Teams Antitrust Case.” Financial Times, 16 May 2025, www.ft.com/content/3c6548b1-97b6-4891-acae-75b776ef2cb3.

113 Pollet, Mathieu. “EU Views Break From US as ‘Unrealistic’ Amid Global Tech Race.” POLITICO, 30 Apr. 2025, www.politico.eu/article/eu-us-big-tech-companies-trade-international-digital-strategy-europe-competitiveness.

114 Henning, Maximilian. “The German state pioneering digital sovereignty.”

EURACTIV, 15 September, 2025, <https://www.euractiv.com/news/the-german-state-pioneering-digital-sovereignty/>.

The Local. “Why Denmark wants to cut use of Microsoft products at key ministry.” The Local, 10 June, 2025, <https://www.thelocal.dk/20250610/why-denmark-wants-to-cut-use-of-microsoft-products-at-key-ministry>.

Hale, Craig. “One of France’s largest cities has now also ditched Microsoft for open source software.” Tech Radar, 30 June, 2025, <https://www.techradar.com/pro/one-of-frances-largest-cities-has-now-also-ditched-microsoft-for-open-source-software>.

Desmarais, Anna. “A threat to autonomy’: Dutch parliament urges government to move away from US cloud services.” Euronews, 20 March, 2025, <https://www.euronews.com/next/2025/03/20/a-threat-to-autonomy-dutch-parliament-urges-government-to-move-away-from-us-cloud-services>.

Vaughan-Nichols, Steven. “Another European agency shifts off Big Tech, as digital sovereignty

MAKING PLATFORMS ACCOUNTABLE

implications of its dependence on the US, it is not a question that can or should be avoided. Interoperability will be key to resolving the risks, by providing, at a minimum, sufficient exit strategies should problems emerge.

movement gains steam." ZDNET, 31 October, 2025, <https://www.zdnet.com/article/another-european-agency-ditches-big-tech-as-digital-sovereignty-movement-gains-steam/>.
Haeck, Pieter. "EU-US rift triggers call for made-in-Europe tech." POLITICO, 10 March, 2025, <https://www.politico.eu/article/push-for-eurostack-as-eu-us-tech-tensions-grow/>.

EXISTING MODELS OF SOCIAL MEDIA INTEROPERABILITY

In the previous chapter, we reviewed some of the many examples of interoperability, to show how it can improve customer experience, competition and even shore up national sovereignty from the risks of over-dependence on US technology.

Two questions arise from this discussion: is social media really something that can be made interoperable? Mobile switching or email might seem naturally things that ought to be interoperable. Banking is complex, but the benefits for individuals to move their account or financial information might press government to action. Does the same apply to social media?

In this chapter, we look at the existing models of interoperability in social media, to begin to see what the benefits are today.

MAKING PLATFORMS ACCOUNTABLE

ACTIVITYPUB

ActivityPub is a protocol and open standard for decentralised social networking. It was developed in 2018 by the World Wide Web Consortium (W3C) standards organisation.¹¹⁵ Decentralised social networks are social media services not controlled by a single entity (such as Meta) but utilises “decentralised servers to share posts in a standardised format and enables users to use client apps to receive that information from the relevant servers”.¹¹⁶

Decentralised social networks choose a protocol with which to collaborate. In the case of ActivityPub, this varies from open source projects like Mastodon, through services like Flipboard, to Meta’s Threads.net, with many other commercial and non-commercial services also sharing content, likes and comments, between their users.

Mastodon, the most popular open source microblogging software, shares content using the ActivityPub protocol. Anyone can run a server or

115 Social Web Working Group. “ActivityPub.” W3C Recommendation, 23 Jan. 2018, www.w3.org/TR/activitypub.

116 Guinness, Harry. “How ActivityPub Is Setting the Stage to Weave All Your Social Media Feeds Together.” Popular Science, 12 July 2023, www.popsoci.com/technology/activitypub-Fediverse (Accessed 27 May 2025).

EMPOWERING USERS AND CREATING SAFETY

“instance”, and many are owned and moderated by their own communities, usually funded through crowdfunding.

In principle, this is no different to companies running their own email server, or from different mobile networks allowing calls and SMS to move seamlessly from caller to caller.

ActivityPub is a standard that allows developers to build social networks and has become central to the Fediverse, the name given to the network of decentralised social media networks such as Mastodon, Pixelfed, and PeerTube. Pierce explains the concept and significance of decentralised social networking for *The Verge*.

to decentralise social networking is to completely separate the user interface from the underlying data. Any time you sign up for a new social app, you won't have to rebuild your audience or re-find all your friends; your whole following and followers list come with you. Those things should be part of the Internet, not part of an app. [...] Different apps would have different strengths and weaknesses, different moderation policies and creator tools, but you'd have the same set of followers and follow the same accounts no matter which platform you use. There would be no such thing as “Facebook friends” and “Twitter followers.” The

MAKING PLATFORMS ACCOUNTABLE

social graph and the product market would split completely.¹¹⁷

Thus ActivityPub acts as an example of horizontal interoperability and hugely lowers the switching costs for users. The goal of the Fediverse is to have a network of federated apps that users can switch between as they please.

For many users and developers, this has been accompanied by a belief that they can create a safe environment for minority groups that are poorly served by Twitter/X. Many of the initial users were from the LGBT+ community, for example.¹¹⁸ While the architecture of the network is standardised on the ActivityPub protocol, apps can differentiate by features, content moderation, or audience aim, while users retain the ability to reach a wide network of people.

117 Pierce, David. "Can ActivityPub Save the Internet?" The Verge, 20 Apr. 2023, www.theverge.com/2023/4/20/23689570/activitypub-protocol-standard-social-network.

118 Tosch, Emma & Garcia, Luis & Li, Cynthia & Martens, Chris. (2024). Privacy Policies on the Fediverse: A Case Study of Mastodon Instances. Proceedings on Privacy Enhancing Technologies. 2024. 700-733. <https://doi.org/10.56553/popets-2024-0138>.

For you



docrichard46 reposted 2h ago

**greenpeaceuk** 8h

BREAKING: The UN's human rights chief has said the government's ban on Palestine Action is "at ODDS with international law" and limits the freedoms of UK citizens.

The UN chief also noted that the ban could lead to a "further chilling effect on the lawful exercise rights".

596 13 103

**moderniststates** 4h

Hello

Long shot.

The Riba library is shut (refurb)
I'm looking for a copy of the Architects
Journal, 29 July 1954
Can anyone help me?!

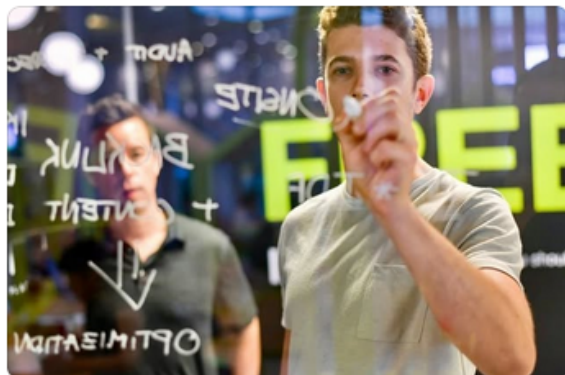
Thank you

1 1

**deptforddave** 1h

I have posted a note on linkedin, Agile, Scrum and Optimism,

[linkedin.com/pulse...](https://www.linkedin.com/pulse/)



Fediverse

**glynmoody@mastodon.social** 5h

Critically endangered angel shark filmed off Welsh coast - [theguardian.com/envir...](https://www.theguardian.com/environment/2023/jul/27/angel-shark-filmed-off-welsh-coast) "the shark is especially vulnerable to #bottomtrawling – the industrial fishing practice of dragging vast, weighted nets along the sea floor, scooping up...

**glynmoody@mastodon.social** 5h

#Israel committing #genocide in #Gaza, say Israel-based human rights groups - [theguardian.com/world...](https://www.theguardian.com/world/2023/jul/27/israel-genocide-gaza) "Reports detailing intentional targeting of Palestinians as a group, and systemic destruction of Palestinian society, add to pressure for action...

**glynmoody@mastodon.social** 10h

Mike Johnson would have 'great pause' about a Ghislaine Maxwell pardon - [theguardian.com/us-ne...](https://www.theguardian.com/us-news/2023/jul/27/mike-johnson-ghislaine-maxwell) no he wouldn't if it got trump off the hook... #trump #epstein

**glynmoody@mastodon.social** 10h

The cost of Reform UK's anti-environmental policies - [neweconomics.org/2025...](https://www.neweconomics.org/2023/jul/27/reform-uk-environment) important analysis of how destructive #reform's policies would be #climatecrisis

**glynmoody@mastodon.social** 10h

How will Israel's 'humanitarian pauses' affect Gaza's starvation crisis? - [theguardian.com/world...](https://www.theguardian.com/world/2023/jul/27/israel-gaza-starvation) not much: this is pure theatre #gazagenocide

MAKING PLATFORMS ACCOUNTABLE

Screenshot: Threads shows Fediverse posts separately, and only for users that follow Fediverse accounts.

THREADS AND MASTODON

In March 2024, Meta announced that its microblogging app, Threads, was partially interoperable with other ActivityPub servers.¹¹⁹ Users of Threads over the age of 18 with public profiles “can now choose to share their Threads posts to other ActivityPub-compliant servers”.¹²⁰

While initially only Threads content could show up on Mastodon instances that have allowed the connection, Mastodon, Flipboard and other ActivityPub content can now also be viewed and posted to Threads.¹²¹ Mastodon users can also follow and reply to Threads users.

As ActivityPub content is somewhat segregated on Threads, and only some users have opted into seeing and sharing it, Threads offers a glimpse into some of the issues with interoperability: care and attention is needed to make sure that dominant platforms do not implement “interoperability”

119 Su, Christopher, and Simon Blackstein. “Threads Has Entered the Fediverse.” Engineering at Meta, 21 Mar. 2024, engineering.fb.com/2024/03/21/networking-traffic/threads-has-entered-the-Fediverse (Accessed 27 May 2025).

120 Su and Blackstein 2024.

121 Perez, Susan (17 June 2025) “Threads expands open social web integrations with fediverse feed, user profile search”. TechCrunch <https://techcrunch.com/2025/06/17/threads-expands-open-social-web-integrations-with-fediverse-feed-user-profile-search/>

EMPOWERING USERS AND CREATING SAFETY

in such a way that their own content and platform always appears more appealing, or otherwise disadvantage competitors.

Threads entry into the Fediverse also shows some interesting dilemmas for the smaller services that might find their content shared on Threads. In short, many thought this would be unsafe, and bring their users back into contact with the kinds of abusive users that had caused them to leave Twitter and Facebook for the Fediverse.¹²²

However, others chose different routes. For example, the operators of MastodonParty and MastodonPlus servers chose not defederate from Threads, seeing the connection as a net-benefit to user privacy. Users of their servers would be following Threads users from a trusted Mastodon client, meaning those users avoid “the need to install Facebook’s proprietary Threads client or register your personal information with Threads directly”.¹²³ Indeed, being able to interact with friends who remain on more centralised platforms reduces the need to follow them to those platforms. However, it has brought up necessary discussions regarding user data privacy and to what extent Meta can or should be able benefit from the monetisation of content that originated off-platform.

122 MacAroon, Nume. #Fedipact - the Instances Blocking Zuckerberg’s Threads.net. 2025, [fedipact.veganism.social](#) (Accessed 27 May 2025).

123 Jonah. “Threads.” Fediverse Communications, 10 July 2023, [fediverse.neat.pub/2023/07/10/threads](#) (Accessed 27 May 2025).

MAKING PLATFORMS ACCOUNTABLE

In the medium term, the levels of interaction between Threads and other services is likely to depend on the quality of the interactions. If these turn out to be unproblematic, then other services are likely to allow users to share with Threads users.

The advantage for users in this arrangement is that each server has the power to moderate its own server, so individuals are able to switch between servers. Users who wish to be able to follow Threads profiles can join a server that is federated, and those who wish to avoid it, or view it as risky, can join a server that has defederated. Servers are not actually required to be federated with a platform like Threads.

The decentralised moderation model means that communities tend to be smaller and thus give users much more power over moderation choices and rules. This makes them safer digital spaces that do not need to rely on flawed automated content moderation systems, as “the relationship between those who frequent it and those who moderate it is much closer than in large and centralised commercial social networks”.¹²⁴ Additionally, safer networks can federate together and equally can defederate from servers deemed unsafe. Mastodon’s help page states that different “communities help each other by alerting others when they detect malicious behaviour from an account, or when they identify Instances run

124 Mastodon Help. mastodon.help (Accessed 27 May 2025).

EMPOWERING USERS AND CREATING SAFETY

by groups that spread hate content and intolerance, or that do not have efficient enough moderation”.¹²⁵ Thus, instances and individuals can be completely isolated if they are deemed unsafe.

On the other hand, Threads’ partial interoperability is problematic; users cannot migrate in or out of Threads as matters stand. Furthermore, Threads has made it difficult for a user to keep their followers should they ever be able to leave, as individual users must choose to allow Fediverse support. A Threads “leaver” might in fact lose contact with most of their friends, who are not sharing with the Fediverse. If Threads is to be fully interoperable, and not be designed to simply favour itself, regulatory intervention may be needed.

GROWTH OF ACTIVITYPUB

ActivityPub adoption is steadily growing. Website creator and blogging site, WordPress, has rolled out an ActivityPub plug-in, meaning that a “WordPress blog itself function[s] as a federated profile, along with profiles for each author”.¹²⁶ This means that when a blog is posted, those following the author, on Mastodon, for example, will have the blog posted to their Home feed, and those following the blog’s profile will get any updates from

¹²⁵ Mastodon Help.

¹²⁶ Automattic. “ActivityPub Plugin.” WordPress.com, 19 May 2025, wordpress.com/plugins/activitypub.

MAKING PLATFORMS ACCOUNTABLE

any of the blog's authors. This plugin works for many of the networks built on the ActivityPub protocol.

Additionally, the popular microblogging site Tumblr will be migrating its site to WordPress, after which it will also support the ActivityPub plug-in, thus connecting to the growing network of ActivityPub-based networks.¹²⁷ Other commercial services using ActivityPub include the news service FlipBoard, used by the BBC and others.¹²⁸

For other networks that support the protocol, refer to our list below.

AT PROTOCOL

AT Protocol is another “decentralised protocol for large-scale social web applications” created in 2019.¹²⁹ Bluesky, a microblogging app, is built on top of the AT Protocol. The AT Protocol, like ActivityPub, has a federated network architecture. However, the AT Protocol is intended to work differently to the ActivityPub protocol in a few significant ways, which the designers claim as improvements:

127 Perez, Sarah. “Tumblr to Join the Fediverse After WordPress Migration Completes.” TechCrunch, 11 Feb. 2025, techcrunch.com/2025/02/11/tumblr-to-join-the-fediverse-after-wordpress-migration-completes.

128 McCue, Mike (2023) “The Future of Flipboard Is Federated”. FlipBoard. <https://about.flipboard.com/fediverse/flipboard-mastodon-federated/>

129 “Protocol Overview.” AT Protocol, 2025, atproto.com/guides/overview (Accessed 27 May 2025).

EMPOWERING USERS AND CREATING SAFETY

For example, in the case of Mastodon, a user needs to choose a server when creating an account. This choice is significant because the server name becomes part of the username; migrating to another server implies changing username, and preserving one's followers during such a migration requires the cooperation of the old server. If a server is shut down without warning, accounts on that server cannot be recovered – a particular risk with volunteer-run servers. In principle, a user can host their own server, but only a small fraction of social media users have both the technical skills and the inclination to do so.¹³⁰

ATProtocol depends on a level of centralisation of its feed to achieve these claimed improvements, which has potential problems for surveillance, scraping and at-scale moderation. The designers point to issues of user experience on ActivityPub services, such as server selection,¹³¹ or unexpected service outage; users may not be able to switch servers and stand to lose their account, data, and network. Thus, the creators of the AT Protocol see centralisation (or duplication) of aspects of the protocol as a means to improve some of these pitfalls.

