

EUROPEAN CENTER FOR NOT-FOR-PROFIT LAW

ECNL IMPACT REPORT

2025



European Center for
Not-for-Profit Law

WHO WE ARE

ECNL is a team of dedicated, bold and creative legal experts, analysts, and activists committed to protecting and expanding the space for people to gather, organise and take action for a better world.

We focus on the laws, policies, processes and practices that enable our spaces for action. Over the last 20 years, we have tenaciously worked to protect the rights that empower people to achieve change and actively participate in democratic and civic life.

WHAT WE DO

We work with individuals and groups to take collective action and address societal challenges.

By championing civic freedoms, anticipating and analysing trends shaping collective action and strengthening legal protections, ECNL partners to defend our spaces for action and inspire progressive change. We help create environments where people have the power, resources, and legal support to unite in solidarity, where communities engage in social movements, and individuals actively contribute to democratic processes. Collaborating across sectors and with diverse global and regional institutions, we co-create dynamic coalitions that safeguard rights and foster vibrant platforms for meaningful, transformative change.

WHAT WE'RE WORKING TOWARDS

ECNL's vision is a world where every individual has the freedom, power and possibilities to shape a just, inclusive and sustainable future through collective action.

In our vision, people flourish in a world and a planet which are thriving, just and safe. People are empowered with the freedoms and resources to unite, express themselves, and shape their societies. Institutions and processes are participatory, rooted in justice, human rights, and equity. A diverse, vibrant ecosystem of advocates protects and expands the ability of people to create a positive change.

A YEAR IN REVIEW: HOW ECNL MAKES IMPACT



Source of photos and visuals used throughout the report, unless otherwise indicated: Canva

CSO METER: LIFELINE IN A MOMENT OF REAL UNCERTAINTY



Members of the activist movement "RoR Chişinău - Rhythms of Resistance" during a demonstration condemning the Russian invasion of Ukraine and expressing support for the Ukrainian people. 24 August 2024 (Photo credit: Kseniia Lapa)

We built a model that proves that with strategic investment civil society monitors can continue to protect freedoms, even in restrictive environments.

In 2025, civil society across the Eastern Partnership region faced escalating and interconnected pressures. The ongoing Russian war against Ukraine, rising repression of activists in Georgia or Azerbaijan, the collapse of USAID and with it huge [shifts in the international funding system](#) tested the limits of their resilience.

Our partners of the [CSO Meter](#), a collaboration tracking changes in civic freedoms in the region, were also significantly impacted, but did not stop. They continued to turn evidence into action to protect their space even in the middle of disruption.

Through solidarity, partnership and funding, the CSO Meter became a lifeline. The CSO Meter action fund delivered flexible financial support that allowed organisations to keep working, adapt, and push forward critical reforms even under extreme pressure. In countries facing war, restrictive laws or financial isolation, this meant continuing to provide essential services, defend organisations' access to funding, and engage governments on reforms that would otherwise have stalled. In Armenia, partners increased CSOs' ability to bring [public interest cases to court](#) and engaged with the Prime Minister's Office [to boost public participation](#).

In Ukraine, they worked to expand [CSOs' access to wartime funding](#) and financial services by [modernising aid registration](#), embedding CSOs' input in [risk-based AML/CFT assessments](#) and facilitated [strategic dialogue](#) on Ukraine's new National Strategy for Civil Society Development. And in Moldova, partners convened discussions that shaped a [digital rights reform roadmap](#) featured in an Ombudsman study. These targeted interventions ensured that CSO Meter Hub members did not retreat but stayed active, visible, and effective in protecting rights and democratic space.

The CSO Meter model matters because of what it reveals about moments of real uncertainty. With the right kind of support, organisations can stay on their feet, adjust, and keep going when it counts the most. This is not merely emergency support: it is a strategic approach to sustaining civic action in the hardest conditions. Civil society remains a cornerstone of stability and democracy in the region, but it is being asked to do more with less than ever before. With greater investment, the CSO Meter model can expand from sustaining a network to supporting an entire region's democratic resilience.

The difference this work made:

Dedicated and strategic action fund allowed civil society monitors to continue their work.

Critical democratic voices among our CSO Meter Hub partners remained active and united despite growing pressure in the most challenging year to date.

Spaces for dialogue and reform were protected and expanded in countries.

CSO Meter served as inspiration under the [EU Civil Society Strategy](#), spotlighting the critical EU support for CSO-led civic space monitoring at times of declining trust and commitments to the work of the sector.

When we launched the CSO Meter project in Armenia in 2017, we could never have anticipated the importance and continued relevance it would have. What began as a small initiative for Transparency International Anticorruption Center has grown into one of our core strategic directions. CSO Meter has deepened our commitment to advocating for an enabling civic space, which we recognize as vital for promoting good governance, transparency, and anti-corruption – key areas of our work.



Transparency International Anticorruption Center, Armenia

CSO Meter brought structure to fragmented efforts. It united CSOs around a common framework, its data provided much needed evidence for advocacy, and opened doors to dialogue with public institutions. CSO Meter became a reference tool for defending the civic environment.



Promo-LEX, Moldova



Protecting democratic norms in Hungary.

2025 saw a sweeping assault on civil society, likely aimed to undermine its power before the elections. The proposed “Transparency Act” would have entrenched authoritarian control by cutting off access to funding for CSOs, independent media and other critical voices. Crucially, its impact would have extended far beyond the civic sphere: by imposing obligations on banks and anti-money laundering authorities, the law exposed how restrictions on civic space are increasingly embedded within broader regulatory and financial systems. In its [analysis](#), ECNL demonstrated that the bill was fundamentally incompatible with both human rights and anti-money laundering frameworks, rendering it legally untenable. By framing the issue not only as a civic space concern but also as a regulatory and financial integrity risk, ECNL broadened the coalition capable of opposing the measures.

