



KommAustria
Kommunikationsbehörde Austria

YOUTH PROTECTION REPORT

2025



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Youth Protection Report 2025

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Requirements for the protection of minors and subsequent implementation

1. General information: legal framework for self-regulation

The self-regulatory system for the protection of minors from audiovisual content that may impair minors' development was introduced on the basis of Directive (EU) 2018/1808 of the European Parliament and of the Council of 14 November 2018 amending Directive 2010/13/EU on the coordination of certain provisions laid down by law, regulation or administrative action in Member States concerning the provision of audiovisual media services (Audiovisual Media Services Directive, AVMSD).

The Austrian legislative framework was amended (Federal Law Gazette I No. 150/2020) to incorporate these EU provisions. Obligations imposed on audiovisual media service providers include the requirement to draw up and follow guidelines for presenting viewers with sufficient information for assessing the potential harm posed to minors by content. Such guidelines must describe the nature of the content that could impair the physical, mental or moral development of minors, using language easily understood by users. Legislation has also been passed that aims at uniform national conduct guidelines, by requiring media service providers to support and contribute to initiatives to establish and improve the efficiency of self-regulation; cf. Art. 39 of the Audiovisual Media Services Act (AMD-G) and Art. 10a of the ORF Act (ORF-G).

At the same time, regulations governing the requirements for self-regulatory bodies have been set out, while funding for a youth protection self-regulatory body is to be provided by KommAustria (cf. Art. 32a and Art. 32b of the KommAustria Act (KOG)). KommAustria has prepared and published guidelines for awarding grants out of the Fund for the Promotion of Self-Regulation in Commercial Communication.

Thus, responsibility for implementation of an industry-wide youth protection system based on the aims of the amended AVMSD, as well as for verification of compliance with the system, has been delegated in part to a self-regulatory body.

Art. 32a KOG provides for the following prerequisites for recognising a self-regulatory body:

"Self-regulatory bodies

Art. 32a. (1) The activities of recognised self-regulatory bodies may be granted funding in order to help achieve the goal of ensuring compliance with minimum European standards on the part of content providers.

(2) A recognised self-regulatory body is defined as a body with legal personality that:

- 1. guarantees a broad representation of the providers concerned, and comprehensive transparency in respect of decision-making criteria, procedures and the enforcement of decisions;*
- 2. defines conduct guidelines and rules of procedure that are generally recognised by the primary stakeholders and which clearly define the goals of self-regulation;*
- 3. ensures the periodic and transparent monitoring and assessment of the fulfilment of these goals, exclusively by an external and independent entity;*
- 4. ensures that complaints are effectively handled and that its decisions are enforced, including the imposition of effective and proportionate sanctions in the event of breaches of the conduct guidelines;*
- 5. prepares a report concerning its activities, its established goals, and the measures and decisions taken in accordance with No. 3 and 4, and publishes this report in a suitable format.*

(3) Sanctions within the meaning of Par. 2 No. 4 include in particular:

1. the publication of a decision by the self-regulatory body;
2. the publication of a recommendation for future conduct by the self-regulatory body;
3. the revocation of a quality seal or positive designation granted in accordance with the body's guidelines;
4. potential identification of a breach or warnings in accordance with the body's legal framework.

(4) Every four years, the self-regulatory body shall provide the regulatory authority with a report on the body's structure and working practice that illustrates its contribution to the goal of achieving compliance with minimum standards on the part of content providers."

The effectiveness of this self-regulatory system is subject to a subsequent audit by KommAustria, following completion of various reporting duties (activity report pursuant to Art. 32a Par. 2 No. 5 KOG; effectiveness report pursuant to Art. 32b Par. 4 KOG; and report on structure and working practice, due every four years under Art. 32a Par. 4 KOG). In the activity report, KommAustria is to present its assessment of effectiveness as well as appropriate recommendations (Art. 19 KOG).

The framework governing both the organisation and the specific activities of the self-regulatory body for youth media protection in audiovisual media (TV and on-demand services) was set out when the body was established in 2021. This framework was implemented by the Association for the Protection of Minors through Self-Regulation of Audiovisual Media Products and Services, which has worked with the industry to develop uniform guidance on conduct and procedure, and also set up a complaints system.

In early 2026, the association published its activity report and effectiveness report for 2025, together with the report on its structure and working practice. Issued every four years, the latter report describes the association's efforts towards securing compliance with minimum standards.

2. Association for the Protection of Minors through Self-Regulation of Audiovisual Media Products and Services

Formed on 17 June 2021, the Association for the Protection of Minors through Self-Regulation of Audiovisual Media Products and Services (hereinafter: association) is entered in the Central Register of Associations under ZVR number 1686796152, and is based in Vienna.