¹³⁰ Kleppmann et al. 2024, p. 1.

¹³¹ Mastodon Help - Instances. mastodon.help/instances/en (Accessed 27 May 2025).

MAKING PLATFORMS ACCOUNTABLE

SCALABILITY

Bluesky and the AT Protocol are built to be very public social networks, offering vast reach and scalability:

Your information, like posts and profiles, are held in Personal Data Servers (PDSes)—analogous to the hosting of a personal website. This content is then fetched by relay servers, like web crawlers, which aggregate a “firehose” of everyone’s content without much alteration. To sort and filter this on behalf of the user, like a “search engine,” AT has Appview services, which give users control over what they see. When accessing the Appview through a client app or website, the user has many options to further filter, sort, and curate their feed, as well as “subscribe” to filters and labels someone else made.¹³²

Appview is where the customisable content moderation tools or feeds customisation happens. However, just because a user might sign up to be part of one feed, a user’s posts do not stay there exclusively but are still viewable to the whole network. This ability to crawl the entirety of Bluesky means that “everything that happens on Bluesky—is technically available

132 Mir, Rory, and Ross Schulman. “What’s the Difference Between Mastodon, Bluesky, and Threads?” Electronic Frontier Foundation, 4 Nov. 2024, www.eff.org/deeplinks/2024/06/whats-difference-between-mastodon-bluesky-and-threads (Accessed 27 May 2025).

EMPOWERING USERS AND CREATING SAFETY

for independent developers. People have made monitoring tools like Firesky and visualizers by pulling from the firehose, as well as bots and other monitoring tools and services”.¹³³

However, this openness has come under fire; for example it was found that artificial intelligence researchers were scraping Bluesky to build AI models.¹³⁴ Due to the open and accessible nature of the firehose, Bluesky was unable to take much action to prevent this. Similar problems could take place should state or criminal actors seek to copy the centralised firehose.

CAN BLUESKY AND AT PROTOCOL BECOME FULLY DECENTRALISED?

Though the Bluesky app and the AT Protocol are often discussed interchangeably, Kleppmann and others say that:

Bluesky is the social app [...], while the AT Protocol is the underlying decentralized foundation. We maintain this separation because the AT Protocol is designed to support multiple social modes, not just Bluesky. For example, besides a Twitter-style microblogging app, atproto could

¹³³ Cole, Samantha. "Someone Made a Dataset of One Million Bluesky Posts for 'Machine Learning Research'" 404 Media, 27 Nov. 2024, www.404media.co/someone-made-a-dataset-of-one-million-bluesky-posts-for-machine-learning-research.

¹³⁴ Cole. 2024.

MAKING PLATFORMS ACCOUNTABLE

also be used to implement Reddit-style forums, long-form blogs with comments, or domain-specific social applications such as link sharing or book reviews. The same user identity, social graph, and user data storage servers can be shared between all of these apps.¹³⁵

The AT Protocol aims to facilitate a network of federated apps that users could use and switch interchangeably. This represents horizontal interoperability as different apps at the same level of the value chain could be used to communicate with each other. Bluesky and the AT Protocol also deliver vertical interoperability, as one of the value propositions is “to offer an open and diverse marketplace of algorithms in which communities can adapt the system to suit their needs, and users have more agency over how they spend their time and attention”.¹³⁶ Users can choose to view their feed chronologically or choose different recommendation algorithms. Users can also choose content moderation to fit their preferences.

That said, there have been criticisms of Bluesky and the AT Protocol. Despite the goal of the AT Protocol supporting a network of apps and services, it is not yet federated in the way that Mastodon is. Doctorow explains:

¹³⁵ Kleppmann et al. 2024, p. 3.

¹³⁶ Kleppmann et al. 2024, p. 3.

EMPOWERING USERS AND CREATING SAFETY

Bluesky lacks the one federated feature that is absolutely necessary for me to trust it: the ability to leave Bluesky and go to another host and continue to talk to the people I've entered into community with there. While there are many independently maintained servers that provide services to Bluesky and its users, there is only one Bluesky server. A federation of multiple servers, each a peer to the other, has been on Bluesky's roadmap for as long as I've been following it, but they haven't (yet) delivered it.

That was worrying when Bluesky was a scrappy, bootstrapped startup with a few million users. Now it has grown to over 13 million users, and it has taken on a large tranche of outside capital.¹³⁷

While on Mastodon, there are thousands of servers to choose from, and users can move server, Bluesky has long only maintained one. Doctorow's concern here is that the bigger the platform gets, the more leverage it has over its users, who will be less willing to leave even if they want to; while the incentives for Bluesky to ensure it is fully decentralised will reduce.

137 Doctorow, Cory. "Bluesky and Enshittification." Pluralistic, 2 Nov. 2024, pluralistic.net/2024/11/02/ulysses-pact/#tie-yourself-to-a-federated-mast (Accessed 27 May 2025).

MAKING PLATFORMS ACCOUNTABLE

That said, recent announcements are hopefully moving Bluesky and the “ATmosphere” in the direction toward decentralisation. Blacksky (discussed further below) has now announced its own PDS, meaning users can migrate to Blacksky servers and still interact on Bluesky.¹³⁸ This is significant and quickly became one of the biggest independent servers,¹³⁹ hopefully leading the way for more independent servers in future.¹⁴⁰ However, there are many design and governance choices behind Bluesky that may prevent it from becoming federated in the same way as Mastodon. Lemmer-Webber argues that Bluesky should instead lean in to providing a platform with a “credible exit” strategy, should the platform degrade.¹⁴¹ Lemmer-Webber points out that “perhaps a large corporation or two always have to sit at the center of Bluesky, but perhaps also it will be possible for people to leave”.¹⁴²

138 Fraser, Rudy. “Blacksky Algorithms Server Launch – Read More for Personal Invite Code.” Open Collective, 7 August 2025, <https://opencollective.com/blacksky/updates/blacksky-algorithms-server-launch-read-more-for-personal-invite-code> (Accessed 12 August 2025).

139 Bluesky handles directory - Independent PDSes. <https://blue.mackuba.eu/directory/pdses> (Accessed 12 August 2025).

140 Following the success of the Blacksky PDS, Northsky Social Cooperative, a Bluesky feed and moderation service aimed at protecting the 2SLGBTQIA+ community, announced they would soon launch their own PDS:

Northsky Social Cooperative, Bluesky, 8 August 2025, <https://bsky.app/profile/transrights.northsky.social/post/3lvu4obvv2c2c> (Accessed 12 August 2025).

141 Lemmer-Webber, Christine. “How decentralized is Bluesky really?” Dusty Cloud.org, 22 Nov. 2024, <https://dustycloud.org/blog/how-decentralized-is-bluesky/> (Accessed 12 August 2025).

142 Lemmer-Webber 2024.

EMPOWERING USERS AND CREATING SAFETY

Some critics point to the use of relays as a way that Bluesky may remain centralised. Relays “crawl[...] the network, gathering as much data as it can, and outputs it in one big stream for other services to use”.¹⁴³ However, though anyone can host a relay, it is “a fairly resource-demanding service. In all likelihood, there may be a few large full-network providers, and then a long tail of partial-network providers”, according to Bluesky documentation.¹⁴⁴ Mir and Schulman write that “users have some incentive to mostly follow the biggest relays”,¹⁴⁵ which might lead to concentration of specific networks.

Lastly, there is the question of ActivityPub and AT Protocol interoperability. While there are services like Bridgy Fed (discussed below) allowing for some cross posting between Mastodon and Bluesky, the two protocols work quite differently. Any project to make them interoperable must be thought through carefully, and to deliver many of the benefits also needs the co-operation of the protocol designers to choose lasting and user friendly solutions.

143 “Federation Architecture.” Bluesky Documentation, 2025, docs.bsky.app/docs/advanced-guides/federation-architecture (Accessed 27 May 2025).

144 Federation Architecture 2025.

145 Mir and Schulman 2024.

MAKING PLATFORMS ACCOUNTABLE

Some users have asked whether “people want to have their posts be able to be read on a completely different network with different values”.¹⁴⁶ For instance:

Everyone's Bluesky's posts (née skeets) and likes are publicly visible, and everyone can download them. This design choice might not fit well with the part of the Fediverse that wants a more privacy-focused experience. This poses a question for people: do you want your posts that are made on the Fediverse to reach Bluesky? And if not, do you want to defederate your server from the Bluesky network?¹⁴⁷

Of course, sharing between servers is a choice, so smaller communities can choose not to participate. While the different protocols offer differing advantages and disadvantages to users, the same will be true for social media businesses. While more established social media companies such as Wordpress / Tumblr and Meta have committed to ActivityPub, this may change as AT Protocol gains a large audience. It is also the case that interoperability between the two can be developed; it is not necessarily an either-or situation.

146 Hof, Laurens. “Defederation.” The Fediverse Report, 21 May 2023, fediversereport.com/defederation (Accessed 27 May 2025).

147 Hof 2023.

EMPOWERING USERS AND CREATING SAFETY

Both ActivityPub and AT Protocol show significant improvements for users and competing business, when compared with their walled garden alternatives, such as X and Facebook.

FREE OUR FEEDS

The civil society “Free our Feeds” initiative supports the AT Protocol and aims to protect it and the overall AT ecosystem from being bought or controlled by an individual or corporate actor; this is considered to be a potential problem with the current Bluesky model. The Free our Feeds campaigners explain that “it will take independent funding and governance to turn Bluesky’s underlying tech—the AT Protocol—into something more powerful than a single app. We want to create an entire ecosystem of interconnected apps and different companies that have people’s interests at heart”.¹⁴⁸ They are fundraising to help keep the Protocol funded and run independently to open “a pathway to an open and healthy social media ecosystem that any company or billionaire cannot control”.¹⁴⁹ Their goals also include making AT Protocol and ActivityPub services interoperable.

148 Free Our Feeds. freeourfeeds.com (Accessed 27 May 2025).

149 Free Our Feeds

OTHER PROTOCOLS

While ActivityPub and AT Protocol represent two of the currently most popular open protocols for decentralised social networks, they are not the only ones. Nostr (which stands for Notes and Other Stuff Transmitted by Relays) is an open protocol for decentralised end-to-end encrypted message transmission.¹⁵⁰ Social networks like Damus, a Twitter competitor, have been built on top of this protocol, along with a long list of other decentralised apps.¹⁵¹ Scuttlebutt is a peer-to-peer protocol where users host their own content and the content of the peers they follow.¹⁵² Scuttlebutt, in simple terms, is:

a decentralised system for sending messages to a specific community, rather than the global Internet. It works by word of mouth. Instead of posting to an online service like Facebook or Twitter, Scuttlebutt applications hold onto their data locally. When a user runs into a friend, the system automatically synchronises its stored updates with them

150 Nostr: A Simple Protocol for Decentralized Social Media. nostr.com (Accessed 27 May 2025).

151 Perez, Sarah. "Damus, Another Decentralized Social Networking App, Arrives to Take on Twitter." TechCrunch, 3 Feb. 2023, techcrunch.com/2023/02/01/damus-another-decentralized-social-networking-app-arrives-to-take-on-twitter.

Nostr: A Simple Protocol for Decentralized Social Media.

152 Scuttlebutt Protocol Guide. sbsc.github.io/scuttlebutt-protocol-guide.

EMPOWERING USERS AND CREATING SAFETY

via local-network transfer—or even by USB stick. Then the friend does likewise, and word spreads, slowly and deliberately.¹⁵³

This means that Scuttlebutt social networks can even be viewed offline due to the local data storage.¹⁵⁴ Access to the Scuttlebutt network is made via a variety of apps.¹⁵⁵

CONNECTING SOCIAL NETWORKS

BRIDGY FED

Bridgy Fed is an example of vertical interoperability, as it allows a user to create “a mirror of your feed” across a select number of supported networks.¹⁵⁶ Bridgy Fed:

is a decentralised social network bridge. It connects the Fediverse, the web, and Bluesky. If you’re on one of these

153 Bogost, Ian. “Meet the Nomad Who’s Exploding the Internet Into Pieces.” The Atlantic, 25 May 2017, www.theatlantic.com/technology/archive/2017/05/meet-the-counterantidisintermediationists/527553.

154 Scuttlebutt. www.scuttlebutt.nz/get-started (Accessed 27 May 2025).

155 Scuttlebutt.

156 Perez, Sarah. “Bluesky and Mastodon Users Can Now Talk to Each Other With Bridgy Fed.” TechCrunch, 6 June 2024, techcrunch.com/2024/06/05/bluesky-and-mastodon-users-can-now-talk-to-each-other-with-bridgy-fed.

MAKING PLATFORMS ACCOUNTABLE

networks, you can use Bridgy Fed to follow people on other networks, see their posts, and reply and like and repost them. Likewise, they'll be able to see you and your posts too.¹⁵⁷

Bridgy Fed is relatively new and only works on select “Fediverse servers like Mastodon, Friendica, Misskey, PeerTube, Hubzilla and others, as well as Bluesky and your own website”.¹⁵⁸ There are plans to roll this out on more Fediverse platforms.

SURF

Still in Beta mode, Surf allows users to combine “people and posts from Bluesky, Mastodon, Threads, Flipboard, YouTube and more to create an awesome custom feed”.¹⁵⁹

SILL

Sill is a newsfeed aggregator for Bluesky and Mastodon that “finds the most popular links in your Bluesky and Mastodon feeds to give you a clear picture of what’s happening”.¹⁶⁰

157 Bridgy Fed. fed.brid.gy/docs (Accessed 27 May 2025).

158 Perez 2024 (Bluesky and Mastodon Users Can Now Talk to Each Other With Bridgy Fed).

159 Surf. “Surf – Join the Surf Beta Waitlist.” Surf, 26 Feb. 2025, surf.social (Accessed 27 May 2025).

160 Sill (beta). sill.social (Accessed 27 May 2025).

CROSS POSTING

Other apps and tools currently exist to allow for cross-posting. For example, Buffer is a service that allows its users to create a post and send it to all their connected social media accounts. Currently, they offer cross-posting over Instagram, TikTok, Facebook, X (Twitter), Pinterest, LinkedIn, YouTube Shorts, Google Business Profile, and Start Page all from one simple dashboard.¹⁶¹ This service appears mostly to cater to business users who may need to manage several social accounts, schedule posts and may need analytics tools to manage content performance.¹⁶² However, there is a free version of the service that allows three social media channels to be connected.

Another cross-posting app is Croissant – Cross-Posting, which allows users to cross-post on federated social networks Threads, Bluesky, and Mastodon.¹⁶³ This is designed for individuals or small businesses.¹⁶⁴

161 Buffer. Buffer: All-you-need Social Media Toolkit for Small Businesses, 2025, buffer.com/publish (Accessed 27 May 2025).

162 Buffer. Smarter insights, better content. 2025, buffer.com/analyze?cta=bufferSite-globalNav-tools-analyze-1 (Accessed 27 May 2025).

163 Innoveghtive Inc. Croissant - Cross-Posting. App Store, 2024, apps.apple.com/us/app/croissant-cross-posting/id6670288979.

164 Perez, Sarah. "Croissant Debuts a Cross-posting App for Threads, Bluesky, and Mastodon." TechCrunch, 23 Oct. 2024, techcrunch.com/2024/10/01/croissant-debuts-a-cross-posting-app-for-threads-bluesky-and-mastodon.

MAKING PLATFORMS ACCOUNTABLE

OpenVibe allows for content interoperability. It is an app where a variety of decentralised social networks can be viewed in one timeline.¹⁶⁵ OpenVibe allows a user to see content from Mastodon, Nostr, Bluesky, and Threads in one place and allows the user to cross-post their own content across these networks.