This underscores the value of ECNL’s approach. By engaging financial institutions, regulators and economic actors, civil society can surface the wider systemic risks of such measures and mobilise constituencies with both the leverage and credibility to challenge them. In restrictive contexts, where traditional advocacy space is constrained, such cross-sector alliances become essential to maintain resilience.

The political shift in 2026 now opens a critical window: an opportunity not only to dismantle restrictive measures, but to rebuild durable safeguards for civic space - grounded in stronger cross-sector alignment to prevent future backsliding.



Uniting for Change

Lasting change happens if civil society leads with bold advocacy and builds alliances beyond its traditional sphere. That is why we launched Uniting for Change - a flagship initiative that mobilises diverse actors, including development banks, businesses, security and economic institutions, to expand the base of support for civic action. We do this by bringing people together to anticipate emerging threats, scale strategies that already work, and build a dynamic community committed to learning, collaboration, and systemic change. Through the targeted sub-grants, mentoring and strategic guidance we provide, partners have already begun translating this approach into practice: advancing preparedness and response mechanisms in Serbia, strengthening coalitions and financial sector engagement in Bulgaria, or engaging new actors, such as community connectors in North Macedonia. Early 2026, we also convened human rights activists, journalists, and representatives from LGBTQI+, environmental, finance, development, business sectors from 12 countries for visioning and targeted simulations, testing possible strategies to respond to typical arising restrictions. This process challenged conventional advocacy models and catalysed new approaches to take forward, including narrative shifts, business coalition-building, financial sector outreach, and proactive reform agendas.

The simulations showed me how important it is to anticipate different types of restrictions (legal, financial, and narrative) before they fully materialise. Instead of reacting to crises, I want to incorporate more proactive risk assessment and preparedness strategies into our organisational planning.



Participant of the Civic Resilience Simulation training from Kyrgyzstan

Bringing together people from different countries, sectors, and roles enriched the learning experience and allowed us to recognize shared patterns as well as context-specific differences. This comparative perspective was especially valuable for identifying transferable strategies and building a sense of regional solidarity.



Participant from Serbia

PROTECTING FINANCIAL ACCESS AND COMMUNITY GIVING UNDER NEW EU ANTI-MONEY LAUNDERING RULES

We improved draft technical standards for financial institutions, ensuring that civil society organisations are not cut off from essential banking services.

In May 2024, the EU adopted a [new legislative package](#) to better align rules on anti-money laundering and countering the financing of terrorism (AML/CFT) across Member States, with implementation planned for July 2027. While the reform aims to address emerging risks, it raised significant concerns for the civil society sector. In particular, stricter due diligence requirements could lead to increased scrutiny of human rights defenders and organisations, making it harder for them to open bank accounts. In addition, bringing crowdfunding platforms under these rules introduces new compliance burdens, which put [pressure on smaller, donation-based platforms](#). This may discourage donations and reduce fundraising options for nonprofits.

We identified an important opening, as the detailed Regulatory Technical Standards and guidelines are still being developed. Because these define the exact scope of the obligations, this is a crucial stage to get involved. Together with the [Human Security Collective](#), [Philea](#), [Civil Society Europe](#) and the [European Fundraising Association](#), ECNL engaged constructively with the European Banking Authority, and successfully secured important improvements to these technical rules - helping to ensure they better reflect the realities of civil society and reduce unintended barriers.

The most important change was that having nonprofits as clients no longer increases the risk profile of banks and other financial institutions - an important safeguard against unnecessary refusals of services. Similarly, philanthropic projects are no longer treated as riskier than other types of crowdfunding initiatives. This means that a charity or public-interest campaign trying to raise money - whether for community support or human rights work - should be able to use crowdfunding platforms on the same terms as any other project, without facing unfair barriers, delays, or refusals simply because of the cause it represents.

Another systemic shift is the increased flexibility in identifying groups, such as asylum seekers, refugees or stateless persons, who may not have standard identification documents for legitimate reasons. Financial institutions can now rely on alternative, credible ways to verify a customer's identity, making this a significant step toward financial inclusion for people who would otherwise struggle to open a bank account.

These changes demonstrate the value of early, cross-sector engagement in shaping technical rules that have far-reaching consequences for civic space. ECNL will continue to engage with the emerging AML Authority and monitor the remaining standards to ensure implementation remains proportionate, risk-based, and supportive of civil society.



Nadia Nadesan & Digit / <https://betterimagesofai.org/>

The difference this work made:

Civil society's access to financial services improved.

Philanthropic projects are no longer considered to have a higher risk than other types of crowdfunding initiatives.

People in vulnerable situations, such as those forced to flee and not having standard identification documents, have easier access to financial services.

Participatory democracy

TOWARDS AN EU FRAMEWORK TO MONITOR CIVIC SPACE

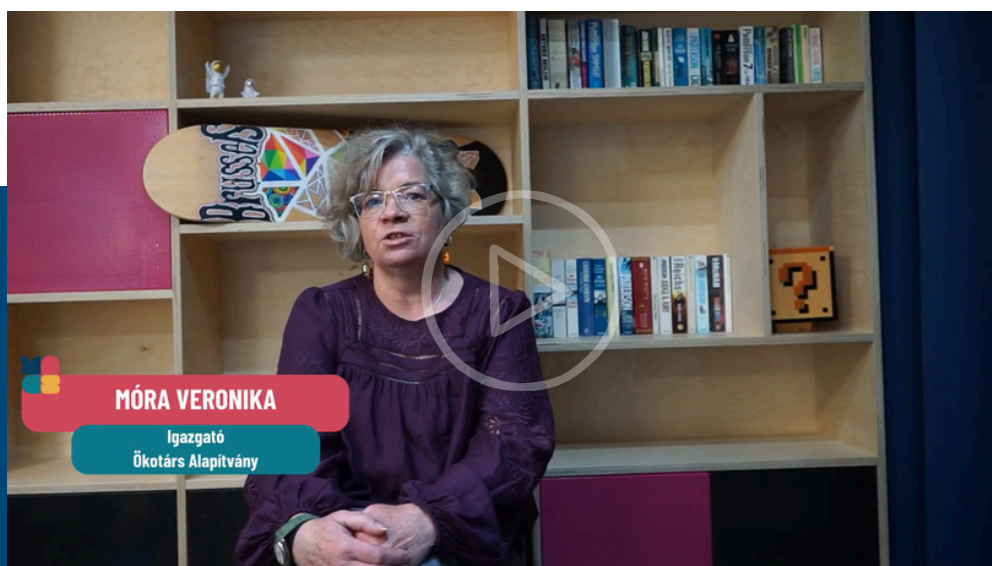
ECNL led a 2-year co-design process to develop a robust, systematic approach for monitoring the space for civic action in the EU.