In accordance with its articles of association, the association's primary objective is to ensure effective self-regulation so as to protect minors from content in audiovisual media services that could impair their physical, psychological or moral development and which falls within the remit of the Austrian regulatory authorities under applicable legal provisions.

In pursuit of this overarching goal, in accordance with provisions of law and its articles of association, the association acts as follows:

- Establishment of a legal entity that meets the requirements for a self-regulatory body as defined by Art. 32a KOG, first and foremost by ensuring a broad representation of media service providers who have committed to the protection of minors.
- Drafting and adoption of conduct guidelines and rules of procedure that are generally recognised by the primary stakeholders—and therefore the providers of audiovisual media services who have committed to the protection of minors—and which unambiguously define the goals of self-regulation.
- Ensuring the proper treatment of complaints and the enforcement of decisions, including the imposition of sanctions in the case of breaches of the conduct guidelines, by establishing an administrative office for handling complaints and by appointing an independent experts council to decide on such complaints.

- Guaranteeing full transparency in respect of decision-making criteria, procedures and the enforcement of decisions.
- Reporting fully on activities and the effectiveness of the measures taken, in accordance with legal requirements.
- Communicating with authorities, ministries and other state and non-state actors, as well as with international associations or organisations pursuing similar goals.

The Association for Telecommunications and Broadcasting Companies within the Austrian Federal Economic Chamber, the ORF and the Association of Austrian Commercial Broadcasters (VÖP) have been ordinary members since its formation.

Other members—both ordinary and extraordinary—may be admitted on the terms of the association's constitution. The association presents its articles on its website (www.jugendmedienschutz.at).

The articles of association assign leadership responsibilities to a management board. The board is tasked with managing the association's business and organisational operations as well as reporting duties, in particular the preparation of and the formal decision to adopt the conduct guidelines and rules of procedure as required by Art. 39 AMD-G. The board also handles the establishment of and appointments to the experts council as a complaints body, as well as the handling of objections to decisions that impose sanctions on media service providers as a result of breaches of the conduct guidelines.

The management board is made up of Helga Tieben (chair), Corinna Drumm (treasurer) and Daniela Nemecek (secretary).

Alice Krieger-Schromm was appointed head of the administrative office in 2021.

In line with the association's rules of procedure, the experts council (cf. Article 14(2) of the articles of association) makes decisions on such complaints as may be filed as a result of alleged breaches of the conduct guidelines on the part of media service providers. The following individuals have been appointed members of the experts council:

- Pia Bambuch, ProSiebenSat.1 PULS 4 GmbH, director of legal and regulatory affairs
- Frank Holderied, ServusTV, head of programming, purchasing and in-house fiction content productions
- Claudia Horvath-Polak, ORF, film and series youth protection/member of the Youth Media Commission
- Andreas Ney, Austrian Federal Economic Chamber/Association for Telecoms/Broadcasting, deputy managing director
- Lisa Zuckerstätter, ORF, access services—youth protection officer

3. Conduct guidelines

The conduct guidelines as of August 2021 can be viewed on the association's website (www.jugendmedienschutz.at/verhaltensrichtlinien/).

In accordance with the provisions of EU law and Austrian legislation, the conduct guidelines aims to establish an effective and uniform nationwide system for the protection of minors from content in audiovisual services (broadcasting and on-demand services) that has the potential to impair their development. This system should be easily understood by viewers—especially by minors and their legal guardians—and should be recognised and implemented by as many providers as possible.

The guidelines specify (minimum) requirements for the protection of minors in the context of audiovisual services. In cases where providers wish to offer a higher level of protection on a voluntary basis, the guidelines make recommendations for ensuring such initiatives are as uniform as possible.

Content potentially impairing the development of minors must be offered by providers in such a way as to prevent it from being generally viewable or consumable by minors. As part of meeting this requirement, television broadcasters must choose appropriate broadcasting times. Providers of on-demand services must use suitable measures to achieve a level of protection comparable to that offered by broadcasting time slots, either by also restricting the daily accessibility of content potentially impairing development, or through other appropriate measures.

Certain content potentially impairing development is not prohibited by law but is to be classified as particularly harmful, such as the casual depiction of sexual acts (hardcore pornography and other pornographic material that does not meet the criteria for being considered content prohibited by law). Such content may be provided only if measures such as age verification systems or comparable access control measures are in place to ensure that minors are not generally able to use it. News broadcasts and party political broadcasts are exempted from these obligations.

If broadcasts that should typically not be viewed by minors are made freely accessible by television broadcasters during broadcasting times that are less suitable for scheduling such broadcasts from a youth protection perspective, such broadcasts must be identified accordingly (announcement by means of an acoustic signal or the application of a visual identifier throughout the entire broadcast; the ORF must comply with stricter standards that require identification with acoustic signals and visual identifiers throughout the entire broadcast).