SOCIAL GRAPH PORTING

To enable social switching, tools like Sky Follower Bridge help users to integrate their social graphs onto Bluesky. This is a browser extension, where users of X, Threads, TikTok, Facebook, and Instagram can migrate their connections to follow those same accounts on Bluesky.¹⁶⁶

WHICH PLATFORMS USE THESE PROTOCOLS?

ACTIVITYPUB

- Threads (a Meta platform)
- WordPress and Drupal blogs (via plugin)

¹⁶⁵ Openvibe — Town Square for Open Social Media. 2024, openvibe.social (Accessed 27 May 2025).

¹⁶⁶ Kawamata, Ryo. Sky Follower Bridge. 2024, www.sky-follower-bridge.dev (Accessed 27 May 2025).

EMPOWERING USERS AND CREATING SAFETY

- Pixelfed, an Instagram alternative
- PeerTube, a video streaming service similar to YouTube
- Flipboard, a news aggregator
 - (Flipboard has also integrated Bluesky into its app¹⁶⁷)
- Ghost, a commercial service similar to Substack
- Microblogging, including Mastodon and Pleroma
- Misskey
- Friendica
- Discourse, forum software
- Lemmy, a Reddit alternative

For a full list, see reference.¹⁶⁸

AT PROTOCOL

- Bluesky
 - Flashes, an Instagram alternative, run by Bluesky

¹⁶⁷ Davis, Wes. "Flipboard Is Ready to Work With Bluesky and Pixelfed." The Verge, 23 May 2023, www.theverge.com/2023/5/23/23734581/flipboard-bluesky-pixelfed-federated-networks-activitypub-at-protocol.

¹⁶⁸ "Delightful-fediverse-apps." Codeberg.org, codeberg.org/Fediverse/delightful-Fediverse-apps.

MAKING PLATFORMS ACCOUNTABLE

- o Bluescreen, a TikTok alternative, run by Bluesky
- Smoke Signal (organising group meetings and events)
- Pinksy, Instagram alternative
- Spark (originally called Reelo), a video sharing app
- WhiteWind (blogging site)

GOVERNMENT AND SOCIETY ARE FUELLING SOCIAL MEDIA MONOPOLIES

Dependence on social media monopolies is fuelled by the time, effort and money that government and society put into the very companies that we are worried about, and that government seeks to tame through content regulation. The extent of this is well known but is also a startling goal on its own.

ADVERTISING

Press Gazette recently published a report estimating that Google and Meta accounted for at least half the record £42.6bn spent on UK advertising last year.¹⁶⁹ Statista recorded that in 2024, digital advertising amounted to £35.5 billion, while total advertising spending in the UK stood at roughly £36.6

¹⁶⁹ Ponsford, Dominic. "Google and Meta's Vast Estimated UK Earnings Revealed." *Press Gazette*, 1 May 2025, [pressgazette.co.uk/marketing/google-meta-advertising-market-share](https://www.pressgazette.co.uk/marketing/google-meta-advertising-market-share).

MAKING PLATFORMS ACCOUNTABLE

billion in 2023.¹⁷⁰ In addition, the Advertising Association/WARC Expenditure Report showed that the UK's ad market recorded a 10.4% increase in investment to a total of £42.6bn in 2024, with £4 in every £5 of ad budgets now spent online.¹⁷¹ This clearly articulates the significant investment made by UK advertisers into these tech giants' platforms.

In terms of political investment into digital advertising spending, Who Targets Me, a non-profit browser extension that tracks political advertising to provide transparency to the public, recorded that during the 2024 British general election campaign:

British political parties and candidates handed £1 million a week to Meta and Google – two of the richest technology companies in the world – to target social media ads at millions of voters. By the time the polls closed, UK voters had seen over two billion digital political ads during the campaign.¹⁷²

170 Statista Research Department. (2025), (Digital advertising expenditure in the United Kingdom (UK) from 2008 to 2024).

171 "UK Advertising Records £42.6bn Spend in 2024." Advertising Association, 30 Apr. 2025, adassoc.org.uk/credos/uk-advertising-records-42-6bn-spend-in-2024 (Accessed 27 May 2025).

172 "How Labour <https://whotargets.me/en/how-labour-should-improve-digital-campaign-rules> Should Improve Digital Campaign Rules." Who Targets Me, 17 July 2024, whotargets.me/en/how-labour-should-improve-digital-campaign-rules (Accessed 27 May 2025).

EMPOWERING USERS AND CREATING SAFETY

Government-funded advertising campaigns show the extent of government investment in problematic social media. *The Independent* published a report from 2022 stating that the government had spent at least £90,000 in just three months on social media adverts deterring migrants from crossing the English Channel.¹⁷³ The UK government launched another advertising campaign on March 25, 2024, again warning potential migrants about “the consequences of entering the UK illegally”.¹⁷⁴ The press release for the campaign highlights the intent to “harness social media adverts on Facebook and YouTube to directly target people who may be considering making dangerous and illegal journeys to the UK”.¹⁷⁵ This follows previous news stories detailing how the UK Home Office had a budget of about £30,000, capped at £5,000 per person, to pay Albanian TikTok influencers to urge migrants not to cross the Channel in small boats.¹⁷⁶ While the full extent of government spending on social media is difficult to fully estimate, it is clear that the government regards these

173 Dearden, Lizzie. “Home Office Spends £90k on 3 Months of Social Media Adverts to ‘Deter’ Channel Migrants – but Numbers Rocket.” *The Independent*, 26 Sept. 2022, www.independent.co.uk/news/uk/home-news/channel-crossings-deterrence-home-office-b2174080.html.

174 Home Office, and James Cleverly. “International Social Media Campaign Launched to Stop the Boats.” GOV.UK, 25 Mar. 2024, www.gov.uk/government/news/international-social-media-campaign-launched-to-stop-the-boats (Accessed 27 May 2025).

175 Home Office 2024.

176 Osborne, Samuel. “Home Office to Pay Influencers to Post on TikTok Urging Migrants Not to Cross Channel.” *Sky News*, 14 Feb. 2024, news.sky.com/story/home-office-to-pay-influencers-to-post-on-tiktok-urging-migrants-not-to-cross-channel-13071224.

MAKING PLATFORMS ACCOUNTABLE

platforms as essential for its messaging, and heavily invests in social media advertising, especially on Google and Facebook, with targeted ads.

INVESTMENT IN SOCIAL MEDIA CONTENT

Facebook continues to be a dominant platform in the UK, holding an estimated 55% share of the market.¹⁷⁷ Facebook also holds market power when it comes to the UK public getting news, as the top platform of choice, used by 17% of users for news content.¹⁷⁸ More than 10% of the British public access news online or via social media.¹⁷⁹ YouGov reported that the British public “are by far the most likely to have used Facebook in the last 30 days, with two thirds (69%) having logged on to the platform. Most have also been on YouTube (56%) while almost half have been on Instagram (46%)”.¹⁸⁰ The Reuters Institute finds similar results.¹⁸¹ Correspondingly, Facebook

177 Dixon, Stacy Jo. Most popular social media platforms in the United Kingdom (UK) as of the third quarter 2024, by usage reach. Statista, 8 Apr. 2025, www.statista.com/statistics/284506/united-kingdom-social-network-penetration.

178 Newman, Nic. “United Kingdom.” Digital News Report 2024, Reuters Institute and the Oxford Internet Institute, 17 June 2024, reutersinstitute.politics.ox.ac.uk/digital-news-report/2024/united-kingdom (Accessed 27 May 2025).

179 Newman 2024.

180 Smith, Matthew. “How Are Britons Getting News During the 2024 General Election?” YouGov, 1 July 2024, yougov.co.uk/politics/articles/49888-how-are-britons-getting-news-during-the-2024-general-election.

181 Newman 2024.

EMPOWERING USERS AND CREATING SAFETY

remains an important vehicle for election campaigning in the UK, with Twitter/X being another important place for political messaging.¹⁸² In 2023, over 90% of MPs in the UK had active accounts on Twitter/X, following the trend of users seeking news on that platform.¹⁸³

The overall picture is one of massive concentration. Most of our time and monetary investment go into a handful of platforms, mainly Facebook. Overall, advertising is massively concentrated, with political advertising following suit. Users also spend most of their time on Facebook or an app in the Meta family.

ONLINE SAFETY ACT

Unfortunately, the immediate effect of the Online Safety Act is that it is now much harder for safe, small and interoperable services to be set up within the UK, or to service the UK market. A number of services are now blocking the UK market, because of fears of regulatory action or costs.

182 Fletcher, Richard. "Which Social Networks Did Political Parties Use Most in 2024?" UK Election Analysis, 2024, www.electionanalysis.uk/uk-election-analysis-2024/section-6-the-digital-campaign/which-social-networks-did-political-parties-use-most-in-2024 (Accessed 27 May 2025).

183 Dixon, Stacy Jo. Social media and politics in the United Kingdom (UK) - Statistics and Facts. Statista, 19 Dec. 2023, www.statista.com/topics/9885/social-media-and-politics-in-the-united-kingdom-uk/#topicOverview.

MAKING PLATFORMS ACCOUNTABLE

It is also striking that the number of services in the UK is tiny, compared to other European countries. This must in part be due to the worries that regulation has caused.

It cannot have been the aim of the Online Safety Act to close down small, safe communities, and to drive their users to rely on major platforms, where they could more easily encounter risks. Yet that is one of the more significant impacts of the Act so far.

Some of the damage could be easily repaired, however. An exemption to the Act, for small and safe websites, that know they are not prone to risks, and are not viewed as risky by Ofcom, could allow small services to be established or operate in the UK.

THE BENEFITS OF BREAKING UP SOCIAL MEDIA MONOPOLIES

While it is clear that social media interoperability already exists, and is already offering users some choice and benefits, it is also clear that major operators will not simply implement interoperability without legal requirements. For policy makers, then, the benefits need to be weighed up. Here, we come back to the problems we observed in the first chapter. Can social media interoperability reset our relationship with the giants? Our answer is a firm yes. We look at ways that interoperability can reduce incentives for circulating disinformation, reduce wrongful removal of content by at-scale moderation engines, including information produced for and by marginalised communities, and improve moderation and safety in general. We look at the current experiences of communities who are using interoperable social media in order to make their social media experiences better and safer.

MAKING PLATFORMS ACCOUNTABLE

REDUCING DISTORTION OF THE INFORMATION ENVIRONMENT

As noted earlier, because recommendation algorithms prioritise content for engagement, platforms often promote shocking or harmful content that is more likely to provoke strong reactions in users. This is further exacerbated by programs like Facebook's partner-publisher program, otherwise known as "revenue sharing programs" or "bonuses," where platforms pay for content with high views and engagement.¹⁸⁴ They have become:

a mainstay of social media monetisation offerings, now available across all major social media platforms. They are also rapidly expanding, as competition for creators intensifies. Take Facebook, for example, which has grown its partner-publisher membership to close to 3.8 million over the last few years.¹⁸⁵

This has led to the proliferation of misinformation and disinformation on platforms. Describing her social media feeds following an earthquake in

184 Meta. "Review partner-publisher lists." Business Help Centre, 2025, www.facebook.com/business/help/449365955591474?id=1769156093197771 (Accessed 27 May 2025).

185 Rio, Victoire. "Beyond Content: Why Monetization Governance Is the Next Frontier of Tech Policy." Tech Policy Press, 28 Apr. 2025, www.techpolicy.press/beyond-content-why-monetization-governance-is-the-next-frontier-of-tech-policy.

EMPOWERING USERS AND CREATING SAFETY

Myanmar, Rio describes being confronted with a deluge of AI-generated content, or images and videos purporting to be from Myanmar, despite very clearly being taken from past disasters in other countries.¹⁸⁶ She writes that, following a disaster, “searches for related content on social media spike. That boost in traffic is a gold mine for financially motivated actors, who use social media platforms’ revenue redistribution programs to convert views and engagement into money”.¹⁸⁷ This is of course just one example of how prioritising for engagement promotes harmful and misleading content. It in fact creates a marketplace for it. This is especially harmful in the context of social media being used to access the news.

Where users might switch to using a social media platform like Mastodon or Bluesky, where content might be shown chronologically, or where content moderation and algorithmic prioritisation can be customised by the user, such incentives for disinformation erode. If prioritising for engagement is taken away, and the financial incentives are removed, we can imagine a healthier media environment.

REMOVING THE CHILLING EFFECT ON MARGINALISED VOICES

When markets are concentrated, they exert enormous power over content moderation. This shapes what platform users see and can discover,

¹⁸⁶ Rio 2025.

¹⁸⁷ Rio 2025.

MAKING PLATFORMS ACCOUNTABLE

including what topics can be discussed, how it is discussed and who can contribute to discussions. This is shaped by platforms which driven by a profit motive, giving rise to problematic revenue models discussed in the first chapter and above.

Content moderation is hugely complex, not only on a technical level, particularly when discussing massive platforms like Facebook, which current estimates sit at around 3 billion active users, but deciding rules for any platform is complex.¹⁸⁸ When platforms operate across countries, they exist within different laws, cultural norms, and languages. If platform companies underinvest in content moderation for particular languages or contexts, it can have devastating effects.

The most notorious example of this is the role Facebook played in enabling the genocide of the Muslim Rohingya people in Myanmar. The Muslim minority have faced ongoing persecution since 2012, with violence escalating “in August 2017, 700,000 fled to neighbouring Bangladesh, after the army launched a brutal clearance operation against them, killing and raping thousands and burning their villages”.¹⁸⁹ At least 6,000 people were killed in just the first month of the genocide.¹⁹⁰ Much of the violence

188 Dixon 2025 (Most popular social networks worldwide as of February 2025, by number of monthly active users).

189 Head, Jonathan and BBC Burmese. “Myanmar’s Army Massacred Rohingyas. Now It Wants Their Help.” BBC News, 8 Apr. 2024, www.bbc.co.uk/news/world-asia-68730994.

190 Head and BBC Burmese 2024.

EMPOWERING USERS AND CREATING SAFETY

emanated first from hate campaigns spread using Facebook, a dominant platform in Myanmar, often referred to as the Internet itself.¹⁹¹ Hateful propaganda by the military had been allowed to spread since 2012, as explained by Rio:

Though it is difficult to tie what happened in Northern Rakhine in 2017 to individual pieces of Facebook content, the sustained campaigns waged on Facebook by both the military and Ma Ba Tha from as early as 2012 undoubtedly played a part in creating an enabling environment for the military crackdown and violence that took place. This is evidenced by the fact that the public opinion at the time was overwhelmingly supportive of the military and its use of force, which many within Myanmar saw as being justified on the basis of the narratives they had been fed for years on Facebook.¹⁹²

It was later found that Facebook “only had one single Burmese-speaking content moderator devoted to Myanmar at the time”, and research

191 De Guzman, Chad. “Meta’s Facebook Algorithms ‘Proactively’ Promoted Violence Against the Rohingya, New Amnesty International Report Asserts.” TIME, 29 Sept. 2022, time.com/6217730/myanmar-meta-rohingya-facebook.

192 Rio, Victoire. The Role of Social Media in Fomenting Violence: Myanmar. Policy Brief No. 78, Toda Peace Institute, June 2020, p. 11. toda.org/assets/files/resources/policy-briefs/t-pb-78_victoire-rio_role-of-social-media-in-fomenting-violence-myanmar.pdf (Accessed 27 May 2025).

MAKING PLATFORMS ACCOUNTABLE

conducted by Amnesty International provided “further evidence of the inadequacy of Meta’s staffing”.¹⁹³ This disaster is further exacerbated by content prioritised for engagement, meaning not only that hateful content is not taken down due to a lack of content moderation resources, but in addition, the content was amplified. Hateful content garnered more clicks and attention, so it was promoted widely, adding to the calls for genocidal violence. Amnesty International point out that when “whistle-blower Frances Haugen testified before the U.S. Congress in October 2021 on the most harmful aspects of Meta’s business practices, much of her testimony focused on Meta’s use of content shaping algorithms to proactively promote certain types of harmful content in the pursuit of profit”.¹⁹⁴

Tragedies like this are even further exacerbated considering the people of Myanmar saw Facebook as the Internet itself, and no alternatives exist. This concentrates the power that Facebook has over the speech of the country, and further acts as a conduit for the views of the military to spread to the people.