In 2025, several alarming developments shook civil society across the EU. In March, Hungary passed a [law banning Pride events](#) and public support for LGBTQI+ rights, while [expanding the use of facial recognition](#) technology for monitoring peaceful protesters. In the Netherlands, legislative proposals [threatened protest rights and humanitarian aid](#). Meanwhile, in Bulgaria, [amendments to the Criminal Code were fast-tracked](#), restricting freedom of expression and assembly. These incidents show how quickly fundamental freedoms can come under threat and how civil society faces growing risks when defending rights. European organisations have long called for stronger EU tools to protect freedoms, including a monitoring and alert mechanism across Member States. ECNL brought together civil society organisations to co-design a methodology that makes this possible: the [Monitoring Action for Civic Space \(MACS\)](#). It is the first tool to systematically channel national developments to EU decision-making through country reports and early warning alerts. Rooted in EU law and values, MACS was piloted in 7 countries in 2025. In a short time, it has gained recognition as a key instrument to monitor civic space in the EU- providing the timely, nuanced evidence that helps prevent problems early on and respond when issues or attacks occur at national or EU level.

This approach shows the importance of translating fragmented national developments into actionable, EU-level insight and response. By combining legal expertise, real-time monitoring, and close partnerships with national actors, we not only documented violations and opportunities but elevated them into the European policy arena - where leverage for change is greatest. Through MACS, early warning signals are no longer isolated incidents but part of a structured evidence base that can inform EU institutions, shape policy debates, and trigger timely interventions. This positions civil society monitors as a critical bridge between local realities and EU decision-making, strengthening the EU capacity to detect, prevent, and respond to threats to our spaces for action in a coordinated and systemic way.

The [EU Civil Society Strategy](#) emphasises that effective monitoring is essential for supporting and protecting CSOs in their work. MACS was developed with the vision to fill that call. Now tested and finalised, the methodology is ready for wider use across Europe to strengthen early warning, coordination and response.

Watch this playlist to find out more from civil society firsthand.



The difference this work made:

Civil society developed the first EU-level civic space monitoring tool that systematically gathers national data and assesses it against an EU framework.

Real-time developments affecting civic action were channelled to the attention of the EU.

7 European civil society organisations could monitor civic space collectively, which made collaboration between them stronger and opened an avenue to share experiences and best practices.

Structured EU-wide evidence on civic space conditions was gathered.

MACS provided us with a great monitoring tool that is civil society-led and grounded in European standards. It gave us with a structured framework for our civic space monitoring work in a time where developments are going so fast that it's hard to keep track.

