

Networked Platform Governance: The Construction of the Democratic Platform

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Over the last several years, concerns about the credibility or trustworthiness of information online have been mounting. At the center of these concerns were questions about the role platform companies—particularly search and social media—should play in controlling access to information online. This article explores the ways that platform companies are trying to distribute the responsibility for content policy making to external stakeholders in response to concerns about their unilateral control and proposes that platforms are deploying a brokered form of *network governance* that presents opportunities for platform governance but also new concerns for accountability. Using a discourse analysis of public statements from platform companies, as well as corporate documents, it examines three ways in which platforms position their relationships with external stakeholder groups and communicate their relational power, to examine the ways in which the language of network governance is used to gesture toward inclusivity and participation in content policy making and to address resource and functional gaps when operating at scale.

Keywords: platform governance, platforms, Facebook, content moderation, trust and safety

We do not want to be the arbiters of truth ourselves, but instead rely on our community and trusted third parties
— Mark Zuckerberg (2016, para. 4)

On November 19, 2016, Mark Zuckerberg, founder and chief executive officer (CEO) of Facebook, took to his personal Facebook page to reassure his users that Facebook was taking misinformation spread seriously. Zuckerberg was responding to recent major events. The U.S. election had just taken place 10

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days prior, and Donald Trump, considered a long shot by members of his own party, had just been elected president. In Zuckerberg's public post, he stressed that Facebook should not be made the "arbiters of truth" of what constitutes "accurate content" (Zuckerberg, 2016, para. 2). Instead, Zuckerberg argued that this responsibility must be distributed to "our community and trusted third parties" (Zuckerberg, 2016, para. 4). In the months that followed, Facebook took steps to distribute this responsibility for assessing the truthfulness of news by establishing partnerships with fact-checking organizations to make content decisions on misinformation (Ingram, 2018). Ananny (2018) has made the case that this reliance on fact-checking organizations was an attempt by Facebook to leverage fact-checking partners' "different forms of cultural power, technological skill, and notion of public service" (para. 1).

But this has not been the only effort by Facebook, and by other platforms, to distribute responsibility for the development and enforcement of content standards making to external stakeholders and partnered organizations. At the user level, platforms have long incorporated user feedback to identify and "flag" potentially offending material though the relationships between flagging, moderation, and policy making have always been opaque (Crawford & Gillespie, 2014). Platforms also engage external stakeholders beyond user-level interactions, referring specifically to civil society organizations, experts, government agencies, and other specific community members (Helberger, Pierson, & Poell, 2017). Some platforms have institutionalized this outreach within the company's operations. Before its dissolution with Elon Musk's takeover of the site in 2022 (Mehta, 2022), Twitter had a Trust and Safety Council, established in 2016, which was composed of nonprofits, academics/researchers, and other grassroots organizations around the world (Twitter, 2017a), in addition to their global network of Safety Partners (Twitter, 2017b). Facebook has a team, Content Policy Stakeholder Engagement, which is specifically directed toward doing this kind of work, and they note that "gathering input from our stakeholders is an important part" of how they develop their content policies (Facebook, 2019, para. 1).² Facebook also has a Safety Advisory Board comprising "independent online safety organizations and experts" from around the world (Facebook Help Center, 2020, para 1). Twitch, a live-streaming platform used mostly by gamers, established a Safety Advisory Council, which consists of external experts and Twitch streamers who advise on content policies and procedures (Twitch, 2020). TikTok also recently added its own Content Advisory Council (Pappas, 2020) and Trust and Safety Council for Asia Pacific (Bettadapur, 2020). And Pinterest partnered with the National Association for the Advancement of Colored People (NAACP) for their Inclusion Advisory Council (Pinterest, 2020). These councils often exist to "advise" companies as they develop their "products, programs, and rules" (Twitter, 2017a, para. 1).

And yet, in rare reporting on the trust and safety councils or meetings between platforms and civil society groups, platforms have been criticized by external stakeholders participating in this process. In a letter written to Twitter's then-CEO Jack Dorsey by members of Twitter's Trust and Safety Council, council members criticized the social media company's approach to outreach and feedback, noting they had gone months without updates and "in some regions," council members were "unable to reach their contacts at the company" (Matsakis, 2019, para. 3). Though they say the council began strong for its first two years (2016–2018), signatories of the letter said that in its current version, "The Trust and Safety Council has eroded to practically nothing" (Matsakis, 2019, para. 6). Facebook has also been criticized in its exchanges

² According to Facebook (2012), the company has had a Safety Advisory Board since at least 2012.

by civil society partners. Organizers of the #StopHateForProfit Facebook advertising boycott referred to statements made by Facebook executives to civil rights groups in which they made several commitments to prevent the spread of hate speech on the site as “spin” and as part of a “powerful P.R. machine” (Isaac & Hsu, 2020, para. 5). Some of the leaders of this boycott who have been working with Facebook for years, such as the NAACP took this opportunity to criticize their interactions with the company more generally with Derrick Johnson, the NAACP chief executive saying the meeting was the “same conversation from the past two years,” with “no actionable steps” (Isaac & Hsu, 2020, para. 4). Despite this frustration, platforms are continuing to expand efforts to partner with outside organizations and individuals.