This is far from an isolated situation. Nemer authored a report, *Technology and Disinformation in the Território do Bem*, finding that the dominance of

193 Amnesty International. Myanmar: The social atrocity: Meta and the right to remedy for the Rohingya. ASA 16/5933/2022, 29 Sept. 2022, pp. 34-35.

www.amnesty.org/en/documents/ASA16/5933/2022/en (Accessed 27 May 2025).

194 Amnesty International 2022, pp. 38-39.

EMPOWERING USERS AND CREATING SAFETY

Meta is harming the information ecosystem of communities in Brazil.¹⁹⁵ He finds that:

Meta, through its platforms such as WhatsApp, Instagram, and Facebook, dominates not only access but also shapes what people believe to be true. Yet, the community is far from passive. People know when they're being misled. They know who holds the power.¹⁹⁶

Because of monopolistic deals with telecom companies, which provide access to certain apps WhatsApp and Facebook, without users incurring data usage charges, those apps are the most affordable way to access the Internet. This gives Meta the power to shape information ecosystems entirely. Yet, Nemer finds that users do not trust platforms, meaning their access to the Internet is constantly shaped by distrust, and users fall victim to “misinformation around public safety, health, and politics [which] has led residents to skip work, avoid school, or even miss medical appointments”.¹⁹⁷ Nemer argues that the lack of regulation allowing this monopolisation of information access only “protects platforms’ right to

195 Nemer, David, et al. Technology and Disinformation in the Território do Bem. Editora Milfontes, 2025, www.favela-digital.com/report (Accessed 27 May 2025).

196 Nemer, David. “Why Marginalized Areas Bear the Brunt of the Disinformation Crisis.” Tech Policy Press, 6 May 2025, www.techpolicy.press/why-marginalized-areas-bear-the-brunt-of-the-disinformation-crisis.

197 Nemer 2025.

MAKING PLATFORMS ACCOUNTABLE

profit from chaos and confusion while deflecting blame onto users who lack the resources to meaningfully resist”.¹⁹⁸

Lastly, the concentration of power by tech giants leaves users vulnerable to policy changes by the platform. For example, Meta made drastic changes to its content moderation policy in 2025, removing the company’s fact-checking program and changing its “Hateful Conduct” Community Standard.¹⁹⁹ Kayyali describes that the “policy, formerly known as the Hate Speech Community Standard, is now written to specifically allow more hateful content targeting transgender people, immigrants, and women—including cisgender women”.²⁰⁰ They write that “changes appear to cater specifically to the rise of far-right leaders and ideology globally, not just in the United States”, and they argue that Facebook, the most dominant social network in the world, has now become a more dangerous place, not only for marginalised groups but also to the safety of the general public.²⁰¹

198 Nemer 2025.

199 Catalanello, Rebecca, and Katie Sanders. “Meta is ending its third-party fact-checking partnership with US partners. Here’s how that program works.” Poynter, 7 Jan. 2025, www.poynter.org/fact-checking/2025/meta-ends-fact-checking-community-notes-facebook. Meta. “Hateful Conduct.” Transparency Centre, 2025, transparency.meta.com/en-gb/policies/community-standards/hateful-conduct (Accessed 27 May 2025).

200 Kayyali, Dia. “Meta’s Content Moderation Changes are Going to Have a Real World Impact. It’s Not Going to be Good.” Tech Policy Press, 9 Jan. 2025, www.techpolicy.press/metas-content-moderation-changes-are-going-to-have-a-real-world-impact-its-not-going-to-be-good/.

201 Kayyali 2025.

EMPOWERING USERS AND CREATING SAFETY

Interoperability addresses this question in several ways. As already noted, users can opt to choose services that perform moderation well, swiftly and in ways they appreciate. Services can be closer to their users, and understand the content more readily. It is also possible that such services would reduce the incentives for distributing disinformation, by breaking the financial benefits, and making it harder for the information to circulate so freely. Bad actors, for interoperable services, become a threat to their viability, rather than a route to profit.

PREVENTING WRONGFUL CONTENT SUPPRESSION

Centralised platforms “can more actively and pre-emptively determine which speech should be permitted and which should be suppressed, often according to their own criteria determined according to commercial considerations and incentives”.²⁰² While the centralised control over speech might leave some languages exposed to under-enforcement of content moderation, other communities face overreach of content moderation and algorithmic suppression. For example, LGBTQ+ communities have documented that content they post on platforms like

202 Cobbe, Jennifer. “Algorithmic Censorship by Social Platforms: Power and Resistance.” *Philosophy & Technology*, vol. 34, no. 4, Dec. 2021, pp. 739–66, p. 744.
<https://doi.org/10.1007/s13347-020-00429-0>.

MAKING PLATFORMS ACCOUNTABLE

YouTube is often incorrectly flagged as adult content, simply for being associated with LGBTQ+ issues.²⁰³ Generally speaking, large, centralised platforms maintain great power over what content moderation is prioritised, and hold the power over speech policies. As explored earlier in this report, content producers are also at the mercy of algorithmic prioritisation and content moderation, often censoring their speech to avoid filters and vicariously relying on platforms that hold the power to shut down their accounts or business.

As explored in the examples of interoperability, algorithmic and content moderation plurality takes away the central power of a platform and gives power back to users. For example, LGBTQ+ communities could customise their feed and moderation to suit them, avoiding speech censorship and being able to reach their community. In addition, interoperability, through lowering switching costs, gives the user the ability to leave a platform whose moderation policies they disagree with. Smaller, federated platforms run by individual servers can agree on content moderation practices, forming their own community practices, and recognising that different groups may require different content moderation policies. Smaller platforms might not need to rely as heavily on algorithmic content

203 Southerton, Clare, et al. "Restricted Modes: Social Media, Content Classification and LGBTQ Sexual Citizenship." *New Media & Society*, vol. 23, no. 5, Feb. 2020, pp. 920–38, p. 923. <https://doi.org/10.1177/1461444820904362>.

EMPOWERING USERS AND CREATING SAFETY

moderation and harmful moderation practices currently employed by bigger platforms.

USER CHOICE AND USER EXPERIENCE

Lowering switching costs gives users much more power over which platforms to spend time on, expands their choice and enhances their experience. Rather than being forced to remain on Facebook and Instagram, interoperability solutions that lower switching costs make it easier for users to leave. This introduces a competitive pressure to offer better services, which improves both choice and experience. If the market for social networks becomes less concentrated, new platforms are able to emerge to offer diversified services. However, the CMA points out that barriers to entry for alternative services are too high. While Google and Facebook:

were able to emerge, with limited resources, on the back of a good idea, producing new and innovative services [...]. We are concerned that, without reform, existing market dynamics will mean that the next great innovation cannot

MAKING PLATFORMS ACCOUNTABLE

emerge to revolutionise our lives in the way that Google and Facebook have done in the past.²⁰⁴

The CMA has described how user experience is worsened when the market is concentrated, both directly and indirectly. Direct effects include “receiving a poor-quality service, seeing too many adverts, or having to give up too much of their own personal data”.²⁰⁵ The CMA notes a 200% increase in ads on Instagram from 2016 to 2019, meaning the service has degraded user experience.²⁰⁶ The same has been documented with Google regarding Google Search, as the search experience has been purposefully degraded to keep users searching for longer in order to collect more ad revenue.²⁰⁷ Without the competitive pressure, these platforms have been allowed to degrade services due to a lack of choice, or at least perceived lack of choice by users.²⁰⁸

204 Competition and Markets Authority 2020 (Online platforms and digital advertising: Market study final report), p. 311.

205 Competition and Markets Authority 2020 (Online platforms and digital advertising: Market study final report), p. 309.

206 Competition and Markets Authority 2020 (Online platforms and digital advertising: Market study final report), p. 313.

207 Zitron, Edward. “The Man Who Killed Google Search.” Ed Zitron’s Where’s Your Ed At, 23 Apr. 2024, www.wheresyoured.at/the-men-who-killed-google (Accessed 27 May 2025).

208 For more information on this process, Cory Doctorow’s “enshittification” theory summarises the process by which “surpluses are first directed to users; then, once they’re locked in, surpluses go to suppliers; then once they’re locked in, the surplus is handed to shareholders and the platform becomes a useless pile of shit.” Doctorow, Cory. “The ‘Enshittification’ of TikTok.” WIRED, 23 Jan. 2023, www.wired.com/story/tiktok-platforms-cory-doctorow.

EMPOWERING USERS AND CREATING SAFETY

Indirect effects arise “as a result of other companies such as advertisers and newspapers being made worse off by the platforms’ market power”.²⁰⁹ They point out that the intense power that concentrated platforms have over publishers has degraded the quality of journalism. Thus, the long arm that platform power extends has wide-reaching effects.

MODERATION AND SAFETY

REDUCING HATE SPEECH: BLACKSKY

Blacksky is a feed on Bluesky that users can follow, showcasing posts by Black users on the network.²¹⁰ It launched in May 2023, and within months, it “reached millions of views and became one of the most engaged feeds on the platform”.²¹¹ It was developed by Rudy Fraser “to create a home for Black users on the network that is safe and self-governable and self-sovereign”.²¹² It operates as both a custom feed and content moderation, as Fraser explains:

209 Competition and Markets Authority 2020 (Online platforms and digital advertising: Market study final report), p. 309.

210 Fraser, Rudy. Blacksky Algorithms. www.blackskyweb.xyz (Accessed 27 May 2025).

211 Fraser. (Blacksky Algorithms).

212 Hendrix, Justin. “Podcast: Rudy Fraser on Building Blacksky and the Future of Middleware.” Tech Policy Press, 3 Mar. 2025, www.techpolicy.press/podcast-rudy-fraser-on-building-blacksky-and-the-future-of-middleware.

MAKING PLATFORMS ACCOUNTABLE

A, there's the space you can go to you can see the content of Black users. If you encounter anti-Black content or misogynoir, which is the intersection of misogyny and anti-Black harassment, anywhere on the Bluesky app, you can report that content to the Blacksky moderation service. You can choose us as your moderators and we'll take an action. You could report it to JustUs, you could report it to us and Bluesky, and we have the agency to take an action, and then we can block accounts on your behalf to a degree. And we can also label and hide content from you so that you never encounter it.²¹³

Blacksky maintains a small team of volunteer moderators, paid in donations, that can review reported content, which can be labelled and blocked from the feed and for those adopting its moderation tool. Because Blacksky "operate[s] both the feed and the mod service, we can say, hey, this user is banned from the feed. They can't see any content from Blacksky, so now they can't use the feed to interact with people".²¹⁴ This approach is very different from centralised platforms that maintain control over moderation practices. Instead, a group of people get to choose their moderation that is customised to suit their needs and means they can

²¹³ Hendrix 2025.

²¹⁴ Hendrix 2025.

EMPOWERING USERS AND CREATING SAFETY

participate in online networks with a significantly reduced level of harassment. Fraser reports the popularity of Blacksky, which at the time of writing “has been used by over a million people. It’s tens of thousands of people who post on the feed every day. 350,000 monthly active users of the feeds”.²¹⁵

Because Blacksky is built on top of the AT Protocol, the team has been able to build an independent implementation of the network:

so, if the time ever came, Blacksky users would be able to migrate their data over to our implementation, which we built from scratch and are able to continue maintaining. And so there’d be that continuity of the network. It’s called Risky, but it’s de-risking that issue with relying too much on Bluesky and their own services.²¹⁶

This means the Blacksky network can be maintained beyond just Bluesky, reducing Bluesky’s potential for concentration of power. As Blacksky is self-maintained, it is wholly independent from Bluesky but is compatible and usable there. It also means “BlackSky may run on all of its own ATProto-based infrastructure and offer its own consumer-facing client”.²¹⁷

²¹⁵ Hendrix 2025.

²¹⁶ Hendrix 2025.

²¹⁷ Perez, Sarah. “A World Without Caesars: How the ATProto Community Is Rebuilding the Web to Return Power to the People.” TechCrunch, 25 Mar. 2025, techcrunch.com/2025/03/25/a-world-without-caesars-how-the-atproto-community-is-rebuilding-the-web-to-return-power-to-the-

MAKING PLATFORMS ACCOUNTABLE

As Blacksky is now an independent company, it “provides infrastructure and tooling for communities seeking safer, self-governable online spaces”.²¹⁸

Northsky Social is “is a new cooperative that is building their own space for the trans and queer community on Bluesky/ATProto”.²¹⁹ The Northsky team states they were “inspired by the kind of work Rudy has done with Blacksky, and the contributions of various community moderators, we aim to create a space that is safe for trans people and by necessity all other groups with whom trans identity intersects”.²²⁰ These examples show that interoperable social networks and decentralised content moderation have the power to improve social networks for any group which finds that wholly centralised networks cannot provide a safe place for them.

SAFER SPACES IN MASTODON NETWORKS

HateAid, a non-profit organisation promoting human rights in online spaces, undertook a data analysis on the biggest Mastodon server, mastodon.social, to compare the “level of potentially insulting and hateful

[people](#).

218 Fraser. (Blacksky Algorithms).

219 Hof, Laurens. “Bluesky Report – #108.” The Fediverse Report, 20 Mar. 2025, fediversereport.com/bluesky-report-108 (Accessed 27 May 2025).

220 Northsky Social. Frequently Asked Questions. northskysocial.com/posts/faq (Accessed 27 May 2025).

EMPOWERING USERS AND CREATING SAFETY

content” with that found on Twitter.²²¹ They found that while on Twitter, “2.95% of the tweets examined have more than an 85% chance of containing insulting and hurtful language”, on Mastodon that drops to “just 0.44%”.²²² They recognise that Mastodon is still a much smaller platform than Twitter, but say that the federated structure gives users much more agency over content moderation. For example, HateAid points out that most social media only allows users to block individual accounts, meanwhile on Mastodon:

entire instances and therefore thousands of users can be blocked at once with just a few clicks. Instances can also do this amongst themselves. For example, some have blocked all known right-wing extremist servers in the Fediverse to protect their users from attacks from that spectrum. Projects such as “FediBlockHole” – a tool that synchronises your block list with other lists from trusted sources – can even partially automate this process.²²³

This means that hateful instances can be easily isolated, and as federated servers are much smaller, content moderation is much quicker to remove

221 HateAid. “Small Changes – Big Effect: How Hate on the Internet Can Be Reduced.” HateAid, 19 Mar. 2024, hateaid.org/en/safety-by-design-twitter-mastodon (Accessed 27 May 2025).

222 HateAid 2024.

223 HateAid 2024.

MAKING PLATFORMS ACCOUNTABLE

users from instances which violate the moderation agreement of the server.

MASTODON'S LGBTQ+ COMMUNITY

Mastodon began to be developed because of concerns of the LGBTQ+ community and others that they were badly served by the moderation policies of Twitter. The ActivityPub protocol and the user experience of Mastodon have both been developed with considerable thought towards improvising user safety. Together with a strong emphasis on active community moderation, this may help explain why Mastodon seems generally safer.

MASTODON AND PEOPLE OF COLOUR

While the above success stories are very positive, it should be noted that people of colour did not find their initial experiences on Mastodon positive during the large migration the network experienced after Musk's takeover of the platform in 2022. Some of this was due to architectural decisions, such as the lack of 'quote posting', some due to the lack of reach to the mainstream and centres of power, and some due to the self-policing culture of some users who had expectation that any 'traumatic' content such as discussions of racist behaviour or encounters be placed behind

EMPOWERING USERS AND CREATING SAFETY

content warnings.²²⁴ This experience should remind us that interoperability is not always a panacea, and experiences may be different for different people. While interoperability can tackle the question of monopoly power, and give people agency to seek solutions that suit them, it is not an answer to cultural and societal issues as a whole.