Aicha Chaghoulani, Netherlands Helsinki Committee



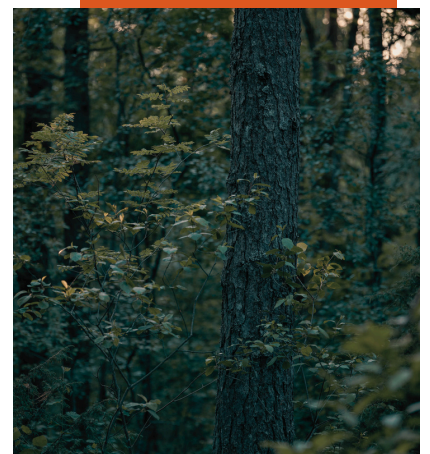


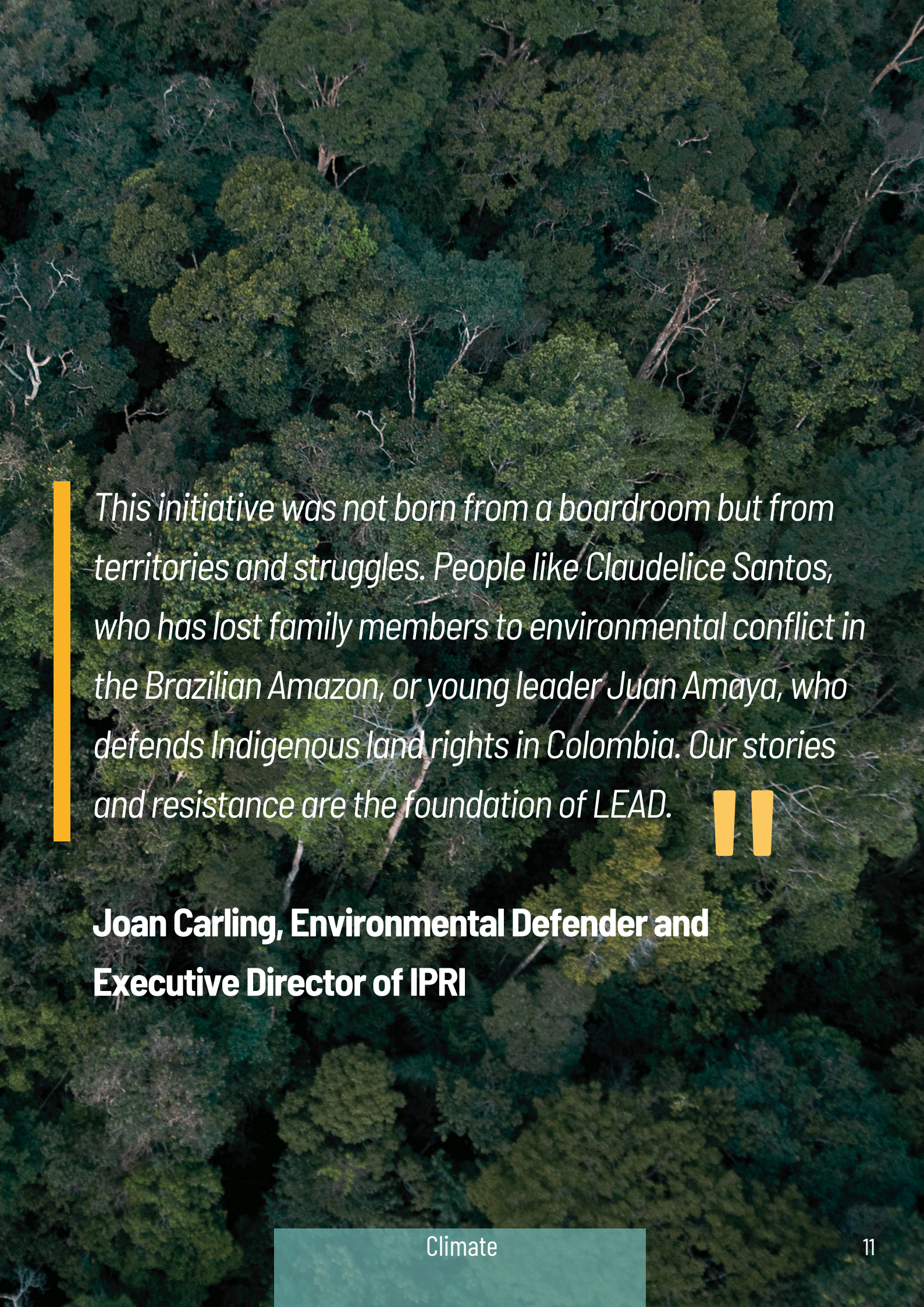
Defending peaceful protest: Shaping global standards on civil disobedience offline and online.

Across the world, people who speak up for their rights or in solidarity with marginalised groups face increasing restrictions, excessive penalties and force, simply for protesting peacefully online or offline. This is the case, for instance, for those campaigning [to protect the environment](#) or act [in solidarity with migrants](#). ECNL provides legal expertise that helps shape UN standards that recognise the value of peaceful protest, even when they may be disruptive and technically unlawful. For example, we contributed to the [position paper](#) and [new guidelines](#) from the UN Special Rapporteur on Environmental Defenders, which sets out concrete steps for governments, media outlets and national human rights institutions to better protect the rights of environmental activists and human rights defenders. We are working with national partners to put these safeguards into practice and use them before national and international courts to stand up for those whose voices are being silenced. We bring together activists, lawyers, judges and policymakers to explore how the guidelines can be applied, and also help civil society identify and document disproportionate restrictions on peaceful protests and civil disobedience.

Global initiative to place environmental defenders at the heart of climate decisions: The LEAD Initiative.

At COP30, ECNL and partners launched the [Leaders Action Network for Environmental Activists and Defenders \(LEAD\)](#), a global initiative to protect defenders, secure their formal recognition as key climate actors and strengthen their effective participation in international climate processes. Co-created with more than 300 activists across Latin America, Africa, Asia-Pacific and beyond, LEAD is designed to centre the experiences of those most affected by climate violence. The initiative is supported by a broad coalition of organisations, more than [100 thousand citizens](#) and has been endorsed by government champions, including Brazil's Minister of Indigenous Peoples, alongside other high-level political leaders. After the launch, the priority will be to ensure that grassroots struggles are more directly reflected in international processes.





This initiative was not born from a boardroom but from territories and struggles. People like Claudelice Santos, who has lost family members to environmental conflict in the Brazilian Amazon, or young leader Juan Amaya, who defends Indigenous land rights in Colombia. Our stories and resistance are the foundation of LEAD.

**Joan Carling, Environmental Defender and
Executive Director of IPRI**

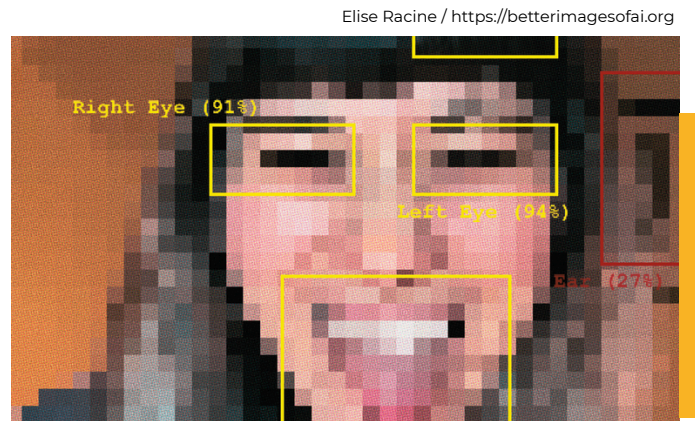
CHALLENGING FACIAL RECOGNITION IN HUNGARY

We mobilised civil society to advocate against laws that allow the police to use facial recognition during Pride events.

In March 2025, amendments [criminalising LGBTQI+ demonstrations](#) and increasing biometric surveillance were rushed through the Hungarian Parliament without any public debate. These changes dramatically expand the use of [facial recognition technology](#) during events, such as the Budapest Pride. This risked deterring people from exercising their right to protest: if they know they may be scanned, identified, and punished for participating in a peaceful protest, many may decide to stay away. Yet despite legal uncertainty and risks, Budapest Pride saw record turnout: an estimated 2-300,000 people marched under the rainbow flags.

We partnered with human and digital rights organisations - the [European Digital Rights](#), [Civil Liberties Union for Europe](#) and [Hungarian Civil Liberties Union](#) - to protect fundamental rights in Hungary. Our joint legal analysis shows that the law likely [violates the recently adopted EU AI Act](#), which prohibits real-time biometric surveillance, making this case the first real test of the EU legislation.