Platform companies, like Facebook, Google, and Twitter, have been repeatedly critiqued in the past for their unilateral approach to content governance and their lack of transparency around the setting and enforcement of content policies. They have been referred to alternatively as “private governance” (Caplan, 2021; Suzor, 2019), the “new governors of speech” (Klonick, 2018, p. 1), and “custodians of the internet” (Gillespie, 2018). Their importance within the current public sphere (van Dijck, 2012) has led scholars like Gillespie (2018) to implore platforms to “share the tools to govern collectively” (p. 212). But there has been little research examining whether, and why, platforms acknowledge the dynamic relationship that often exists between individuals within these companies and those from outside (Arun, 2022; Klonick, 2023). This article explores how platforms have spoken about their past efforts to distribute the responsibility for content policy making and enforcement, both to counter claims of centralized power and to address resource and functional needs required to operate at scale.

This article begins by explaining the relevance of the frame “network governance” (also referred to as networked governance and governance networks) to the field of platform governance,³ borrowing a concept used primarily by scholars in political science and organizational theory to describe a governance framework that works to leverage fields of interdependent (though autonomous) actors (Sørensen & Torfing, 2005). This is followed by a section outlining the reasoning for the methodology and data sources for this project—discourse analysis of public statements—as a way to examine *why* platforms are brokering governance networks for content policy making. The analysis explores how governance networks are, according to platforms, being used to address legitimacy concerns, resource gaps, and complex problems of operating at scale. This article concludes by presenting new questions and concerns that emerge for platform accountability as platform companies embrace the discourse (and occasionally, practices) of network governance.

Platforms as a Node: The Current Era of Network Platform Governance

The phrase “platform governance” has emerged over the last several years to refer to the governance *of* and *by* platforms (Gillespie, 2017; Gorwa, 2019). By “platforms,” I refer to those sites and services that share features such as the capacity to “host, organize, and circulate users’ shared content or social interactions for them,” without producing the “bulk of that content,” that are based on data and infrastructures for data production and analysis, and that moderate content (Gillespie, 2020, pp. 14–19).

³ Since beginning this research, Cohen (2020) has also published on the relevance of networked governance to digital platforms, as well as the concerns it presents for platform governance and accountability.

Governance with respect to platforms has been interpreted quite broadly by scholars such as Gorwa (2019), and Suzor, Van Geelen, and Myers West (2018) referring to all “organized efforts to manage the course of events in a social system” (Burris, Kempa, & Shearing, 2008, p. 3). This can include governance *of* platforms through the policies and regulations implemented by a political system, such as the Digital Services Act, passed by the European Union, which creates rights and obligations for online service providers, including platforms (Morar & Santos, 2022), as well as other voluntary compliance mechanisms like the Global Network Initiative (Gorwa, 2019). But it can also mean governance *by* platforms, or the myriad ways platforms govern their users, through terms of service and privacy policies, content policies and content moderation, and user interface (and other architectures). It can also mean governance *through* platforms, which includes the robust systems of community moderation and management occurring over (and sometimes facilitated by) platforms (Grimmelman, 2015).

Theories of platform governance have tended to emphasize unilateral or unidirectional forms of control and influence; for instance, there has been a “broad consensus” as noted by Dvoskin (2022) that platforms “exercise oversized power” and have, in many ways, replaced the role of the state in regulating speech (p. 3). These theories are put forward alongside calls to action to “share the tools to govern collectively” (Gillespie, 2018, p. 212), recognizing both a demand to make these rules accountable to the public and that the *power to govern over platforms*, as described above, is, in many ways, already shared among platforms, users, and states, though often unequally (Helberger et al., 2017).

On its surface, the myriad ways in which platforms try to engage external stakeholders appear to be an attempt to heed this call. However, there is currently a theoretical gap in how we make sense of these arrangements. They exist outside of formal self-regulation, a process “in which rules that govern market behavior are developed and enforced by the governed themselves” (Latzer, Just, & Saurwein, 2013, p. 376), because many of these efforts to engage stakeholders, though not all,⁴ are being used only to advise the creation or application of rules (or the infrastructure of the platform) without the power to regulate. This broad consultation of civil society organizations in the development of content policy has been noted by both Dvoskin (2022) and Suzor (2019), who highlight the role civil society organizations can play in representing the interests of their various stakeholder groups (and the public interest in general). As Dvoskin argues (2022), regulators have even designed *their* mandates (such as the Digital Services Act) to require companies to consult with these organizations.

So how do we make sense of the many ways that platforms are already engaging stakeholders such as civil society organizations and academics where input is solicited and access to information is more heavily controlled (by the company)? This article recommends that we look at the concept of *network governance* to better understand these policies and practices. Network governance (also referred to as networked governance or governance networks) is a concept that has been articulated within political science to refer to the growth (or recognition of) forms of governance that work to leverage fields of

⁴ In his article Medzini (2021) puts forward several examples of what he refers to as “enhanced self-regulation” (p. 2227), such as the Global Network Initiative, as well as Poynter’s involvement in Facebook’s fact-checking program. In these cases, there are rule-setting mechanisms that are available to intermediaries.