IMPROVING USER SAFETY

A wider, federated market could incentivise safety-by-design innovations, including age-appropriate interfaces and algorithmic transparency aimed at protecting younger users.

In a survey by the British Standards Institute of 1,293 young Britons, researchers found that while “[y]oung people spend a significant proportion of time online – 45% say they spend three hours or more a day on social media”,²²⁵ about half of the respondents “said they would rather be young in a world without the Internet and 27% would rather social media did not exist”.²²⁶ Recommender systems specifically were pointed to

224 Hendrix, Justin (2022) The Whiteness of Mastodon <https://www.techpolicy.press/the-whiteness-of-mastodon/>

225 British Standards Institute. “Supporting a Safe and Secure Digital World for Adolescents.” BSI, May 2025, p. 3.
www.bsigroup.com/en-GB/insights-and-media/insights/whitepapers/supporting-a-safe-and-secure-digital-world-for-adolescents (Accessed 27 May 2025).

226 British Standards Institute 2025, p. 3.

MAKING PLATFORMS ACCOUNTABLE

by Ofcom as the “main pathway to encountering harmful content online”.²²⁷ Additionally, YoungMinds and King’s College London found in a study that “[s]ocial media can generate algorithmic recommendations that can mean if a young person is in a negative cycle, social media can make things worse by recommending content that is not always positive or supportive of their mental health”.²²⁸ Thus, young people are trapped in a digital world that does not seem to serve them.

Organisations like schools or universities could create their own servers on the Fediverse, such as the example of PeerTube discussed below. The Fediverse offers to opportunity to create networks which do not use engagement-prioritised recommendation feeds. Instead, younger users could still access information, entertainment and connect with friends, identified as a draw toward social media use for young people, but instead could be shown content chronologically or customised to suit their interests.²²⁹ As we have seen with the example of Bluesky, federated networks could offer custom content moderation services for children, with automatic filtering of harmful content, and easier flagging tools if

227 Ofcom. New Rules for a Safer Generation of Children Online. 24 Apr. 2025, www.ofcom.org.uk/online-safety/protecting-children/new-rules-for-a-safer-generation-of-children-online (Accessed 27 May 2025).

228 Lucy, Jaycee, and May Beth. “Young People’s Experiences of Social Media: the push and the pull.” YoungMinds, 13 Feb. 2025, www.youngminds.org.uk/professional/spotlight-stories/young-people-s-experiences-of-social-media-and-mental-health (Accessed 27 May 2025).

229 Jaycee and Beth 2025.

EMPOWERING USERS AND CREATING SAFETY

children do encounter harmful content. This is in line with Ofcom's child safety measures.²³⁰ Nevertheless, as many federated networks rely on volunteers, there are challenges especially with the most extreme content, both in detecting when it is posted (if not noticed it can remain present) and with dealing with it when it is found, as users must view the content in order to remove it. Initiatives for collaboration to find and remove content will need to evolve.²³¹

With a wider range of social networks available, users, particularly younger users, will not have to face “take it or leave it” options regarding personal data collection. Many platforms in the Fediverse do not rely on data collection for funding but are run by volunteers. Though the sustainability of those models is still being debated, it shows that surveillance capitalism is not the only model. In line with the ICO's Age Appropriate Design Code of Practice, younger users would also have little to no data collection about them when using these federated social networks.²³²

230 Ofcom 2025 (New Rules for a Safer Generation of Children Online).

231 Connected Places (October 2025) “On the coordination for better moderation systems” <https://connectedplaces.online/on-the-coordination-for-better-moderation-systems/>

232 Information Commissioner's Office. “Code Standards.” ICO, ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/childrens-information/childrens-code-guidance-and-resources/age-appropriate-design-a-code-of-practice-for-online-services/code-standards (Accessed 27 May 2025).

CASE STUDY: PEERTUBE FOR EDUCATION

PeerTube is a video-creating and sharing alternative to YouTube built on the ActivityPub protocol.²³³ It is free, open-source, and created for non-commercial purposes, funded entirely by donations. There is no advertising, and little data is collected on users. Similar to Mastodon, servers, or instances, can federate or defederate from each other, allowing users on a server to view videos across federated servers. Servers set their own moderation rules, again, similar to Mastodon.

233 Framasoft. "An alternative to Big Tech's video platforms." JoinPeerTube, joinpeertube.org (Accessed 27 May 2025).

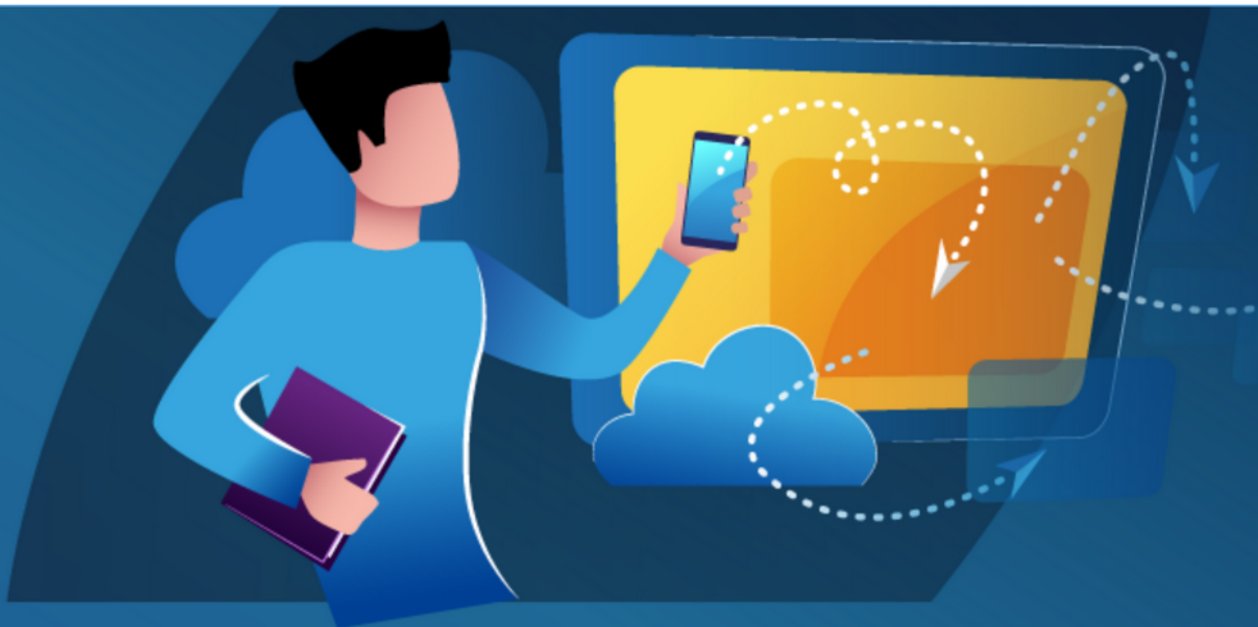


Tubes

Mot-clé, vidéo, liste de lecture ...

[Accéder](#)

[Foire aux questions](#)



Le streaming libre et responsable

répondre aux besoins de publication et de diffusion de vidéos en streaming dans un contexte
ation nationale déploie des instances Peertube thématiques fédérées entre elles permettant à
s et de partager du contenu de manière sécurisée.

MAKING PLATFORMS ACCOUNTABLE

Screenshot: The French educational streaming service, tubes.apps.education.fr

The French Ministry of National Education maintains a PeerTube server to enable educators to create channels and share content securely for educational purposes.²³⁴ As the maintainer of this server, the department has control over authorising video uploads and only allows institutional accounts to publish. They have nearly 3,000 registered users and just over 2,500 videos.²³⁵ It leverages an existing decentralised platform to enable educators to share resources in a secure environment, avoiding Youtube and other services that might pose ethical problems.

OTHER PEERTUBE USERS

Non-profits can also reduce their reliance on bigger platforms through platforms like Peertube. Privacy International, the privacy-focused human rights charity, also has a popular PeerTube server publishing videos about “excessive state and corporate surveillance issues and advice[...] on how to

234 “Tubes.” Le Streaming Libre Et Responsable, tubes.apps.education.fr (Accessed 27 May 2025).
Ministère de l’Éducation Nationale, de la Jeunesse et des Sports. “Institutionnel Éducatif.” Peertube, tube-institutionnel.apps.education.fr/about/instance/home (Accessed 27 May 2025).

235 Ministère de l’Éducation Nationale, de la Jeunesse et des Sports. “Institutionnel Éducatif.” Peertube, tube-institutionnel.apps.education.fr/about/instance/moderation (Accessed 27 May 2025).

EMPOWERING USERS AND CREATING SAFETY

increase security and freedom through better privacy”.²³⁶ A number of French and German NGOs, mainly focused on environmental or digital issues, also use Peertube for similar reasons.²³⁷

IMPROVEMENTS WITHIN PLATFORMS

The mix-and-match opportunity afforded by decentralised platforms means that young users could have content moderation, designed for children, applied to their social feeds while still being able to connect with friends or follow topics that they are interested in. Content moderation could be run by child safety experts, though they would need funding to run it, and like Blacksky, could be applicable to different decentralised platforms.

DEMANDING BETTER

Existing services like Blacksky, Mastodon and PeerTube provide potential blueprints, illustrating that decentralised content moderation and

²³⁶ Privacy International. “Privacy International Media.” Peertube, media.privacyinternational.org/videos/browse (Accessed 27 May 2025).

²³⁷ For example, Digital Courage <https://digitalcourage.video/> and La Quadrature du Net <https://video.lqdn.fr/>

MAKING PLATFORMS ACCOUNTABLE

alternatives to recommender systems prioritising for engagement can technically be done.

WHAT SOCIAL MEDIA COMPETITION COULD LOOK LIKE

The core of the interoperability argument is that it reduces market concentration and makes social switching easier for users while also lowering barriers to entry for new players. From this emerges a healthier digital ecosystem, where new networks can emerge, offering differentiated services that compete on their merits.

The present social network environment in the UK is dominated by Meta's family of apps (Facebook, Facebook Messenger, Instagram, and WhatsApp).²³⁸ The CMA, in conducting its market study, found that "[a]ll of the social media platforms we contacted as part of the study agreed that network effects are important to their services in some way".²³⁹ Network effects acted as a significant barrier to entry and expansion for alternative services, with the CMA finding that, as "a result of their less developed consumer networks, smaller competitors are unable to fulfil the same

238 Dixon 2025 (Most popular social media platforms in the United Kingdom (UK) as of the third quarter 2024, by usage reach).

239 Competition and Markets Authority 2020 (Online platforms and digital advertising: Market study final report), p. 131.

MAKING PLATFORMS ACCOUNTABLE

range of consumer needs as Facebook. Therefore, consumers' ability to switch away from its services is restricted, and Facebook experiences limited direct competition from competitors".²⁴⁰

SHARING CONTACT DATA

One suggestion to solve the problem of finding your network when you move to a new network would be to mandate the interoperability of contact data:

that enabled users to contact their existing contacts from one platform and 'invite' them to join a new platform would encourage more downloads of rival platforms, increasing multi-homing and competition. This is consistent with the Competition Law Forum's submission that basic user information and users' network, i.e. contacts, should be interoperable and that interventions should be focused on facilitating the mobility of this data. Another social media platform also told us that the ability to connect existing social media platforms to other platforms through

240 Competition and Markets Authority 2020 (Online platforms and digital advertising: Market study final report), pp. 131-132.

EMPOWERING USERS AND CREATING SAFETY

interoperable functions, such as ‘Find Contacts’, promotes competition, removes barriers to entry and helps platforms grow their userbase.²⁴¹

The ability to share network effects might help to reduce this as a barrier to entry and only require platforms to maintain fair access to “tools that make it easier for consumers to access their existing networks across multiple platforms”.²⁴² Features like “Find Contacts” exist but are often degraded or removed due to competitive pressure. This can be easily remedied by mandating large platforms to maintain such tools on fair and equitable terms, however, they must be enforced with data protection and privacy principles in mind, such as preventing personal data exposure, and that users remain in control of who receives data about them and why.

CROSS POSTING

The CMA also recommends that platforms enable cross-posting, which would mean that users can “spend more time on (and share more content from) a platform that best suits them overall, rather than a platform that

²⁴¹ Competition and Markets Authority 2020 (Appendix W: assessment of pro-competition interventions in social media), p. 8.

²⁴² Competition and Markets Authority 2020 (Appendix W: assessment of pro-competition interventions in social media), p. 9.

MAKING PLATFORMS ACCOUNTABLE

has the largest number of users”.²⁴³ This could be relatively easily remedied; Facebook used to maintain a “Publish actions” API, which allowed users to share content created on another platform to make automatic posts to their Facebook News Feed.²⁴⁴ However, the functionality was removed in August 2018 due to concerns about spamming, despite the posting being user-permissioned.²⁴⁵ While users can still share content from certain other social media networks onto Facebook, Facebook limits what can be shared from Facebook onto other platforms. The CMA has already recommended increased cross-posting across social networks.

As network effects and Facebook’s social graph are a particular switching cost for users, the ability to continue posting, and horizontal interoperability generally, may ease this issue if users are able to maintain connections across platforms. However, it is argued that this kind of horizontal interoperability should be asymmetrical to ensure incumbents don’t overly benefit at the expense of the smaller competitor.²⁴⁶ Blankertz

243 Competition and Markets Authority 2020 (Appendix W: assessment of pro-competition interventions in social media), p.12.

244 Competition and Markets Authority 2020 (Appendix W: assessment of pro-competition interventions in social media), p. 9.

245 Competition and Markets Authority 2020 (Appendix W: assessment of pro-competition interventions in social media), p. 10.

246 Blankertz, Aline, and Svea Windwehr. “Interoperability and Openness Between Different Governance Models: The Dynamics of Mastodon/Threads and Wikipedia/Google.” Digital Platform Governance, Tech Reg Chronicle (2025) pp. 44–51, p. 47. www.pymnts.com/cpi-posts/interoperability-and-openness-between-different-governance-models-the-dynamics-of-mastodon-threads-and-wikipedia-google.

EMPOWERING USERS AND CREATING SAFETY

and Windwehr point out that in the case of Mastodon and Threads, if two-way interoperability were fully introduced (or now, more widely used), Mastodon may be overwhelmed with content moderation obligations by the incoming Threads content, while Threads might get more benefit from Mastodon content coming in due to its ability to monetise.²⁴⁷

At present, posts from Mastodon appear on Threads only for users that have enabled this, and Threads posts only appear on profiles on Mastodon instances that have not de-federated from Threads. The authors, writing before Threads started hosting ActivityPub content, argued that while interoperability on the incumbent side should be mandatory, it should be optional for smaller players, which may not want to connect with the incumbent player. Even now, as discussed above, external content might be seen as occupying a “second class” position on the platform, and might require regulatory action to ensure it is fully present and accessible for all users, for example.

PLATFORM FEDERATION

Doctorow and Cyphers posit that mandating:

²⁴⁷ Blankertz and Windwehr 2025.

MAKING PLATFORMS ACCOUNTABLE

back-end interoperability [...] would require platforms to allow competitors to work with their internal systems on behalf of users whose data lives elsewhere. The core principle of the mandate would be this: any service operated by the platform that allows users to communicate with each other—whether by direct message, public or semi-public posts, comments, or reactions—should allow users that are not signed up with the service to engage in those same kinds of communication.²⁴⁸

In essence, they argue that this requires “Facebook to create new connections in two directions: first, it would need to share data from its own users with third-party services; and second, it would need to ingest data from users of those outside services”.²⁴⁹ This would turn Facebook more into a federated network, where users are able to interact with different communities from their own servers. It would go further than allowing cross-posting as it would mean allowing bi-directional data flows of comments, likes and reactions, allowing for “users of small services to interact with users on big platforms. This gets directly at the network

248 Cyphers, Bennett, and Cory Doctorow. “Privacy Without Monopoly: Data Protection and Interoperability.” Electronic Frontier Foundation, 12 Feb. 2021, www.eff.org/wp/interoperability-and-privacy (Accessed 27 May 2025).