We coordinated an [open letter to the European Commission](#), signed by over 40 organisations, urging them to investigate the potential violation. In parallel, we supported Hungarian partners in preparing national interventions to the Hungarian Data Protection Authority, and exploring potential litigation avenues.



One year later, Hungarians' fundamental rights remain at risk and the use of facial recognition in Hungary remains unchallenged. Facial recognition vans were spotted at both the Budapest and Pécs Pride in 2025 events, and criminal procedures were initiated against the organisers. The change in government in 2026 presents a new opportunity to push for the repeal of the law. We will support national partners in their advocacy efforts to reverse the harmful measures. At the same time, if the legislation remains in place, we will continue to back potential litigation and work with the European Commission to ensure that Hungary complies with EU laws.

The difference this work made:

Civil society and LGBTQI+ groups mobilised to respond to the unlawful use of facial recognition in Hungary.

Civil society and policymakers became more aware of the potential violation of the EU Artificial Intelligence Act.

The European Commission was under increased public pressure to fulfill its role as the guardian of the EU Treaties and protect fundamental rights in Hungary.

Supporting exiled groups that face transnational repression. An increasing number of human rights and environmental defenders are being forced to find alternative ways to continue their work due to serious threats to their lives. Yet relocation brings new challenges, including how defenders can access banking services, open accounts or transfer funds. That is why ECNL formulated policy recommendations to the EU, national governments and banks to ensure that exiled groups can have [reliable access to funding](#) and sustain their work when seeking safety. We also research emerging threats to these communities: our new study reveals [how artificial intelligence \(AI\) surveillance and platforms amplify transnational repression](#), enabling governments to suppress dissent beyond borders. This trend reveals a widening gap between the speed of technological change and the pace of democratic governance. Tackling these harms and protect the most vulnerable demands coordinated action across civil society, academia, governments, and international organisations - and we provide targeted recommendations on how this can be achieved.

CLOSING THE NATIONAL SECURITY GAP IN AI POLICY AND REGULATION



Pauline Wee & DAIR / <https://betterimagesofai.org>

As governments increasingly use AI in security and surveillance across Europe and beyond, ECNL worked to ensure that human rights safeguards are applied in practice.

States have carved out broad exemptions for national security purposes in existing regional AI legislation – including the EU AI Act and the Council of Europe (CoE) Framework Convention on AI. ECNL did an extensive review of jurisprudence to better understand how national security is defined legally and mapped the instances where it is used in the context of AI. Our [research](#) shows that the definition of national security is easily stretched and, as a result, states are invoking it to justify AI deployment in ways that evade regulatory scrutiny, particularly in surveillance and counter-terrorism, but also in other areas.

We used these research findings in our policy advocacy work, helping to address the gap on AI-specific regulation. We took part in the work of the CoE Steering Committee on Human Rights (CDDH) on a new [Handbook on AI and Human Rights](#), a practical guide for European policymakers and public authorities.

This is currently the first and only policy framework that clarifies how the existing human rights protections should apply in sensitive areas, such as developing and using AI for national security, where oversight is often weakest.

Acting as civil society representatives through the Conference of INGOs, we contributed to shaping the chapter on law enforcement and public security, ensuring that real-world AI uses – such as intelligence and identification services, crime prevention and investigation, counter-terrorism and other measures entailing surveillance of people and communications – are assessed against existing human rights standards. Looking ahead, ECNL will promote the Handbook with civil society organisations, national human rights institutions, local authorities and tech actors to help them embed its guidance in the lifecycle and implementation of AI for national security.



The difference this work made:

The adopted CDDH Handbook on AI and Human Rights was shaped by civil society expertise and included the recommendations put forward by ECNL.

The first policy framework is created that addresses the “national security loophole” in AI governance. This helps ensuring that European governments remain accountable to human rights obligations when deploying AI for national security purposes.

European governments, national human rights institutions and civil society organisations are better equipped in embedding human rights safeguards across the lifecycle of AI systems used for security purposes.

BUILDING CONNECTIONS BETWEEN CIVIL SOCIETY AND INVESTIGATIVE JOURNALISTS: THE CIVIC JOURNALISM COALITION



Together with European Digital Rights and Lighthouse Reports, we launched a space to protect people's digital rights and strengthen investigative reporting.

As governments increasingly close the space for civil society's work, expand surveillance, and use algorithms that reinforce discrimination, the need for investigative journalism has never been greater.

Journalists committed to exposing human rights violations tied to AI or spyware are often at great personal risk, facing harassment or even legal threats for their efforts. Similarly, civil society organisations also play a vital role in resisting democratic backsliding: they provide legal expertise, shape policy discussions and build advocacy networks. They amplify investigative findings and push for meaningful systemic change. However, despite their shared goals, the collaborations between CSOs and journalists are often cut short or limited due to short-term funding.

In response, ECNL together with [EDRI](#) and [Lighthouse Reports](#) created the Civic Journalism Coalition – a space where journalists, researchers and digital rights defenders can work together, reveal tech's impact on society and learn from each other. Our activities focused on three pillars:

- Learning: Throughout 2025 we hosted [workshops and training sessions](#) to exchange knowledge, tools and strategies between journalists and CSOs.
- Investigations: We provided seed funding for [six investigative collaborations](#), exposing digital rights violations, state and corporate surveillance, and threats to media freedom.
- Advocacy: We coordinated efforts to ensure investigations have a lasting impact by influencing EU policies and public debates.

As a result, we published [a practical guide](#) on how media and civil society can work together on investigations, hoping to inspire and support future efforts, extending beyond digital rights. We will also continue coordination with this network, as the relationships forged over the last year remain active.



The difference this work made:

The newly built community of 50+ professionals from media and civil society organisations led to impactful investigations.

Knowledge on issues of spyware, investigating big tech and using journalistic evidence in strategic litigation was strengthened.