In addition to the identification requirement, all media service providers are also required to present viewers with sufficient information for assessing the potential harm posed to minors by the content. Media service providers must describe the nature of the potentially harmful content using references that are easily understood by viewers. Details of these new duties to present information ('information system') are given in the conduct guidelines.

To ensure that programme content potentially impairing development cannot generally be viewed by the minors who are to be protected, television broadcasters undertake to comply with the following broadcasting time slots (depending on the age classification of the programme in question):

- Daytime television, 6 am to 8 pm: Content in programmes broadcast during the day must be suitable for (young and older) children. Accordingly, all programmes broadcast must have content suitable for children in the 12 and under range or, in isolated cases (and if this does not impair the well-being of younger minors), 12 and over (but not 16 and over). All daytime programmes with an age classification of 12 and over must comply with labelling requirements.
- Evening television, 8 to 10 pm: During the evening television slot, programmes are broadcast that fall under the 12 and over category or a lower category or, in isolated cases (and if this does not impair the well-being of younger minors), the 16 and over (but not 18 and over) category. All programmes with an age classification of 16 and over must comply with labelling requirements.
- Late evening television, 10 to 11 pm: During the late evening television slot, programmes are broadcast that fall under the 16 and over category (with labelling) or a lower category.
- Night-time television, 11 pm to 6 am: Programmes falling under any age category can be broadcast during the night-time slot. All programmes falling under the 16 and over or 18 and over age category must comply with labelling requirements.

The self-regulatory body has stated that the guidelines are modelled (and expand) on accepted practice in youth protection in the industry to date, especially as regards questions of selecting broadcasting times or time slots in which content potentially causing harm should be shown or made available, and established practice regarding acoustic and/or visual labelling.

The conduct guidelines also recommend the voluntary provision of additional information (supplementing the recommended age classification and notes on the potential harm) on the part of television broadcasters, which is to be included in information sources accompanying their programming such as EPGs, teletext or specialised online services. However, broadcasters are not required to present such information.

3.1 Rules for television programming

As mentioned above, the information system for television broadcasters pursues the goal of presenting viewers—and parents and minors in particular—with sufficient information, in a simple and easily comprehensible format, that allows them to assess the potential harm posed to minors by content.

Specifically, the submitted conduct guidelines require television broadcasters who broadcast freely accessible programmes outside the recommended broadcasting time slots—thus potentially impairing the development of minors—to offer at the start of the programme simple and easily understood references to the recommended age classification (age reference) and the nature of the potential harm posed by the programme that follows (harm reference or label).

The age references use the international age limits (which have also been applied in Austria for many years) and are oriented towards the classifications from the FSK (voluntary film industry self-regulatory body) and the FSF (voluntary television industry self-regulatory body). Five separate age categories are defined:

- Content is not suitable for minors: 18 and over
- Content is suitable for minors of at least age 16: 16 and over
- Content is suitable for minors of at least age 12: 12 and over
- Content is suitable for children/minors of at least age 6: 6 and over
- Content is suitable for children/minors of any age: 0 (no restrictions)

A classification system provides objective definitions of the type of content considered unsuitable for the individual age categories, since this content has the potential to impair the development of children and minors.

According to the conduct guidelines, content potentially impairing development is further subdivided into the four harm categories of 'violence', 'anxiety', 'inappropriate behaviour' and 'sex'. Harm guidance must further be presented so that, at the start of the programme and as an adjunct to the age warning, at least one of these harm categories is specifically indicated using a visual overlay with a text identifier ('violence', 'anxiety', 'inappropriate behaviour' and/or 'sex').

Before the start of each programme subject to a labelling requirement, the age and harm reference are shown in easily legible lettering of an appropriate size along the top edge of the screen for at least three seconds.

In line with the conduct guidelines, broadcasters are free to supplement the harm reference with more detailed descriptions of the potential harm, but must ensure that these details do not compromise the easy comprehensibility of the reference. It is recommended that broadcasters include easily accessible age/harm references in the information sources that accompany their programming (such as the EPG, teletext or website).

To ensure that the youth media protection system in Austria is as uniform as possible, a set of assessment standards is required. Accordingly, the conduct guidelines define uniform standards and assessment criteria for each age category. These assessment standards and criteria have been developed while taking the greatest possible account of established assessment criteria recommended by recognised youth protection bodies.

3.2 Rules for on-demand services

As is the case for television broadcasters, providers of on-demand services must also ensure that programmes potentially impairing the physical, psychological or moral development of minors are provided in a way that prevents them being generally viewable or consumable by minors.

Like television broadcasters, providers of on-demand services must also set up an appropriate information system that allows their users to make informed decisions about the content to be viewed. In line with the conduct guidelines, the age classification system and assessment standards apply *mutatis mutandis* to on-demand services.