249 Cyphers and Doctorow 2021.

effects that make it so easy for Facebook and YouTube to shrug off competition”.²⁵⁰

DATA PORTABILITY

Data portability, or data mobility, also helps to reduce switching costs. In essence, data portability allows an individual to leave a social media network and bring “their profile, content, photos, and other relevant data to a new platform rather than rebuilding their digital presence from scratch or losing valuable data”.²⁵¹ Data portability allows users to take their data away:

from a platform you no longer trust, and manage it directly, or offer it instead to a different service provider in whom you have greater trust. Competition thus emerges as the second purpose of data portability; regardless of your interest in data ownership or privacy values, if you can port your data to another service provider, you can switch services with low transactional cost.²⁵²

²⁵⁰ Cyphers and Doctorow 2021.

²⁵¹ Kirkwood 2025.

²⁵² Riley 2020, p. 96.

MAKING PLATFORMS ACCOUNTABLE

Data mobility, or the ability for users to send personal data to new services, “should also facilitate innovation because the recipient of useful data can create new products and services; this would create new competition and even new markets”.²⁵³ However, this depends on a level of data interoperability to be present, meaning that data arrives in a usable and manageable format that is easily kept up to date, such as through an API.

COMPETITIVE PRESSURE TO INNOVATE

While interoperability will likely rely on some level of standardisation, for example, ensuring that cross-posting content remains the same quality regardless of destination, concerns submitted by incumbents regarding market differentiation are likely unwarranted. The CMA notes that:

Facebook submitted that mandated interoperability or industry standards would diminish the incentive to innovate, which has driven competition between platforms and improved value for consumers and might lead to a generalised homogenisation of consumer-facing services. Twitter also noted that industry-wide interoperability requirements for social media platforms could be counter-

²⁵³ Morton et al. 2023, p. 1027.

EMPOWERING USERS AND CREATING SAFETY

productive due to the risk of disincentivising new entrants and innovation.²⁵⁴

However, the CMA counteracts this concern by pointing out that:

the specific features we have under consideration, such as words, pictures and videos, are not recently innovative and as such an intervention is unlikely to diminish incentives to innovate. Indeed, the ability to reach a wider audience should improve incentives to invest and innovate in additional services to attract new users.²⁵⁵

At present, the current incentives for incumbents to innovate are non-existent due to a complete lack of competition, which has led to a degradation in services. By mandating a level of interoperability so that new platforms might be able to access user contacts, or standardising some components to allow cross-posting, new market entrants will be able to offer differentiated services, increasing pressure to offer improved features and services. Social switching to decentralised platforms already illustrates how new players are offering innovative services in alternative content moderation and recommendation systems, improving user choice.

254 Competition and Markets Authority 2020 (Appendix W: assessment of pro-competition interventions in social media), pp. 4-5.

255 Competition and Markets Authority 2020 (Appendix W: assessment of pro-competition interventions in social media), p. 13.

MAKING PLATFORMS ACCOUNTABLE

By lowering some of the barriers to entry, we could see even more options being introduced.

BUSINESSES AND ORGANISATIONS

When the concentration of power in the digital economy is undermined, the power over the products and services that depend on platforms is reduced, giving them more leverage. This report discusses how publishers, advertisers, content creators and developers all depend on platforms in different ways and thus, interoperability and the opening of the digital platform market would affect all of them. Publishers, advertisers and content creators would not have to depend on a small handful of companies to reach end users and would be able to move platforms if their terms were deemed unfair, potentially giving them more leverage to demand better terms. They could potentially post content on select platforms that caters to their niche or could post to many platforms to reach different end users, potentially expanding their reach.

CREATOR SWITCHING COSTS

Journalists rely on social media to distribute their publications, with reportedly 55% of X (previously Twitter) users getting their news from the platform, and young journalists between the ages of 18–29 reporting that “Twitter is the social media site they use most or second most in their job”.²⁵⁶ X was a platform “for journalists to ‘find content, contact new sources and confirm facts’ (Hernández-Fuentes and Monnier 2022, 2) while also allowing journalists in non-democratic contexts to circumvent press restrictions and bypass state-sponsored censorship”.²⁵⁷ However, despite its role as:

a vital tool for news gathering, networking, and audience engagement, the platform has become increasingly controversial under its new leadership. The changes in content moderation, the rise of misinformation, and the shifting priorities of the algorithm have left journalists

256 Baftiu, Doruntina, and Tomás Dodds. “Adapting to Twitter: The Entanglement of Journalistic Values and Online Personas.” *Journalism Studies*, vol. 24, no. 10 (May 2023) pp. 1295–315, p. 1295. <https://doi.org/10.1080/1461670x.2023.2209812>.

257 Baftiu and Dodds 2023, p. 1296.

MAKING PLATFORMS ACCOUNTABLE

questioning whether they should continue using it or seek alternative platforms.²⁵⁸

Since August 2024, X “has lost 11 million European users, with the biggest exodus reported in France (2.7 million), Poland (1.8 million) and Germany (1.3 million)” in reaction to the platform changes under its new ownership.²⁵⁹ This has left publishers and independent journalists facing the dilemma of having to move over to new platforms, despite the significant time and resources required to build a following online. Federated social media on the other hand can protect against future switching costs as content can be viewed across the Fediverse, independent of which service a user chooses, and with means for users or publishers to switch and move their content to a new platform, should they wish, while retaining their networks, being able to move the connections, both those they follow and their followers.

258 FOREIGN PRESS USA. To Leave or Not to Leave? The Dilemma of Journalists on X (Formerly Twitter). 2 Feb. 2025, foreignpress.org/journalism-resources/to-leave-or-not-to-leave-the-dilemma-of-journalists-on-x-formerly-twitter (Accessed 27 May 2025).

259 Starcevic, Seb. “Elon Musk Takes Hit as Europeans Ditch X in Drove.” POLITICO, 30 Apr. 2025, www.politico.eu/article/elon-musk-x-europe-social-media-twitter-takes-hit.

DEVELOPER INVESTMENTS ARE BETTER PROTECTED

Developers currently rely on dominant platforms for API access to reach users and risk API depreciation and alterations, sometimes without warning or justification.²⁶⁰ This can be detrimental to businesses, as explained by a developer:

Can we build a business that has full dependency on these APIs as input into our products? I don't know that we can because they can turn them off at any moment. A bit like we've been hearing for years, apps being suddenly kicked off the App Store or the Play Store, and then all of a sudden, their business is dead. In a way, there's an even worse dependency on these APIs because you can be kicked off at the Play Store or the App Store and the [European] Commission can come in and say, "Don't do that", and you get put back on. And you haven't lost anything apart from potentially some reputational damage. But with an API, you could spend millions acquiring users that connect to the API. The companies could disconnect you and the Commission could come along and say, "Reconnect them".

260 Competition and Markets Authority 2020 (Appendix J: Facebook Platform and API access).

MAKING PLATFORMS ACCOUNTABLE

That's all very well, but you've got to start again. So, there's a big vulnerability there.²⁶¹

Others observe that “[d]evelopers may also face the risk of Facebook competing with their product either presently or in the future”, putting them at risk of losing out to Facebook due to its market dominance and ability to integrate its service into its ecosystem of apps and services.²⁶² Mandated interoperability could help to protect apps and services that rely on APIs by forcing incumbents to ensure continued maintenance and fair access to APIs, with publicly accessible documentation as well as sufficient mechanisms to contact support and leave feedback. As incumbent power fades, its dependency on individual platforms would erode as developers could create apps and services on top of standardised protocols that could be used across Fediverse apps. Building on top of standards would be more resilient, less prone to anti-competitive shutdowns compared to APIs, which are created by dominant firms setting all the terms.²⁶³

²⁶¹ Kirkwood 2024, p. 30.

²⁶² Competition and Markets Authority 2020 (Appendix J: Facebook Platform and API access), p. 6.

²⁶³ Brown 2020.

BUSINESSES REDUCE DEPENDENCY ON BIG TECH

For businesses, breaking down the dependency on Facebook would remove it as an unavoidable middleman. The CMA notes that:

[A mid-sized tech company] told us that Facebook's position in social media means that its use of Facebook's marketing tools is unavoidable. It suspected that Facebook used data acquired from [mid-sized tech company] through these tools to develop [...] and compete with [mid-sized tech company's] consumer offering. [Mid-sized tech company] has unsuccessfully sought agreements that would restrict Facebook's ability to use [mid-sized tech company's] data as an input to Facebook services that compete with [mid-sized tech company].²⁶⁴

The CMA also found that Facebook's single sign-on functions and advertising services (the Facebook Pixel) give Facebook access to data on a company's user base, which could be used to build a competing service to squash the competitor.²⁶⁵ Therefore, reducing the market power of an

264 Competition and Markets Authority 2020 (Online platforms and digital advertising: Market study final report), p. 145.

265 Competition and Markets Authority 2020 (Online platforms and digital advertising: Market study final report), p. 145.

MAKING PLATFORMS ACCOUNTABLE

incumbent like Facebook would help to stop it from using anticompetitive practices to remove competition, protect business investment into developing new products and services, and level the playing field for all the different content creators that contribute to platforms.

LEGAL TOOLS FOR INTEROPERABILITY

If the case for interoperability as a way of promoting social goods, such as better interactions, better moderation and safety, as the result of more competitive social media markets can be made, then we need to understand the ways that regulators may compel interoperability measures. In this chapter, we look at the powers at the UK and EU level to see how both jurisdictions may decide to take action. Both have ex ante powers, that is to say, if they see market dominance, then they can take action to address the harms that have or are likely to emerge, without proving that damage has already taken place.

We note that processes run by regulators will be heavily lobbied, depend on technical detail, and are prone to degrees of regulatory capture. While competition authorities tend to be robust, there is a great deal at stake, and vigilance will be needed to ensure they resist external pressures, including political pressure, to reduce their actions and play safe with monopolists. We also discuss the need for UK-EU co-operation and knowledge sharing.

THE DIGITAL MARKETS, COMPETITION AND CONSUMERS ACT

On May 24, 2024, the UK's Digital Markets, Competition, and Consumers Act (DMCCA) received Royal Assent, with the regime entering enforcement on January 1, 2025.²⁶⁶ The Furman review, an independent report commissioned by the UK government titled *Unlocking digital competition, Report of the Digital Competition Expert Panel*, laid the foundation for the new regulation by suggesting the creation of a dedicated unit to enforce competition law on digital platforms.²⁶⁷ The DMCCA is an ex ante law, meaning it imposes rules which designated firms must follow, rather than ex post law, where harms must be proven in court after the fact.

The DMCCA confers legal powers to the Digital Markets Unit (DMU), a unit within the CMA. The DMU can designate firms deemed to have Strategic Market Status (SMS). These are firms that the CMA believes to have substantial and entrenched market power and a position of strategic significance that meets a quantitative threshold²⁶⁸ and provides Digital

266 Digital Markets, Competition and Consumers Act 2024 <https://bills.parliament.uk/bills/3453>

267 Digital Competition Expert Panel. "Unlocking digital competition, Report of the Digital Competition Expert Panel." gov.uk, 13 Mar. 2019, www.gov.uk/government/publications/unlocking-digital-competition-report-of-the-digital-competition-expert-panel (Accessed 27 May 2025).

268 The turnover condition is either a global turnover exceeding £25 billion or if the total value of the UK turnover of an undertaking exceeds £1 billion.

EMPOWERING USERS AND CREATING SAFETY

Activities (digital content and/or service provided over the Internet) to the UK. The CMA will conduct investigations lasting up to nine months (extendable by three months), resulting in SMS designation along with tailored conduct requirements (CRs) or Pro-Competition Interventions (PCIs).

It has similarities to the European Digital Markets Act (DMA), which is another ex ante law which entered into force on November 1, 2022 and became applicable on May 2, 2023.²⁶⁹ Under the EU regime, providers of Core Platform Services (CPS), which include social networks, app stores, advertising networks, browsers, intermediation services, operating systems, video sharing, search, and messaging services, have to notify the Commission if they meet the quantitative thresholds specified in the legislation.²⁷⁰ The Commission then assesses if the CPS is an important gateway for business users to reach end users and enjoys an entrenched and durable position, which would make the firm operating the CPS a gatekeeper.²⁷¹ The Commission will then have 45 working days to adopt a

Competition and Markets Authority. "Digital Markets Competition Regime Guidance." gov.uk, 19 Dec. 2024, www.gov.uk/government/publications/digital-markets-competition-regime-guidance (Accessed 27 May 2025).

269 Official Journal of the European Union, REGULATION (EU) 2022/1925 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 14 September 2022 on contestable and fair markets in the digital sector and amending Directives (EU) 2019/1937 and (EU) 2020/1828 (Digital Markets Act) <https://eur-lex.europa.eu/eli/reg/2022/1925/oj>.

270 See Article 3 https://eur-lex.europa.eu/eli/reg/2022/1925/oj#art_3.

271 See Article 3 https://eur-lex.europa.eu/eli/reg/2022/1925/oj#art_3.

MAKING PLATFORMS ACCOUNTABLE

decision designating a specific gatekeeper. The designated gatekeepers will have a maximum of six months after the Commission's designation decision to ensure set out in Articles 5, 6, and 7 of the DMA, otherwise described as a set of do's and don'ts.²⁷² There are currently seven gatekeepers: Alphabet, Amazon, Apple, Booking, ByteDance, Meta, and Microsoft, which comprise 23 core platform services which must adhere to the regulation.²⁷³

While the jurisdiction of the DMA is the EU, it is expected that many of the same DMA gatekeepers will be DMCCA SMS firms due to the focus of both regimes on creating fairer and more contestable digital markets and the application of both regimes only including firms with extremely high turnover thresholds. It is also likely that the CMA will take lessons from the enforcement of the DMA and apply them to the application of the DMCCA, either through UK-EU Competition Cooperation Agreement negotiations or through other consultations.²⁷⁴

However, the UK's DMCCA adopts a more flexible and tailored approach. SMS designations in relation to digital activities can encompass a variety of digital activities; for example, the first designation has been launched against Google in relation to its search and advertising business as one

²⁷² European Commission (About the Digital Markets Act).

²⁷³ European Commission. "Gatekeepers." Digital Markets Act (DMA), 2025, [digital-markets-act.ec.europa.eu/gatekeepers_en](https://act.ec.europa.eu/gatekeepers_en) (Accessed 27 May 2025).

²⁷⁴ Competition and Markets Authority 2024 (Digital Markets Competition Regime Guidance).

EMPOWERING USERS AND CREATING SAFETY

digital activity.²⁷⁵ This means its search and advertising parts of its business will be considered together, understanding Google as operating different components that work together to create dominance. There are certain criteria and assessments in the process of designating a firm as SMS and creating conduct requirements, such as a forward-looking assessment considering if the firm maintains substantial and entrenched market power and a position of strategic significance, as well as ensuring conduct requirements align with one of three objectives: fair dealing, open choices, or trust and transparency.²⁷⁶ However, there is no preset list, and the CMA will seek engagement from a variety of stakeholders when crafting these CRs and PCIs. That said, CRs and PCIs will be agreed to during the designation process, meaning SMS firms will help to create their own requirements. Therefore, outside engagement in the process will be essential to ensure the process does not become captured.

275 Competition and Markets Authority. "SMS Investigation Into Google's General Search and Search Advertising Services." GOV.UK, 25 Mar. 2025, www.gov.uk/cma-cases/sms-investigation-into-googles-general-search-and-search-advertising-services (Accessed 27 May 2025).