interdependent (though autonomous) actors, coordinate or allocate resources, make decisions, and achieve organizational goals (Provan & Kenis, 2007; Sørensen & Torfing, 2005). Though governance networks, as described by Sørensen and Torfing (2005) contrast with more hierarchical forms of governance, such as state rule, and are an alternative to strict market competition, Provan and Kenis (2007) have argued there are various forms of network governance that can be "categorized along two different dimensions" (p. 233). On one extreme, a network may be governed completely by the interactions among the organizations that comprise the network, resulting in shared governance. At the other extreme, the network "may be highly brokered, with few direct organization-to-organization interactions" (Provan & Kenis, 2007, p. 234). In the mid-range, they argue, "a single organization may take on key governance activities, while leaving others to network members" (Provan & Kenis, 2007, p. 234). This third form can be an externally governed network (what they refer to as a Network Administrative Organization or NAO), wherein the organization sets up a separate administrative entity for the "exclusive purpose of network governance" (Provan & Kenis, 2007, p. 236). This NAO can be established by network members or mandated (resembling, e.g., The Facebook Oversight Board). Provan and Kenis (2007) argue that each form of network governance has its own particular strengths and weaknesses, and potential outcomes are dependent on several different contingencies (such as network-level coordinating skills), competencies, and types of demands.

As a concept, governance networks are not new. They have been a subject of interest in political science since the 1990s, corresponding with interest in the "network paradigm" with the rise of the Internet and the "network society" (Castells, 2000; Lim, 2011). They emerged at the same time that political scientists began to trace a transition away from theories of "government" toward "governance," which marked a turn away from theories of formal governing by the state, toward the influence of other entities—private corporations, markets, multinational agreements, and other forms of distributed decision making (Puppis, 2010). The term is used to bridge a conceptual gap between the traditional, hierarchical government model, with rigid command-and-control procedures and bureaucratic systems, and the complex public-private neoliberal model that has developed, which frequently outsources capacity and is oriented toward organizing resources (Eggers, 2008). Network governance is related to but different from similar concepts such as "multistakeholderism," which has been referred to by Internet governance literature as "two or more classes of actors engaged in a common governance" characterized by "polyarchic authority relations constituted by procedural rules" (Raymond & DeNardis, 2015, p. 573). In multistakeholderism, stakeholders can include a range of state and non-state (including state, firm, and civil society) actors with an interest (or "stake") in a change, and who "control relevant information and resources and whose support is needed to implement the change" (Algica, 2006, p. 79). Though multiple stakeholders are involved in network governance, these actors do not necessarily have access to the same information and support, instead, they are characterized by differences in access to information, methods of communication, and motivation (Huppé, Creech, & Knoblauch, 2012). As noted by Chan Chin and Changfeng (2017), multistakeholderism is also criticized for failing to address the power relations of actors that characterize these discrepancies in access. In contrast, network governance places a focus on how policies are "shaped and reshaped through practices of negotiation between interdependent actors" (Sørensen & Torfing, 2005, p. 197).

In their article on governing online platforms, Helberger et al. (2017) describe a paradox in the allocation of responsibility in the management of potential risks in platform governance. They argue that

the current focus in law “on allocating responsibility to one central party is primarily due to the fact that this central actor is the source of potential risk or harm, or the controller of a resource that can give rise to legal responsibilities” (Helberger et al., 2017, p. 2). They argue that platforms present a problem for this allocation of responsibility, referring to the “problem of many hands” as coined by Thompson (1980), which refers to a situation in which different entities contribute in different ways to a problem (p. 905)—such as the liking or sharing of “contentious” content on a platform that is designed to respond to these signals as a measure of quality or importance (Caplan, 2018)—or a solution (the moderation of that content), in a way that makes it difficult to identify who is responsible. However, though Helberger and colleagues (2017) conclude that a notion of *cooperative responsibility* must take shape in response, the use of the frame of network governance enables us to see *how* this collectivization has taken shape as directed by platforms.

Network governance provides a lens through which to begin answering these questions. The phrase builds on theories from new institutionalism and organizational sociology (DiMaggio & Powell, 1983), taking as its starting point “the demise of the isolated and sovereign actor or organization” and places an emphasis on “understanding interaction” between interdependent actors and organizations (Bogason & Musso, 2006, p. 4). Though it can be interpreted positively in terms of its polyarchic potential to enable more “cooperation, flexible responses, and collective social production” (Bogason & Musso, 2006, p. 6), it also does not take only one form, with some modes of network governance (shared governance) being more emblematic of those values than those carefully controlled by a lead organization (Provan & Kenis, 2007).

Governance networks are not necessarily legal entities; they are often not bound by formal contracts—though they can be, as in the case of NAOs—but rather develop from cooperation toward a common goal, sharing resources, and information (Provan & Kenis, 2007).⁵ This article seeks to understand why platform companies look toward network forms of organization—although a highly brokered form—in the development and enforcement of content policy making. It examines the stated claims of the representatives of platform companies tasked with the brokering of these governance networks, through the frame of the tensions of network governance that have been articulated by scholars like Bogason and Musso (2006), Powell (1990), Provan and Kenis (2007), and Sørensen and Torfing (2005): Efficiency versus inclusivity, internal versus external legitimacy, and stability versus flexibility in addressing resource and functional needs.