CSOs and investigative journalists learnt best practices on how to collaborate, share evidence and coordinate investigations, enabling stronger reporting and more impactful joint advocacy.

MEANINGFUL INVOLVEMENT OF CIVIL SOCIETY IN THE AI LIFECYCLE

Civil society, especially marginalised groups, continues to be excluded from shaping how AI is designed and deployed. ECNL developed and tested a practical framework to ensure their genuine engagement.

Decisions about how AI systems are built are among the most consequential of our time. What values do they encode, whose concerns do they prioritise, what safeguards do they implement and which ones do they overlook? The people most affected by these systems are rarely present when those decisions are made, and typically consulted only once products are already built. As a result, power imbalances are reinforced rather than challenged. And AI developers, deprived of meaningful external input, produce systems that reflect a narrow set of perspectives.

The challenge ECNL set out to address was structural: there was no practical guidance on how to involve affected people in the design, development and deployment of AI systems in a way that produces real change. ECNL was determined to fill that gap.

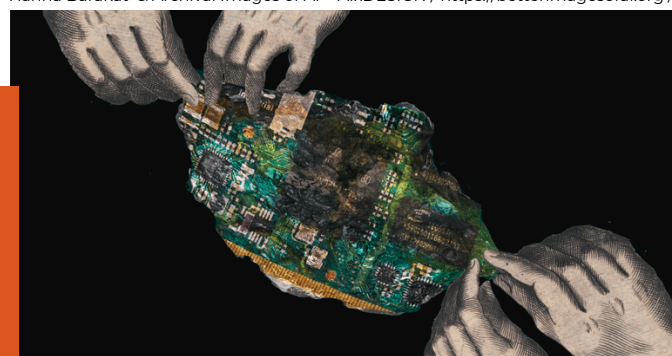
The [Framework for Meaningful Engagement \(FME\)](#) was developed from 2022 to 2025. It is a practical tool co-created with [SocietyInside](#), and over 300 individuals and groups from civil society, industry and the public sector across the globe. The approach is built around three conditions for meaningful engagement:

1. There needs to be a shared purpose that goes beyond the interests of the AI developer and reflects the needs of affected communities and the wider public.
2. The process should be inclusive and fair, bringing in a diverse range of stakeholders early enough that they can genuinely influence decisions.
3. Engagement should lead to visible impact, meaning that input is taken seriously, feedback is shared with participants, and contributions clearly shape outcomes.

ECNL did not leave the FME as a theoretical resource, and ran two real-world pilot projects to test the framework in practice, each in a distinct context and sector:

- The first pilot was a [partnership with Discord](#), a leading social media platform. ECNL worked with multiple teams within Discord to test whether the FME could guide the development of algorithmic tools for [online safety](#), with a focus on teens.

Hanna Barakat & Archival Images of AI + AIXDESIGN / <https://betterimagesofai.org/>



- The second pilot [partnered with the City of Amsterdam](#) as it developed “scan bikes,” an AI-powered image recognition service for public spaces. With ECNL’s support, Amsterdam designed a public engagement process that brought citizens into product design, leading to concrete system changes and increasing trust in the municipality’s willingness to act on feedback.

Both pilots confirmed the central insight that drives the FME: involving stakeholders early, from the stage when ideas are first being developed, rather than after a system is already built, increases the chance that their core values are built directly into AI systems. Lessons from the pilots fed directly into the [FME 2.0](#), published in November 2025.

ECNL is building an ecosystem of rights-based AI development: we actively connect AI developers and platforms with civil society organisations ready to engage meaningfully. Going forward, ECNL might conduct future pilots, focused on advanced AI systems such as agentic AI.

The difference this work made:

The first practical, rights-based framework for meaningful engagement in AI development provides structured guidance for how developers, public institutions and civil society can involve affected communities throughout the AI lifecycle.

Two real-world pilots validated that meaningful engagement is possible in both corporate and public-sector AI development, and can lead to concrete changes in AI design.

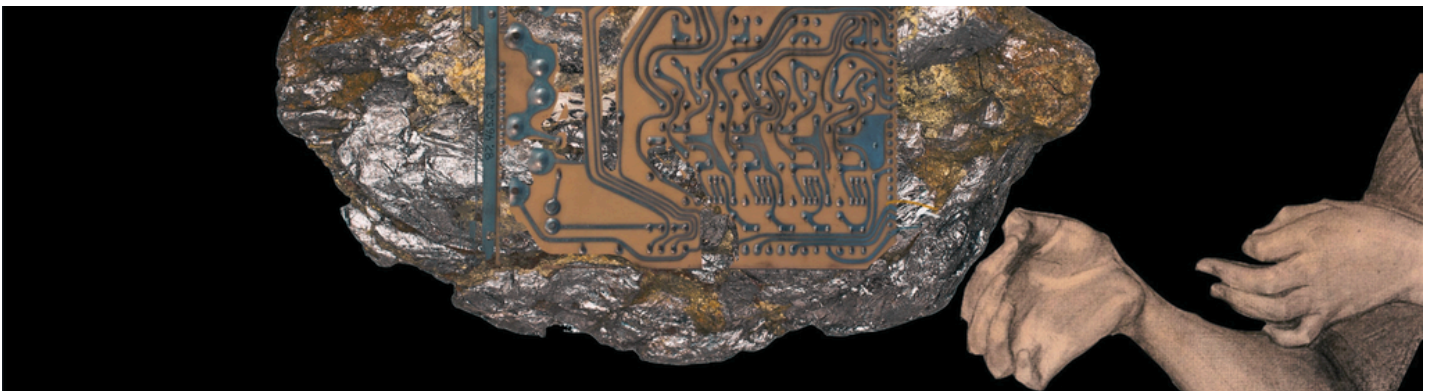
Contributed to shifting expectations in the AI field towards more structured and earlier involvement of affected communities.