276 Competition and Markets Authority 2024 (Digital Markets Competition Regime Guidance).

CURRENT SMS DESIGNATION INVESTIGATIONS

The CMA originally announced in January 2025 that they would launch SMS designation investigations in relation to two areas of digital activity in January, and a third digital activity investigation launched within six months of 2025.²⁷⁷ The tailored conduct requirements will be unveiled after the designation is concluded. The first designation investigation was launched against Google in relation to general search and search advertising services.²⁷⁸ On January 23, 2025, the CMA announced simultaneous SMS investigations against Google and Apple, designating the companies' "mobile ecosystems" as a single digital activity.²⁷⁹ The mobile ecosystems investigations "will assess in parallel these firms' position in their respective 'mobile ecosystems' which include the operating systems, app stores and browsers that operate on mobile devices".²⁸⁰ The statutory deadline for Google search and advertising

277 Competition and Markets Authority. "CMA Sets Out Initial Plans as New Digital Markets Competition Regime Comes Into Force." GOV.UK, 7 Jan. 2025, www.gov.uk/government/news/cma-sets-out-initial-plans-as-new-digital-markets-competition-regime-comes-into-force (Accessed 27 May 2025).

278 Competition and Markets Authority 2025 (SMS Investigation Into Google's General Search and Search Advertising Services).

279 Competition and Markets Authority. "CMA to Investigate Apple and Google's Mobile Ecosystems." GOV.UK, 23 Jan. 2025, www.gov.uk/government/news/cma-to-investigate-apple-and-googles-mobile-ecosystems (Accessed 27 May 2025).

280 Competition and Markets Authority 2025 (CMA to Investigate Apple and Google's Mobile Ecosystems).

investigation was Monday, 13 October 2025,²⁸¹ with the CMA ultimately confirming designation.²⁸² The statutory deadline for both mobile ecosystems investigations was Wednesday, 22 October 2025,²⁸³ with the CMA also confirming both firms designations.²⁸⁴

FUTURE SMS DESIGNATION: SOCIAL MEDIA MARKET

The third designation investigation was set to be announced by the end of June (which would be within the first 6 months of this year, the deadline set by the CMA). However, the timeline has been updated, meaning a third investigation will not be launched until next year.²⁸⁵ The CMA has previously indicated it will first focus on the sectors it has already investigated, which include search advertising, mobile operating systems, browsers, and app stores, as has been announced. Another potential

281 Competition and Markets Authority 2025 (SMS Investigation Into Google's General Search and Search Advertising Services).

282 Competition and Markets Authority 10 October 2025 "CMA confirms Google has strategic market status in search services" <https://www.gov.uk/government/news/cma-confirms-google-has-strategic-market-status-in-search-services>.

283 Competition and Markets Authority 2025 (CMA to Investigate Apple and Google's Mobile Ecosystems).

284 Competition and Markets Authority 22 October 2025 "CMA confirms Apple and Google have strategic market status in mobile platforms" <https://www.gov.uk/government/news/cma-confirms-apple-and-google-have-strategic-market-status-in-mobile-platforms>.

285 Competition and Markets Authority 24 June 2025 "CMA takes first steps to improve competition in search services in the UK" <https://www.gov.uk/government/news/cma-takes-first-steps-to-improve-competition-in-search-services-in-the-uk>

MAKING PLATFORMS ACCOUNTABLE

candidate is cloud services, in which a market investigation has recommended that Amazon Web Services and Microsoft Azure be designated as SMS firms under the DMCCA.²⁸⁶

The CMA has also investigated online platforms and digital advertising, making social media a potential next or future target.²⁸⁷ It is likely that the DMCCA would be utilised over competition law, as the new regulation is seen as the more appropriate tool.

The Furman review recommended interoperability and data mobility in online platforms, with the CMA agreeing that the DMU should pursue these as CRs or PCIs.²⁸⁸ As mentioned above, the CMA has previously argued for cross-posting and sharing contacts as ways to level the playing field. If the CMA indeed launched an investigation into Meta regarding its social networks, this would provide an opportunity to dialogue with the DMU regarding interoperability measures to ensure a more contestable social media marketplace.

286 Competition and Markets Authority. "Cloud Infrastructure Services: Final Decision Report." GOV.UK, 31 July. 2025 <https://www.gov.uk/cma-cases/cloud-services-market-investigation#final-report> (Accessed 1 August 2025).

287 Competition and Markets Authority 2020 (Online platforms and digital advertising: Market study final report).

288 Competition and Markets Authority 2020 (Appendix W: assessment of pro-competition interventions in social media), p. 2.

THE OBJECTIONS, COUNTERED

If there is a dysfunctional market and a case for intervention (chapter one), models we can emulate and powers that can be exercised, then there are always arguments against. Here we review some of the more common arguments put forward against interoperability and user empowerment. These include that some users will congregate in unsafe or illegally operating spaces; a valid although already existing concern. It is also suggested that users will not bother switching services or changing moderation engines; however there is evidence that this already taking place, even with high barriers to exit.

There are valid privacy and security concerns, although we argue below that these can be dealt with fairly and reasonably, so long as data protection standards remain high, and enforcement takes place.

It is also argued that the social media market is already competitive, so no intervention is needed. While we highlighted what we believe to be the consequences of dysfunction in the first chapter, we review the counter arguments below.

MAKING PLATFORMS ACCOUNTABLE

Perhaps the most important objection is the likelihood of minimal compliance from incumbents. This can be a serious problem when implementing interoperability requirements, and regulators need to be vigilant.

CREATION OF PROBLEMATIC NETWORKS

If users move away from large, centralised platforms which maintain control over content moderation and platform governance, a reasonable objection may be the creation of networks hosting problematic or extremist content. For example, a decentralised platform like Mastodon could see servers pop up which engage in promoting hate speech, extremist or violent content.

Mastodon addresses this by noting that a server “that does not respect different people and lifestyles will most likely suspend and be suspended by many Instances”.²⁸⁹ Indeed, “most of the communities that are currently on Mastodon will limit or suspend those who spread racist and bigot content. Instances created by racist groups, in fact, are isolated with great

²⁸⁹ Mastodon Help.

EMPOWERING USERS AND CREATING SAFETY

efficiency”.²⁹⁰ Thus, the ability for extremists to be able to reach other groups will be greatly and quickly impeded.

Having smaller, community-run networks speeds up the efficiency of blocking and defederating from extremist groups, which should limit the impact of what they are trying to spread. This is as opposed to large-centralised platforms, where automated content moderation is a “Sisyphean struggle to police violent content”, and when missed, “spreads virally, letting users take advantage of the unprecedented and instantaneous reach offered by the very same platforms trying to police them”.²⁹¹ Centralised platforms with very large reach are attractive to extremist groups, as they thrive off the attention and connections they can generate.

Social media is unlikely to solve systemic issues, but moving away from large centralised platforms optimised for engagement and virality toward more of a “pluriverse”²⁹² of federated platforms can help to curtail their reach and attraction.

290 Mastodon Help.

291 Perrigo, Billy. “A Game of Whack-a-Mole.’ Why Facebook and Others Are Struggling to Delete Footage of the New Zealand Shooting.” TIME, 15 Mar. 2019, time.com/5552367/new-zealand-shooting-video-facebook-youtube-twitter.

292 Rajendra-Nicolucci, Chand, et al. “The Three-Legged Stool: A Manifesto for a Smaller, Denser Internet.” Initiative for Digital Public Infrastructure, 29 Mar. 2023, publicinfrastructure.org/2023/03/29/the-three-legged-stool.

FEW USERS WILL AVAIL THEMSELVES OF SWITCHING

When users are significantly dissatisfied, they will switch services, particularly if there are viable alternatives. For example, as previously mentioned, X “has lost 11 million European users” in tandem with a boycott of X-owner Elon Musk’s other company, Tesla.²⁹³ Users have rejected Musk’s takeover of X for its “encouragement of right-wing political movements” and “the website’s amplification of disinformation and hate speech”.²⁹⁴ New research suggests that users are not happy with the anti-moderation stance that X has shifted towards. In a survey over 10 countries, Theocharis and others find that “most users do not want unregulated spaces. They view moderation as essential to sustaining democratic discourse”.²⁹⁵ Importantly, many users appear to have opted to join Bluesky as an alternative, as its massive expansion after the 2025 US presidential election “indicates that it is gaining traction among users searching for alternatives to established microblogging and social media

293 Starcevic 2025.

294 Starcevic 2025.

295 Theocharis, Yannis, et al. “What People Want From Platforms Isn’t What Musk and Zuckerberg Are Selling.” Tech Policy Press, 6 May 2025, www.techpolicy.press/what-people-want-from-platforms-isnt-what-musk-and-zuckerberg-are-selling.

EMPOWERING USERS AND CREATING SAFETY

services”.²⁹⁶ When given the option, users prefer to switch to platforms whose policies align with their preferences.

Similarly, after Meta’s content moderation changes made in 2025, which, among other things, allow users to say that LGBTQ+ people have “mental illness,”²⁹⁷ Pixelfed, an Instagram alternative built on the ActivityPub protocol, saw a “surge in popularity”.²⁹⁸ Indeed, *404 Media* also reported how users linking to their Pixelfed accounts on Instagram were having their posts taken down as Meta flagged them incorrectly as spam.²⁹⁹ Such takedowns, due to the publicity of the story and “additional buzz on TikTok and other platforms”, further added to the popularity of the app.³⁰⁰ In

296 Whitney, Lance. “Bluesky Hits 20 Million Users and Counting - Watch It Keep Growing Here.” ZDNET, 19 Nov. 2024, www.zdnet.com/article/bluesky-hits-20-million-users-and-counting-watch-it-keep-growing-here.

Dixon, Stacy Jo. Bluesky - statistics and facts. Statista, 22 May 2025, www.statista.com/topics/13203/bluesky/#topFacts.

297 Knibbs, Kate. “Meta Now Lets Users Say Gay and Trans People Have ‘Mental Illness.’” WIRED, 7 Jan. 2025, www.wired.com/story/meta-immigration-gender-policies-change.

298 Shakir, Umar. “Instagram Alternative Pixelfed Now Has Apps.” The Verge, 14 Jan. 2025, www.theverge.com/2025/1/14/24343614/instagram-alternative-pixelfed-app-launch-ios-android.

pixelfed. “We are seeing unprecedented levels of traffic to pixelfed.social, and we are working to keep the service up and provision additional resources! We appreciate your patience.” Mastodon, 12 Jan. 2025, mastodon.social/@pixelfed/113813596301663822 (Accessed 27 May 2025).

299 Koebler, Jason. “Meta Is Blocking Links to Decentralized Instagram Competitor Pixelfed.” *404 Media*, 13 Jan. 2025, www.404media.co/meta-is-blocking-links-to-decentralized-instagram-competitor-pixelfed.

300 dansup. “Pixelfed and Loops: Authentic Sharing, Reimagined.” Kickstarter, 2025, www.kickstarter.com/projects/pixelfed/pixelfed-foundation-2024-real-ethical-social-networks (Accessed 27 May 2025).

MAKING PLATFORMS ACCOUNTABLE

January 2025, Pixelfed was ranked in sixth place in the Social Networking category on the iOS App Store, higher than Facebook and Telegram.³⁰¹ Pixelfed is also working on bringing out an app called Loops, an alternative to TikTok, Sup, an alternative to WhatsApp and Snapchat, as well as an ActivityPub toolkit for developers called Pubkit.³⁰² Such efforts are entirely funded by donations, which quickly raised well over its funding goal on Kickstarter, illustrating “the growing interest in alternative social networks that prioritise users and contribute to a more open and democratic Internet”.³⁰³

FEW USERS WILL TAILOR THEIR FEEDS

As mentioned earlier in this report, feed-tailoring and custom content moderation have seen quick and significant uptake in the case of Blacksky, which reports that “tens of thousands of people [...] post on the feed every day” with “350,000 monthly active users of the feeds”.³⁰⁴ The success of

301 Pixelfed. “Pixelfed Launches Kickstarter: Building Ethical Social Networks for Everyone.” Pixelfed blog, 23 Jan. 2025, pixelfed.blog/p/2025/announcement/pixelfed-announces-kickstarter (Accessed 27 May 2025).

302 Dansup 2025 (Kickstarter).

303 Herter, Marc. “Pixelfed, Loops and Sup: Alternatives to Instagram, TikTok and WhatsApp launch crowdfunding campaign.” Notebook Check, translated by Jacob Fisher, 28 Jan. 2025, www.notebookcheck.net/Pixelfed-Loops-and-Sup-Alternatives-to-Instagram-TikTok-and-WhatsApp-launch-crowdfunding-campaign.953039.0.html (Accessed 27 May 2025).

304 Hendrix 2025.

EMPOWERING USERS AND CREATING SAFETY

Blacksky's content moderation has turned it into a standalone service, showing not only the popularity but the necessity of vertical interoperability solutions to cater to the needs of different groups.³⁰⁵ Other custom feeds, from BookSky to a dedicated Science feed, with over 24,000 and 27,000 users respectively, reveal that users indeed enjoy tailoring feeds to meet their interests.³⁰⁶

PRIVACY AND SECURITY CONCERNS

As a rule, regulators should “not reject interoperability because privacy cannot be made perfect, but rather design interoperability so that privacy is not degraded relative to the setting without interoperability”.³⁰⁷ Opening access to personal data increases the risk of data misuse, such as selling to data brokers, phishing and scamming. That said, Doctorow and Cyphers have found that:

the existence of the GDPR solves the thorniest problem involved in interop[erability] and privacy. By establishing the rules for how providers must treat different types of data

305 Fraser (Blacksky Algorithms).

306 Limeleaf Worker Collective, LLC. “Bluesky Feeds.” Bluesky Directory, 2025, blueskydirectory.com/feeds/all (Accessed 27 May 2025).

307 Morton et al 2023, p. 1035.

MAKING PLATFORMS ACCOUNTABLE

and when and how consent must be obtained and from whom during the construction and operation of an interoperable service, the GDPR moves hard calls out of the corporate boardroom and into a democratic and accountable realm.³⁰⁸

This should however serve as a warning that data protection standards need to remain high, or adoption of interoperable services could be undermined. Furthermore, services receiving data should not assume that they have wide permission to do as they wish with what they receive. For example, a service receiving posts ought to assume they have permission to reshare this with followers, but not to build ‘shadow’ personal profiles of the external user. Data regulators will need to be ready to enforce against abuse, as they would in any other area where data is shared.

The CMA, in their recommendation of introducing cross-posting interoperability measures, argues that consent is likely to mitigate concerns such as those around spam. By choosing to follow or be followed by users on external platforms, the user can retain control of their interactions:

there are potential risks associated with the privacy of users’ data, if users lose control over their data, and

308 Cyphers and Doctorow 2021.

EMPOWERING USERS AND CREATING SAFETY

automatic ‘spamming’. However, as long as the decision to post content across platforms is user-initiated and well-informed, including full clarity over permissions, it should be possible to address those concerns. Indeed, we note that users are currently able to cross post content from Instagram to other platforms, such as Facebook, Twitter and Tumblr, which indicates that Facebook can design this functionality in a manner that protects against those concerns.³⁰⁹

Indeed, taking the example of back-end interoperability, so long as consent, data minimisation and purpose limitation are in place and are:

enacted consistently with the GDPR, a user of one social media service who had become ‘friends’ with the user of another, interoperable service, should receive status updates and other content shared by their ‘friend’ but not any other information from that service. That user may also be able to see the number of times an update has been ‘liked’, but not the identities of the users of the second service who have done so. And the user’s social media service should likewise process information from the

309 Competition and Markets Authority 2020 (Appendix W: assessment of pro-competition interventions in social media), p. 13.

MAKING PLATFORMS ACCOUNTABLE

‘friend’ solely for the purpose of facilitating interoperability
– not, for example, for creating an advertising profile of the
friend.³¹⁰

Ensuring data protection is enforced will go far in solving privacy and security concerns of interoperability of social networks.