In the statements given by platform representatives as to why they are turning to network governance, it is important to keep these *tensions* in view. Though, according to its proponents, network governance can provide opportunities for platform-policy making and can increase the diversity and expertise of those contributing to decisions (Bogason & Musso, 2006), it can also lead to “burn-out” among network members; throughout the literature on networks, compiled by Provan and Kenis (2007), there is a common theme of the need to build trust among network partners, which is often resource intensive. This tension can be exacerbated by a tendency, according to network governance scholars such as Fischer (2006), for networks to favor those already in power, in this case, who have access to technology companies. There also exists a tension between the use of the network for external legitimacy (a seemingly united face for problems to build credibility) and the need for internal legitimacy among

⁵ Levi-Faur (2011) has demonstrated, however, that networks can often become more formalized.

network participants (such as an organization feeling as if their contributions are only geared toward this external legitimacy). Related to this *tension of legitimacy* is that decisions made by networks also become more decentralized, placing them even more outside public view (Bogason & Musso, 2006), creating more channels of political influence with potentially unevenly distributed access (Sørensen & Torfing, 2005). Lastly, though network governance can help organizations maintain flexibility and address resource and functional needs, it may also lead to less insight into how final decisions are made and a situation where “no one is in charge” (Stoker, 2006, p. 52).

Method

Platforms are increasingly creating partnerships with external stakeholders to inform parts of their content policy making. Examining how these partnerships unfold in practice can, however, be difficult, given the broad range of both formal and informal partnerships (from a side conversation between a platform employee and an expert to a trust and safety council, trusted flagger programs, and teams dedicated to external stakeholder engagement). It has also become more difficult to access platform companies to conduct research, and platforms have good incentives to limit access to their data (Bruns, 2019; Shapiro, Sugarman, Bermejo, & Zuckerman, 2021). For this reason, this article relies on publicly available statements from the representatives of platform companies responsible for developing or implementing network governance practices in their content policy development. Because of this limitation on accessing publicly available statements, the goal of this research is not to examine the effectiveness of network governance practices but rather to understand, from the perspective of platform representatives, the role network governance plays within content policy making and enforcement. The statements made by these representatives can be seen as both “performative and functional” (Rapley, 2008, p. 2), working to guide and shape perception of their programs of outreach and their response to critiques of unilateral and unidirectional control of content policy. As Hoffman, Proferes, and Zimmer (2018) have argued, studying the public discourse of key representatives speaking on behalf of platforms is particularly important because these messages can “feed into broader discourses about a technology” (p. 201) that can then influence beliefs and perceptions about these companies held by the public. Paying attention to how these representatives deploy the rhetoric of network governance can thus tell us how platforms seek to position themselves—their relative power and responsibility—in relation to networked actors. In future work, this discourse must be studied in relation to how these networks take shape and the degree to which platform companies carefully broker their relationships.

This project uses public statements made by platform representatives, corporate blogs, and platform community guidelines. In particular, I relied on statements made by platform representatives during the Content Moderation (COMO) at Scale conferences, a conference series oriented toward industry, academia, and civil society on the challenges of moderating user-generated content at scale. There were four conferences in total, and I focused on the first two conferences, the first held at Santa Clara University University Law School in February 2018, and the second, at the Washington, DC, conference hosted by Eric Goldman on May 7, 2018. These conferences were chosen, over others such as Sarah Roberts’ All Things in Moderation conference held in 2017, because of the number of different platform representatives on platforms, the organizational focus of the panel topics (Under the Hood and Overview of Company Operations), and because the entirety of the conferences (transcripts and videos) were made publicly

accessible (Bickert, 2018; Goldman, 2018). Across these two conferences, representatives from 16 different platform companies spoke on panels about topics related to content policy, internal organizational structure, and external engagement. This included representatives from Automattic (parent company of WordPress), Dropbox, Facebook, GitHub, Google, Match.com, Medium, NextDoor, Pinterest, Reddit, TripAdvisor, Twitch, Twitter, Vimeo, Wikimedia, and Yelp. Relying on these public statements meant that I could include comments from a broad range of platforms and assess how this unfolds across the platform industry. Representatives from the platforms at the conferences delivered 10-minute statements about their operations, and in some cases, prepared a Powerpoint presentation of their organizational dynamics (showing workflow diagrams and organizational charts). Following these statements, these conferences had a discussion guided by a moderator as well as an audience question-and-answer session. In total, I analyzed approximately 222 excerpts presented by these representatives, using a thematic analysis, by reading through transcripts of panels searching for excerpts about networks, looking for language about partnerships, stakeholder engagement, consultation, inputs on policies, and feedback. I grouped these statements with an orientation toward the goals and tensions of inclusivity and participation, distributing responsibility for policy making, and the need to address resource and functional needs. I paired these public statements with other publicly available documents that discussed partnerships and external stakeholder engagement, such as community guidelines, corporate blogs, and other statements made by representatives from platform companies in public interviews, as well as trade press and other secondary coverage of platform partnerships. In my analysis, I paid particular attention to how platform representatives framed these relationships within company operations, and how they framed the company's own role in relation to external stakeholder engagement.

Findings

In the public statements I studied, platform representatives discussed both formal and informal modes of engaging external stakeholders within the context of their company's operations and decision making. As the next section will demonstrate, in their public statements, I found that platforms invoked governance networks strategically, as a way to distribute responsibility for content policy making (while locating themselves as a central, brokering power within this network) and address both concerns about a lack of inclusivity and diversity with their decision making (often invoking older concepts within media policy) and resource and functional needs when operating at scale.