ALGORITHMIC GATEKEEPERS: EXPOSING THE HUMAN RIGHTS RISKS OF LLM CONTENT MODERATION

As platforms turn to AI to moderate content online, ECNL published groundbreaking research on the human rights risks of large language models in shaping digital discourse and our democracies.

Content moderation determines what billions of people can say and see online. For years, platforms relied on human moderators to enforce their rules, and increasingly, on automated moderation. With the rise of LLMs, powerful generative AI systems are now used for tasks ranging from automated content removal to behaviour detection and user notification. Yet this shift has been happening largely without scrutiny, transparency, and without any known systematic assessment of what it means for human rights.

Hanna Barakat & Archival Images of AI + AIXDESIGN / <https://betterimagesofai.org/>



For civil society, activists, journalists, and marginalised communities, the promises of LLM moderation are appealing, but the risks are also alarming: content related to protests and dissident discourse is often underrepresented in the datasets LLMs are trained on. At the same time, the moderation power is concentrated in a small number of foundational AI models. Most platforms use pre-built LLMs rather than building their own. As a result, a handful of foundational models shape the public discourse at scale, with almost no democratic accountability.

ECNL responded to this challenge with a comprehensive, interdisciplinary research effort. We reviewed over 200 computer science and related academic papers and conducted in-depth legal analysis under international human rights law.

Our [Algorithmic Gatekeepers research](#) is structured around the specific rights at stake and the real-world harms LLM moderation poses to them.

ECNL's analysis finds that the most promising uses of LLMs in moderation are in procedural safeguards: assisting human moderators, triaging complex cases, generating clearer explanations of moderation decisions, powering faster appeals, and identifying systemic errors. Used well, these systems could make content governance more transparent and fair; but used as blunt removal tools, they pose serious threats to civic freedoms. The research has since been used by industry leaders and civil society, thereby informing both practice and policy. On the policy side, ECNL continues to advance regulation of advanced AI systems through its work on the EU AI Act implementation, the General-Purpose AI Code of Practice, and broader international standard-setting processes at the Council of Europe, the United Nations, and OECD working groups. The research directly informs these advocacy efforts, helping policymakers with rights-grounded understanding of how LLMs work.

The difference this work made:

Established the first comprehensive human rights analysis of LLM-based content moderation, helping define how these systems should be understood from a rights perspective across policy, industry, and civil society.

Shifted the debate on AI-driven content moderation away from efficiency narratives towards rights-based concerns.

Strengthened the case for using these systems to support human decision-making rather than replace it.

Informed ongoing policy and standard-setting discussions at EU, Council of Europe, UN, and OECD level, ensuring that emerging regulation reflects the specific risks of LLM-driven moderation systems on civic freedoms.

ECNL RESOURCES IN THE SPOTLIGHT

In 2025, ECNL published **57 updates, stories, resources and analyses** to protect spaces for action and inspire change. Together, these materials received over **53,000 visits** and **were downloaded more than 5,700 times**, showing continued interest in ECNL's research and insights. Some of the year's most impactful and widely accessed resources included:



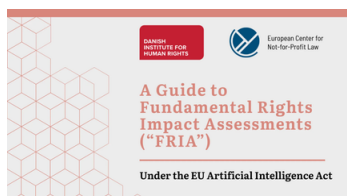
Research: The Future of Civil Societies

What are the trends and drivers that shape our world and the work of civil society? Read this [foresight paper](#) by James Logan written as part of ECNL's strategy development process.



ECNL's Learning Center

Our free, easily accessible learning platform with a unique layout, provides a variety of different tools, explainers, videos and resources on selected issues that affect civic space: technology & AI, security and counter-terrorism, participation, funding and philanthropy.



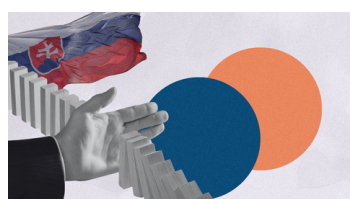
Research: A Guide to Fundamental Rights Impact Assessments

Developed by ECNL and the Danish Institute for Human Rights, this guide lays out a [clear roadmap](#) for putting FRIAs into practice meaningfully, as strategic tools for responsible AI use.



Video: Leaders Network for Environmental Activists and Defenders

Watch the video to find out how the LEAD Initiative advances the protection of environmental human rights defenders, and strengthens their participation in multilateral climate discussions.



News: Slovakia: Corporations unregulated while active citizens labelled as lobbyists

Slovakia proposed a lobbying law that pursued the same objective as an earlier foreign agent draft law - delegitimising and silencing critical voices. Our [analysis](#) demonstrated how the problematic provisions threatened civic participation and undermine public debate.

Top Outlets Referencing ECNL



OUR TEAM

We want to thank all ECNL colleagues who have supported this work in 2025: [Siham Alafoori](#), [Marianna Belalba Barreto](#), [Francesca Fanucci](#), [Katerina Hadzi-Miceva Evans](#), [Eszter Hartay](#), [Karolina Iwanska](#), [Brighton Mavhusa](#), [Esther Meester](#), [Emina Nuredinoska](#), [Simona Oggenovska](#), [Vanja Skoric](#), [Boglárka Szalma](#), [Andrea Judit Toth](#), [Judit Varga](#), [Maria Zilincikova](#), [Marlena Wisniak](#), [Jonneke van de Kamp](#), [Sushruta Kokkula](#), [Ivana Rosenzweigova](#), [Fulvia Trafeli](#) and [David Nichols](#).