Mandating platforms to allow interoperability functions will likely involve allowing them to design those measures, meaning they can ensure that genuinely bad actors requesting access can be blocked. Doctorow and Cyphers suggest that mandating transparency in this process will mean that there are checks on when access to a platform’s API is blocked and if this is in response to a genuine security concern or an anticompetitive act.³¹¹ It should be made clear that developers who can prove data security should be allowed access.

Of final note, it should be understood that less concentrated markets should lead to more options for users to select platforms offering better privacy terms than incumbents. While Facebook users may previously have been able to demand better privacy conditions when they had more leverage, the lack of viable alternatives and growing dependency on

310 Brown, Ian. “Making Interoperability Work in Practice: Forms, Business Models and Safeguards.” Ada Lovelace Institute, 16 Dec. 2021, www.adalovelaceinstitute.org/blog/making-interoperability-work-practice (Accessed 27 May 2025).

311 Cyphers and Doctorow 2021.

EMPOWERING USERS AND CREATING SAFETY

Facebook allowed the company to grow its advertising empire and data collection practices to follow users all over the web.³¹² Brown suggests that:

looked at another way, interoperability could provide strong market-driven, retention incentives to companies to improve user privacy, both generally by increasing competition and the ability of privacy-sensitive customers to switch services, and specifically by supporting users to choose more privacy-friendly components of services (such as a personal data store running sandboxed analysis apps), where such modularity has been enabled.³¹³

Bourreau, Krämer and Buiten point out that it “is thus misleading to think that complementors may always be detrimental to the safety and privacy

312 For example, in 2010, 26,000 people had committed to delete their Facebook accounts, signing a pledge on a Quit Facebook Day Website. The protest was in response to Facebook’s privacy changes, in particular the introduction of Facebook Beacon, which was an early advertising experiment that tracked Facebook user activity on more than 40 participating websites. Facebook rolled back the initiative due to the overwhelmingly negative reaction. - Paul, Ian. “It’s Quit Facebook Day, Are You Leaving?” PCWorld, 31 May 2010, www.pcworld.com/article/506866/it-quit-facebook-day-are-you-leaving.html (Accessed 27 May 2025).

Carlos Perez, Juan. “Facebook’s Beacon More Intrusive Than Previously Thought.” PCWorld, 30 Nov. 2007, web.archive.org/web/20080605163325/http://www.pcworld.com/article/id,140182-c.onlineprivacy/article.html (Accessed 27 May 2025).

Zuckerberg, Mark. “Our Commitment to the Facebook Community.” Meta Newsroom, 29 Nov. 2011, about.fb.com/news/2011/11/our-commitment-to-the-facebook-community (Accessed 27 May 2025).

313 Brown 2021 (Making Interoperability Work in Practice: Forms, Business Models and Safeguards).

MAKING PLATFORMS ACCOUNTABLE

of the hosting platform ecosystem. They could likewise encourage competition for more safety and privacy”.³¹⁴ For example, most community-run apps and services like Mastodon collect little to no user data, and conversely, Mastodon users federating to Meta’s Threads are more likely to face potential degradation of their privacy expectations rather than the other way around.³¹⁵

CLAIMS THAT THE MARKET IS ALREADY COMPETITIVE

Defining what exactly is meant by the “social media market” is itself a challenge being debated in US courts.³¹⁶ However, it should be considered that while certain social media sites have catered to niches, such as LinkedIn catering to business use cases, they are “nearly always used in combination with Facebook”.³¹⁷ What this shows is that while other platforms exist, none appear to compete with or represent a substitute for Facebook. Importantly, it should be considered that the “wider ‘family’ of Facebook platforms reinforces Facebook’s competitive position; consumers

314 Bourreau et al. 2022, p. 31.

315 Blankertz and Windwehr 2025, p. 47.

316 Bordelon, Brendan. “Zuckerberg testifies as FTC, Meta trade opening salvos in antitrust trial.” POLITICO, 14 Apr. 2025, www.politico.com/news/2025/04/14/zuckerberg-meta-trial-instagram-whatsapp-00288603.

317 Competition and Markets Authority 2020 (Online platforms and digital advertising: Market study final report), p. 147.

that ‘switch’ some of their time away from the Facebook platform may remain within the Facebook ‘ecosystem’ of apps”.³¹⁸ The fact that Meta’s four apps comprise the most-used social media platforms further reinforces this argument.³¹⁹ While many users may not agree with Meta’s policies (for example, recent changes on content moderation or Meta’s privacy policies) and may be frustrated with the degradation of its services, users are locked in and unable to recreate their network of social connections elsewhere, a huge switching barrier.³²⁰

MINIMAL COMPLIANCE AND RESISTANCE TOWARDS OBLIGATIONS

Commentators sometimes object that interoperability mandates may not work, as platforms are likely to undermine the mandates through minimalistic compliance. However, this need not be the case. Brown summarises a range of examples where interoperability remedies have been deployed:

318 Competition and Markets Authority 2020 (Online platforms and digital advertising: Market study final report), p. 130.

319 Dixon 2025 (Most popular social media platforms in the United Kingdom (UK) as of the third quarter 2024, by usage reach).

320 Bellan, Rebecca. “Google Searches for Deleting Facebook, Instagram on the Rise After Meta Ends Fact-checking.” TechCrunch, 9 Jan. 2025, techcrunch.com/2025/01/09/google-searches-for-deleting-facebook-instagram-explode-after-meta-ends-fact-checking.

Theocharis et al. 2025.

MAKING PLATFORMS ACCOUNTABLE

under existing competition laws in some of the key cases of the digital era: preventing Microsoft from locking competitor browsers out of Windows, and more recently requiring Google to make it easier for European Android users to choose an alternative default search engine and for specialised search engines to feature in search results.³²¹

The growing appetite for ex ante legislation in the digital sector is largely borne from dissatisfaction with the slowness of traditional competition cases, often years long and sometimes the conduct being investigated has already changed or become irrelevant by the time the case is resolved.³²² Another concern with traditional ex post antitrust enforcement has been a dissatisfaction with the results of remedies, which involve years of back-and-forth litigation.³²³ New ex ante law, like the DMCCA, provides a new opportunity to negotiate with big tech firms to mandate interoperability functions or risk high non-compliance fines.³²⁴ Due to the participatory nature of the DMCCA, it has been designed that CRs and PCIs will largely

321 Brown 2021.

322 Sciaudone, Francesco et al. Study 'Ex post evaluation of the implementation and effectiveness of EU antitrust remedies.' European Commission, 20 Feb. 2025, competition-policy.ec.europa.eu/document/download/d04025e4-fd50-4ac4-8336-01a7bdf92713_en?filename=2025_ex-post_evaluation_antitrust_remedies_study_Factsheet.pdf (Accessed 27 May 2025).

323 Sciaudone et al 2025.

324 Competition and Markets Authority 2024 (Digital Markets Competition Regime Guidance).

EMPOWERING USERS AND CREATING SAFETY

be agreed upon by the SMS firm by the time it is enforced, reducing the need for back-and-forth litigation regarding compliance.

The UK's regime also has the added value of hindsight. Entering into force one year after the European DMA, we can learn from the difficulties of the DMA's first year of enforcement, including the gaps that the DMA has so far missed. This includes social media interoperability, which is not yet part of the DMA framework; rather it is currently being studied for potential inclusion under the DMA.³²⁵ The UK could work with the European Commission to align interoperability requirements in both jurisdictions, giving them more leverage to impose rules.

The UK also has examples to learn from, such as the Open Banking example explained previously in this report. This resulted in full compliance from the large incumbents and resulted in a booming market of fintech firms. If required, the CMA could pull lessons from that example, such as mandating an Implementation Entity and a Trustee to draw up standards and accredit data access seekers.

325 European Commission "Call for tenders for a study of interoperability tools in the digital single market." Digital Markets Act (DMA), 25 June 2024, digital-markets-act.ec.europa.eu/dma-call-tenders-study-interoperability-tools-digital-single-market-2024-06-25_en (Accessed 27 May 2025).

CONCLUSION AND RECOMMENDATIONS

GOVERNMENT CAN STOP FAVOURING SPECIFIC PLATFORMS

We recommend that the government support interoperability by ensuring that they do not favour specific platforms. We suggest the use of cross-posting tools to prevent overreliance on specific channels. For example, we noted that that government and MPs still favour the use of X. Until recently, only X accounts linked from Parliament, for example. We recommend that government officials and comms teams consider joining Fediverse and decentralised social networks like Bluesky, perhaps migrating networks through Sky Bridge and using cross-posting tools like Buffer to maintain social presence on various networks. MPs with Threads accounts can take the simple step of enabling sharing with the Fediverse. We also urge government to reduce its dependency on Facebook for political advertising.

1. Publish content to ActivityPub and Bluesky accounts

EMPOWERING USERS AND CREATING SAFETY

2. Consider following in the footsteps of the German Federal Commissioner for Data Protection and Freedom of Information (BfDI), which operates its own Mastodon instance for press and public relations.³²⁶ It also allows other federal authorities to use the instance to operate their own official agency accounts.³²⁷
3. Enable people to follow official Threads accounts on the Fediverse, if these are used. This option has to be enabled, but is a simple way for official accounts to be visible beyond Threads
4. Enable people to follow gov.uk blogs through the ActivityPub plug in Wordpress: each blog is turned into an account you can follow
5. Publish content on Flipboard or other commercial services: BBC News, for example, has accounts which can be followed on the Fediverse
6. Ensure ad spending is distributed across different platforms
7. Ensure MPs can advertise all of their social media accounts
8. Provide facilities for MPs and government to cross-post to multiple platforms

326 Federal Commissioner for Data Protection and Freedom of Information. "Quick Access to the Mastodon Network." BFDI, 26 Apr. 2022, www.bfdi.bund.de/SharedDocs/Kurzmeldungen/EN/2022/04_Schnelleinstieg-Mastodon.html (Accessed 27 May 2025).

327 social.bund.de. "About." Mastodon, social.bund.de/about (Accessed 27 May 2025).

MAKING PLATFORMS ACCOUNTABLE

9. Create a programme for schools and universities to provide curated federated social media platforms
 10. Change the Online Safety Act to exempt small and safe sites from its duties
-

THE CMA CAN BUILD THE CASE AND TAKE ACTION

Much of the work has already been done by the CMA itself through its in-depth market study. The CMA has already recommended that, with respect to the new DMCCA legislation:

we consider that enabling consumers to easily access their Facebook connections to invite them to other platforms and to post content seamlessly across platforms would be reasonable first steps to take given the potential benefits and limits risks associated with these interventions. Subject to the effectiveness of these interventions and future market developments, we consider that the DMU should also have the power to implement more widespread interoperability measures, such as content interoperability, if they are deemed to be effective and proportionate.

EMPOWERING USERS AND CREATING SAFETY

Consequently, we recommend that the DMU be given powers to mandate interoperability.³²⁸

Even these interventions that the CMA has already suggested would improve social media interoperability. In line with the Furman review, which underpins the DMCCA regime, we would also urge the DMU to mandate “enabling greater personal data mobility and systems with open standards” to help users switch social networks without losing their information.³²⁹

We recommend that the CMA cooperate with the European Commission in enforcing such remedies. The CMA could consult with the Commission on its market study findings, and, conversely, the Commission could share the outcome of its respective findings from its recently commissioned study. They should align interoperability requirements under the DMA and DMCCA, giving both jurisdictions more leverage to impose rules.

The EU Commission has signed a Cooperation Arrangement with the Japan Fair Trade Commission, opening the door for the two competition authorities to exchange technical expertise and best practices on implementation of their respective legislations.³³⁰ A similar agreement

328 Competition and Markets Authority 2020 (Appendix W: assessment of pro-competition interventions in social media), p. 18.

329 Digital Competition Expert Panel 2019, p. 5.

330 Eu Commission 2025 “Commission’s services sign arrangement with Japan Fair Trade Commission with common goal of promoting contestability, competition and fairness in digital

MAKING PLATFORMS ACCOUNTABLE

could be made between the CMA and the Commission to collaborate on interoperability obligations to ensure consistent enforcement.³³¹

10. The CMA should build its cooperation and coordination on enforcement of interoperability requirements in the tech sector with EU institutions.
11. The CMA should progress its work on social media interoperability to concrete obligations, by
 1. Beginning the investigation process to designate Meta as a firm of Strategic Market Significance in social media
 2. Creating CRs or PCIs to remedy Meta's market concentration, with a focus on social media switching, including:
 3. Requiring Meta to allow cross-posting, the ability to invite friends to new platforms, improved data mobility tools, and back-end interoperability measures such as the ability to view, like, and comment on a Meta user's content without being a

markets" https://digital-markets-act.ec.europa.eu/commissions-services-sign-arrangement-japan-fair-trade-commission-common-goal-promoting-2025-07-23_en

³³¹ Such an agreement could build off the incoming EU–UK Competition Cooperation Agreement. See: DLA Piper. "From membership to partnership: The future of EU–UK Competition Law cooperation." 28 August 2025, <https://blogs.dlapiper.com/advocatus/2025/08/from-membership-to-partnership-the-future-of-euuk-competition-law-cooperation/#page=1> (Accessed 29 August 2025).

EMPOWERING USERS AND CREATING SAFETY

member of a Meta platform, or to switch provider without losing access to Meta's network

4. Opening up recommendation and moderation systems within Meta's platforms

INFORMATION COMMISSION SHOULD ENSURE STRONG PRIVACY

The Information Commission, as it will shortly be, must show that they are willing to enforce against abuses of data, and protect users who are engaging with interoperable social media. The Commission should:

1. Issue guidance for interoperable social media, regarding how personal data and content can be used
2. Enforce against abuses of personal information where they occur

OFCOM SHOULD HELP DEVELOP INTEROPERABILITY

Ofcom need to ensure that the Online Safety Act does not continue to impede the diversity of UK social media. They should

MAKING PLATFORMS ACCOUNTABLE

1. Work with government to exempt small but harmless sites from the provisions of the OSA
2. Work with the CMA particularly regarding encouraging safety through social media switching and market pressures
3. Investigate and encourage horizontal interoperability for moderation and recommendation engines, and cross-market moderation and prioritisation technologies
4. Investigate and encourage vertical interoperability as a safety and moderation strategy within platforms.

ORGANISATIONS CAN SUPPORT THE CHANGE

Organisations can ensure they are not entrenching dependencies on certain social networks by cross-posting between different networks.

Very simple steps organisations can take include:

12. Allowing users to follow blogs via the WordPress or Drupal ActivityPub plug in
13. Allowing Threads accounts to be followed across the Fediverse

EMPOWERING USERS AND CREATING SAFETY

14. Using cross-posting tools like Buffer to publish to Fediverse and BlueSky accounts

Policy and advocacy steps:

15. Advocate for interoperability mandates (both for “feeds” and for “account federation”) in recommendations for future government or regulatory action
16. Further to this, organisations can help to support initiatives like Free Our Feeds, which aims to provide financial support to run the AT Protocol and develop a new, decentralised network of networks.³³²
17. Organisations can call for the AT Protocol designers to include support for following and being followed by ActivityPub accounts
18. Respond to CMA calls for evidence regarding recommender feed harms

More ambitious but achievable steps:

19. Provide your own safe social media environments, for example, school-based social media platforms, or community social media platforms or discussion forums

³³² Free Our Feeds.

MAKING PLATFORMS ACCOUNTABLE

20. Certain civil society organisations could help set up and support alternative feeds and content moderation initiatives like Blacksky, but suited toward their cause, such as child safety online.

CREDITS

[Mark Zuckerberg, Alessio Jacona. CC By](#)

[Threads screen shot.](#) Copyright Meta

[Elon Musk, Gage Skidmore. CC By](#)

[Elon Musk, Gage Skidmore. CC By](#)

[Tubes-fr-screen.png.](#) Copyright education.fr