Metaphors of Governmentality and the Representation of the Public Interest

Involving the community and distributing more responsibility for policy making or enforcement to third parties is often framed by companies as part of a platform company's governance structure and within their normative ideals. In this sense, they tie outreach and feedback as part of the process of giving a "voice" to their users and the community (Zuckerberg, 2018), as part of their transparency efforts or as part of their broader governance processes and procedures. However, many of the statements given by platform representatives demonstrated that though the company was willing to engage with external stakeholders and consider feedback, the process of this feedback would be centralized, with the company in control. In this sense, this language allows platforms to position themselves as a central actor within an

assemblage of interventions in content policy, breaking down “the platform” as a singular source of monolithic and unilateral power.

At both the of the COMO conferences studied, and in other interviews and reports (Caplan, 2018; Klonick, 2018), platform representatives often framed themselves in governmental or judicial terms. For instance, the director of Policy for Reddit has referred to Reddit as a “federal system,” in how they distribute powers between the company’s baseline rules and the rules developed by communities (or subreddits; Ashooh, 2018, 01:09:56). Reddit has also referred to its community team as its “diplomatic corps,” which is responsible for engaging moderators and identifying and resolving issues before they become a concern. The head of Legal for Medium, a longer-form publishing platform, referred to their system as a “common-law system of precedence,” where “insights you derive from hard cases are up taken into your policies,” in conjunction with consultation with “outside experts, and eventually . . . executives” (Feerst, 2018, 00:53:11). The general counsel for Automattic agreed with this portrayal, noting platforms “want to be clear with our users about what is and is not allowed . . . but in the application of those rules, there are always going to be edge cases” comparable with “legal systems with statutes and decades of case law” (Sieminski, 2018, 01:55:22). The use of terms like “precedent” are also becoming increasingly common as platforms formalize their policy processes (Harris, 2019). Representatives of Facebook have also used similar terminology in their description of the process used at Facebook, describing the process of input into policies at a large biweekly meeting held at the company, as a “mini-legislative session” where input is considered from teams inside the company, as well as from external experts on issues such as “child safety” (Bickert, 2018, 00:29:44; Stern, 2018, 00:47:54). Differences in metaphors were notable because of how they reflected the size and resources of a platform, mapping onto other research by Caplan (2018), which noted differences among platforms (artisanal, community-reliant, and industrial) in their approaches to content governance.

Read one way, the use of governmental metaphors (Lakoff & Johnson, 1980) hints at the ways that platform representatives, often trained as lawyers, and operate within trust and safety departments housed within legal departments, often frame their relationships with users in legal terms, for legal audiences. The boundaries between legal requirements for takedowns and normative or ethical standards (often referred to as “community guidelines”) are blurred by platform representatives, hinting at the ways that incorporating feedback from experts and academics is used to bridge these jurisdictional divides and expertise. Legal and policy teams are often closely related in platform companies, often acting in coordination or with policy teams structured within legal departments. For smaller companies, like Medium, platform representatives specified that content policies are informed by “the legal risk that provides the underlying backdrop for this, but then on top of that, we all have our various policies” (Feerst, 2018, 00:49:51). Reddit specified that “policy reports to the General Counsel” with its legal team “as a stakeholder in this process” (Ashooh, 2018, 01:11:29).

In the frame of network governance, platforms are appealing to the language of government to locate their participation within this process. Within that frame, the use of this language seems less of an allusion to a private form of government for speech concerns (Caplan, 2021) than an acknowledgment that both within the company and in its dealings with external actors, it considers feedback and opinions but ultimately holds more centralized control. Platforms may also be using this language to frame these interactions of balancing this tension between inclusivity and efficiency (Provan & Kenis, 2007)—building on

legal concepts like *precedent* and *common law*, as well as American values such as *federalism*—to convey to outside actors that decisions are fair and legitimate.

Bureaucracy as Democracy: "A Voice but not a Vote"

Platforms gesture toward other normative values in how they interact with stakeholders as part of the policy-making process, often leaning on *democratic* and *liberal values* such as *participation*, *consensus building*, *freedom of expression*, and *transparency*, building off older concepts in communications policy (Napoli, 2001) to suggest that the processes of content policy making in platforms are open for public debate. Terms like "consensus-building" were used to build off procedures underpinning the governmental structures (such as the "mini-legislature") described above (Bickert, 2018, 00:29:44). Wikimedia also used the term to describe the more distributed process of decision making that happens in each Wikipedia, each governed by teams of volunteer administrators and editors, who "enforce the rules they come up with based on consensus" (Rogers, 2018, 01:18:34). Other companies, like Vimeo, also noted that they operate in accordance with "consensus building within the broader moderation team," emphasizing that decision making first exists at the level of the "individual moderator," with difficult-to-decide cases or new issues triggering internal conversations over Slack or in the office ("we will spin our desks around"; McGilvray, 2018, 00:59:19). In each case, platforms emphasized consensus building was important for the development of new content rules and policies and to understand how existing policies should apply in difficult-to-decide cases.

Similarly, participation from both internal platform employees and external actors was also framed as part of the governance process. GitHub has a policy of "open sourcing" their policies under a creative commons license and inviting their users to "make direct contributions to our policies," which was framed as part of a policy of "community governance" and as a way of encouraging openness and transparency in how their legal team "engages with those contributions from users" such as questions or comments on policies (Niv, 2018, 00:12:13). Participation is also framed as a process of "feedback" from a range of stakeholder groups. According to Pinterest's representative, content policies "draw upon feedback from our public relations team, subject-matter experts . . . industry standards. We also get a lot of feedback from legal" (Cai, 2018, 01:00:47). For companies like Twitch that, like YouTube, rely on user-generated content from "creators" who may receive revenue from the site, there are special mechanisms of feedback for this user group, who "directly" give feedback to Twitch employees who work to "captur[e] their concerns" (Keen, 2018, 00:44:24). But there are also clear limits to this participation, which were noted by some representatives. As the former vice president of Trust & Safety at Twitter described "contributors," (see Figure 1) the "public policy, T&S council, User Services, and other external subject-matter experts" as the "lifeblood of this process" but also noted they have a "voice, but not a vote" when it comes to setting content policy (Harvey, 2018, 00:22:46). Their role, as she proceeded to describe, is to be a "subject-matter expert" and work both internal and external to the organization and give input on particular topics (Harvey, 2018, 00:23:46).