OUR INTERNS

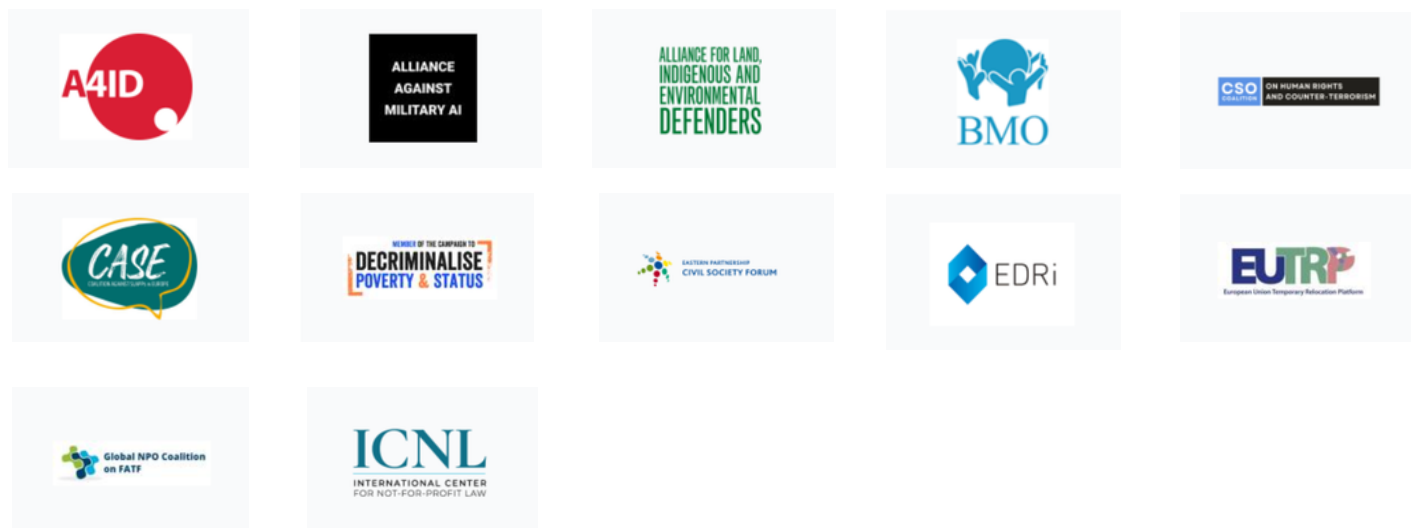
We are grateful to our fellows for their unique perspectives and contributions throughout the year: [Isabelle Anzabi](#), [Ana Sofia Harrison](#), [Maria Mihailov](#), [Martin Popper](#), [Ashwin Prabu](#) and [Lila Schwab](#).

OUR SUPERVISORY COUNCIL

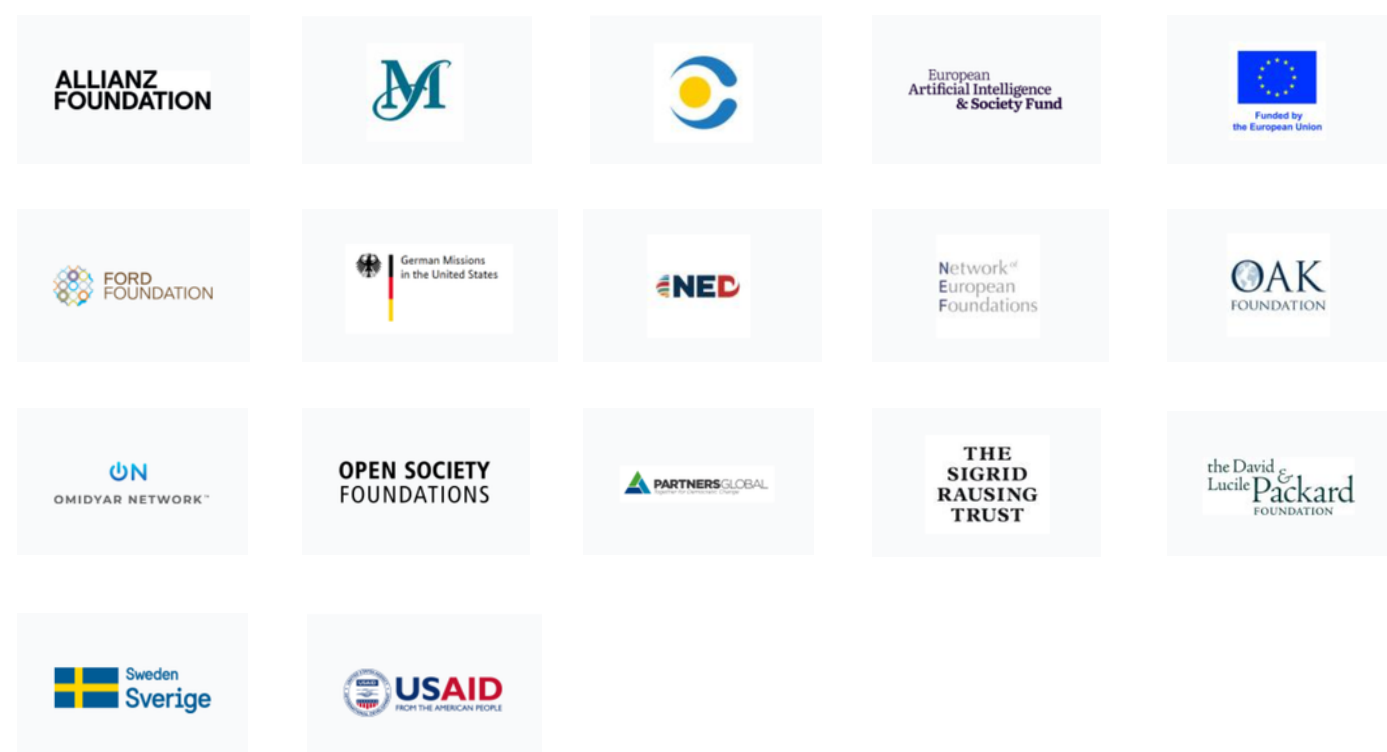
We are thankful to [Nelleke Hoffs](#), [Pia Tornikoski](#) and [Duncan Wilson](#) for providing independent oversight and strategic advice, ensuring that our work remains impactful, transparent and sustainable. We would also like to thank [John Clark](#) for his longstanding commitment, invaluable insights and dedicated service as ECNL's Board member over the past seven years.



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