In this sense, bureaucracy—that is, the administrative system used within any large institution that is characterized by rules and procedures—was often framed in participatory and democratic terms. Medium explained this process within their procedures of "escalation" when dealing with something "complex in

terms of content . . . [or] legal implications” (Feerst, 2018, 00:52:27). In his explanation of how escalation works within the company, he also said that “there is a sort of Socratic thing that happens in which people will argue for or against certain positions . . . eventually that will come to a vote” (Feerst, 2018, 00:52:27). Though the democratic process was often integrated into how platform representatives spoke about the decision-making process in their companies, these were often subsumed into larger organizational processes. As Medium’s head of Legal acknowledged, “I as the company’s lawyer will have more to say about it,” noting that the company will “consult outside experts, and eventually, our executives all weigh in on it” (Feerst, 2018, 00:53:11). This process of feedback can become quite complex (see Figure 1).

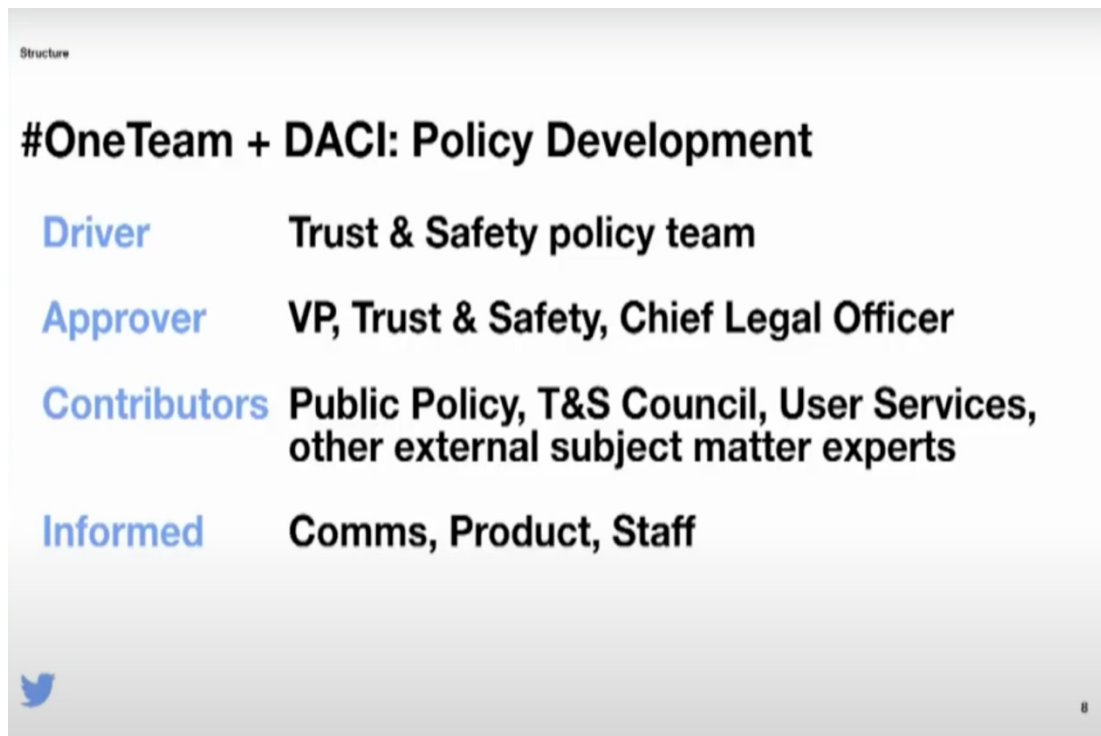


Figure 1. Presentation by Del Harvey, at the COMO at Scale Conference, Washington, DC (Harvey, 2018).

As part of participation, “diversity” was emphasized. Though it was occasionally used to refer to the demographic characteristics of those doing this interpretive work (or “cultural competencies” as was stressed by Medium’s head of Legal), it was often used to refer to “diversity of opinion” (Feerst, 2018, 00:51:37). A representative for Twitch noted that the company’s process of feedback, and the international makeup of Twitch creators, helped increase “diversity of opinion” on policies, referring both to the range of stakeholders consulted (such as “creators” and international users) and then different interpretations of content (Keen, 2018, 00:44:38). A desire for “different viewpoints” was also cited by Twitter in 2016 in their plans to expand their Trust and Safety Council beyond 40 members (Twitter, 2016).

Companies also referenced the importance of transparency in how they made and enforced content policies, highlighting its use as a tool to communicate decision making with partners and users. In some cases, transparency was referred to as a value or a goal that oriented a company's operations. The representative from Dropbox noted that "operating in a transparent way" is part of its "core value," which is "to be worthy of trust" (Dean, 2018, 00:11:39). Speaking on behalf of Google, one representative referred to transparency as "a huge goal, whether it is talking about content policies or our legal removals team" (Puckett, 2018, 00:42:10). Transparency was also cited as a *tool*, with a number of platforms noting their partnership with Lumen, a project from Harvard's Berkman Klein Center that "collects and studies online content removal requests," (Berkman Klein Center, 2017, para. 1) as part of their transparency efforts (Puckett, 2018, 00:42:59), and "transparency reports" in general (used by Google, Pinterest, Reddit, and Facebook). The extensive use of the term transparency, and the creation of documents like "transparency reports" by platform companies, also signals that these companies are trying to build on ideals of openness and access (and potentially involvement by the public) to establish trustworthiness to external actors (Ball, 2009).

Addressing Resource and Functional Needs Operating at Scale

When platform representatives discussed their relationship with external partners, they stressed the role these partnerships were playing in addressing resource and functional needs. Partnerships with outside experts are often driven by a recognition by the platform that platform employees do not, and cannot, "know everything" (Harvey, 2018, 00:29:58). In many cases, these relationships remain *informal*, between individual actors in platform companies and people "they know or who have been recommended" (Harvey, 2018, 00:23:46). This outreach seems to be bound with the need for platforms to address not only issues at scale but also past concerns that they acted *too quickly* before considering the effects of the technologies they were building, or even *who* the communities were that were impacted. As Twitter's representative explained,

By partnering with others, by being really open to the feedback that we get, or to the issues that are raised to us, it makes it a lot easier to not only act quickly and as accurately as possible, but also to build relationships in good faith between us and people who maybe had assumed we didn't care, or that we weren't listening. (Harvey, 2018, 00:29:58)

Platform representatives stressed an awareness of the "limits of our expertise," and accordingly, whether they should be making decisions in these areas (Sieminski, 2018, 01:49:15). Often, the need to bridge gaps was due to issues of scale—most platforms operate globally, but with teams primarily located within the United States or just with small teams. As the representative from Medium noted, "we are small, but we are global . . . the internet shows up everywhere" (Feerst, 2018, 00:50:39). Though Medium tries to hire individuals with additional languages and "cultural competency," they also address any gaps through partnerships and other "outside resources to deal with all the various countries we are displayed in, the jurisdictions we're working in" (Feerst, 2018, 00:50:39). Vimeo, another small platform that nonetheless operates globally, also expressed some difficulties with addressing language gaps, noting that when no one on his team speaks the language of flagged content, they look for "context cues . . . [like] swastikas," but they also "find experts or subject language experts within the company or within third parties that we contract" (McGilvray, 2018, 01:03:46). In cases where platforms rely on volunteer moderators, such as with Wikimedia and Reddit, they stress the benefit of having volunteers moderating their own communities

because of this capacity to apply “local knowledge and local context” (Rogers, 2018, 01:25:18). In other cases, where moderators are U.S.-based, the importance of having moderators that can apply “local expertise” is still stressed by platforms like Yelp (Schur, 2018, 01:51:25). For companies like TripAdvisor, who operate globally, being able to have “representation for each of the languages” spoken on the site, as well as “that local perspective,” is an important element in deciding whether content should be published or reviewed (Foley, 2018, 00:13:02).

Platform representatives often use partnerships they form with outside organizations that are subject-matter experts on particular topics or for particular concerns. Pinterest, for instance, works with groups like the National Eating Disorder Association (as well as the World Wildlife Foundation, Koko, National Network to End Domestic Violence, and LegitScript; see Figure 2), which it uses when it does not have “specific expertise in certain areas” (Cai, 2018, 01:04:45). Facebook also has a Safety Advisory Board, which the company consults on issues related to online safety (Facebook Help Center, 2020). This global group of nonprofits, which includes (among others) organizations such as an India-based women’s empowerment nonprofit called Center for Social Research, the UK-based Childnet International, the National Network to End Domestic Violence, and an Australia-based movement against bullying called PROJECT ROCKIT, provides “expertise, perspective, and insights that inform Facebook’s approach to safety” (Facebook Help Center, 2020, para. 1) Speaking on behalf of Facebook, one representative noted the value of outside experts as “it’s not as simple as saying ‘we don’t allow bullying.’ You have to have a lot of granular guidance into what bullying is. What we find useful is to engage with the expert groups on a particular topic” (Bickert, 2018, 01:54:18).

Partner with experts to drive better standards



Confidential

4

Figure 2. Presentation given by Pinterest, at the COMO at Scale conference in Santa Clara, California (Cai, 2018).

In some cases, this partnership gets embedded in the policies and practices of the company. This has been the case with “trusted flagger” programs, for instance, on YouTube, which are individuals or organizations that seem “particularly effective at identifying policy-violating content” and are given “more robust tools, like bulk flagging mechanisms” by the company to help identify content (Puckett, 2018, 00:41:12). Facebook undertook a similar effort with its fact-checking partnership, providing fact-checking organizations that have been certified by a nonpartisan fact-checking organization (Ananny, 2018), with tools to identify and review potential false news over the network (Facebook, 2021).

The need to integrate the context of the underlying thread was referenced by companies when explaining why *humans and their social and cultural relationships*, not *machines*, were needed when making content governance decisions. Companies repeatedly referred to various steps they took internally to introduce this context. For Twitch, human moderation was necessary because “machines really can’t get . . . all the layers of context,” as the “machine would have to know gaming culture and language, they would need to know the references in that history . . . the meaning of emotes” (Keen, 2018, 00:45:29). Wikimedia’s more distributed governance structure, in which each local language community sets and enforces rules that are developed based on consensus, means that the site is quite tailored to “local knowledge and local context” (Rogers, 2018, 01:25:18). For most platforms, the problem of context was used to explain the limitations of automation in content moderation and the importance of “the human” whether inside the company or outside (Ashooh, 2018, 01:15:29).

The need to address context concerns—in terms of language, culture, and expertise—has played an important role in content policy making in the platform era. At the COMO at Scale conferences, the need to address context became a rallying cry used in conjunction with an acknowledgment by these technology companies that there is a need to reinsert (or acknowledge) the “human” and guard against the overuse of machine learning and automation when it comes to content concerns.⁶ This was stressed time and again by platform representatives by pointing out that technology could be used to “flag something that *might be* violating” but that a person had to be there “to make the determination about whether that *is* violating” (Bickert, 2018, 00:26:56). This was stressed even by representatives from Facebook, who noted that “limitations on the context that we have available means we can’t just use technology straight out to do a lot of this work,” (Bickert, 2018, 00:29:44) despite claims by Mark Zuckerberg, Facebook’s CEO and founder, to Congress that artificial intelligence will solve content moderation concerns. But for people *in* platform policy, using humans to pay attention to context was seen as the only way to grasp the “complexity of human expression” and to treat complaints with “humanity and dignity” (Feerst, 2018, 00:47:27). Despite not often having moderators in every space where they operate, platform representatives often spoke of overcoming these context limitations by conducting activities like “cultural context trainings” (Harvey, 2018, 28:06), hiring people who speak the languages of users being moderated (Stern, 2018, 00:58:01), or using “outside resources” such as partnerships with academics and civil society actors (Feerst, 2018, 00:50:39) For Reddit, a company that relies on volunteer moderators, “moderators are empowered to make their own rules,” which means that “cultural customization is built into the system” (Ashooh, 2018, 01:50:54). In this sense, network

⁶ This concern, that there are limits to what machines can do when it comes to the interpretation of messages, was additionally the theme of another panel presentation that was not studied here.

governance serves as a way to address context as a dynamic feature of the moderation process to overcome the rigidity of computational systems to become more responsive to the different social settings in which they are used (Dourish, 2004).

Discussion and Conclusion

On December 12, 2022, months after taking the company completely private, Elon Musk decided to dissolve Twitter's Trust & Safety Council, which had been a model of network governance for the industry (Mehta, 2022). The group was formed in 2016 and was disbanded through an e-mail, with group members being told that the council is "not the best structure" to receive inputs into product and policy strategy (Mehta, 2022, para. 2). That Musk was able to end this body's operations so unceremoniously highlights the contingent nature of the way network governance is deployed by, at least parts of, the platform industry. This article does not address all the power dimensions at play but simply aims to highlight the role platforms say these relationships play within the development of policies.

Using the lens of network governance not only enables us to locate the activities platforms are already undertaking but also helps us frame questions about the degree to which they actually represent a sharing of governance or another highly brokered form amounting to a minimal shift from what existed previously in terms of both operations and public perception. As these platform companies have assessed, network governance provides certain opportunities for policy making. Proponents of network governance argue they can increase the diversity and expertise of people contributing to decisions about policy (Bogason & Musso, 2006)—which, for the technology industry in particular, has been a major concern (Harrison, 2019). Networks can also insert "more negotiated or deliberative models" of decision making into what was previously done wholly hierarchically within the company or agency (Bogason & Musso, 2006, p. 5), and they can increase the responsiveness of internal policy teams to content issues that pose problems for local communities (Algica, 2006).

But criticisms of versions of network governance that resemble the types that platforms deploy also indicate how this model, when governance is not actually shared, can introduce new problems of accountability. For instance, relationships between a central and networked actor can increase the complexity of decision making, making it impossible to understand or evaluate the relative influence of experts or interest groups in decision making (Tuebner, 2009). A lack of visibility regarding how feedback is incorporated can veil how interest groups (including the platforms themselves) work to maximize their own organization's goals over the mission of the network. As noted by Tuebner (2009), network governance, depending on how its instituted, can lead to issues like information abundance, coordination concerns, communication issues, and asymmetric power relations, and opportunistic behaviors. Cohen (2020) has also articulated the many problems that can occur with the rise of networked power, particularly as it enables digital platforms to exercise "enormous power outside the limitations of traditional constraints" (p. 58).

In the case of platform companies, a lack of access to or insight into this process is by design; trust and safety councils do not work publicly, or through public channels, they are often bound by nondisclosure agreements and operate behind closed doors. Because of this, criticism that was once done in public by these actors, is now absorbed into the operations of these companies. As can be understood by the (rare)

public criticisms of this model made by included stakeholders, this form of networked governance can often lead to a communication environment that is both networked and vertical, with networked actors lacking visibility of these more hierarchical decision-making processes (Wilikilagi, 2009). In this sense, governance networks tend to complicate classic notions of accountability; that *who should be held accountable can be clearly identified and held responsible*, and that pathways for accountability should be direct, with consequences clearly defined (Helberger et al., 2017; Sørensen & Torfing, 2005). Network governance that is highly controlled may lead to less accountability overall.

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