The conduct guidelines states that on-demand services may provide the required level of protection for minors by deploying an effective control system secured by access codes. If a control system based on time of access (effectively modelled on the broadcasting time slots used in television) is used, then service providers must use age references and programme-specific harm labelling to designate programmes subject to labelling requirements (based on age category and access time). Additional information provided in support of programming is also recommended but is not mandatory.

4. Youth protection at the ORF

Pursuant to Art. 10a ORF-G, the ORF summarised the youth protection activities in ORF media services as part of its 2025 annual report.

In this report, the ORF as a public media company underlined the fact that youth protection has from the outset been a priority concern. In the ORF's television, radio and online services, youth protection can be ensured by means of high-quality programme work, responsibly minded programming and active self-regulation on the part of programme producers.

The ORF does not view its youth protection duties as limited to merely labelling broadcasts to comply with European regulations. The broadcaster has correspondingly adopted a wide range of voluntary guidelines and codes aimed at protecting minors.

4.1 Youth protection in ORF television

In its approach to the handling of broadcasts that are less suitable for viewing by children and adolescents, the ORF builds on existing, voluntary guidelines, while complying with additional measures derived from applicable law.

Throughout its programming, the ORF utilises opportunities to protect minors, with the aim of avoiding any impairment to their physical, mental or moral development. Such opportunities arise during programme acquisition, production and editing, in the exercising of due care in the design and placement of programme trailers, in scheduling that properly accounts for time slots, and in terms of the labelling and information provided to viewers.

Each broadcast is checked by the responsible editorial team at the production and/or acquisition stage. When determining the suitability of a specific programme for a specific age category, the ORF may base such decisions on the recommendations of the Austrian Youth Media Commission (JMK) at the Federal Ministry of Education, Science and Research, and on age classifications used by the German FSK (voluntary film industry self-regulatory body) and German FSF (voluntary television industry self-regulatory body). Cooperation with the JMK is a key aspect of the support provided to editorial decision-making. Since 2002, the ORF has used the option of submitting programmes to a review committee to obtain a recommended classification.

In accordance with legal provisions and the conduct guidelines from the above-mentioned association, the ORF has adopted the following youth protection measures.

Scheduling by broadcasting time slots

For many years ORF has been ensuring that programme content potentially impairing development is scheduled to comply with strict time slots that are coordinated to the developmental stages of minors.

All programmes broadcast before 8 p.m. normally must have content suitable for children in the 12 and under range or, in isolated cases (and if this does not impair the well-being of younger minors), 12 and over (but not 16 and over).

After 8 p.m., the ORF considers parents and legal guardians to share responsibility for the viewing habits of their young and adolescent children. During the evening television slot (8 to 10 pm), programmes with a higher age classification (12+ and 16+) may be broadcast but not programmes falling under the 18 and above category.

Programmes falling under the 18+ age category may be broadcast only during the night-time slot (11 pm to 6 am).

Labelling of television programmes with fiction content

As a complement to responsible programming, the ORF has provided programme labelling for the protection of children and adolescents since 1 January 1999.

In linear television, programmes falling under the 16+ or 18+ age category are always labelled as such regardless of their broadcast time. Programmes falling under the age category of 12+ are labelled as such only during daytime television (6 am to 8 pm).

At the start of labelled programmes broadcast after 10 pm—this applies in most cases to feature films and series—the age reference is supplemented by an acoustic signal and a reference to the nature of the harm involved. This guidance and/or descriptors may signify 'violence', 'horror', 'inappropriate behaviour' or 'sex'. The information is shown for three seconds at the top edge of the screen.

4.2 Youth protection in ORF online services and ORF TELETEXT

As with all other channels operated by the ORF, the design and execution of all programming on ORF.at is subject to legally mandated and voluntarily adopted guidelines and codes. The ORF's online services are reviewed on a rolling basis to exclude any content harmful to minors.

Any pages these services link to are also subject to a thorough review. These review processes prioritise the content on ORF.at that is aimed at children and adolescents. Forums are also subject to youth protection guidelines and codes, with compliance being the responsibility of the forum administration team.

Programmes falling under the 12+, 16+ or 18+ age category are labelled accordingly in ORF ON and tv.ORF, as well as in ORF TELETEXT (regardless of their actual TV broadcasting time slot). ORF ON and tv.ORF.at also use a descriptor ('violence', 'horror', 'inappropriate behaviour' or 'sex') to indicate the nature of the harmful content.

The ORF has also adopted the measures as listed below on ORF ON. By agreement with the competent main ORF departments, certain series or productions are made available as video-on-demand items on ORF ON only between 8 pm and 6 am or 10 pm and 6 am. These restrictions do not apply to users with an age-verified personal account, however, as they can log in and access these broadcasts at any time.

Users of ORF ON are informed appropriately about these restricted viewing times when they click to select the corresponding programme. In addition to these arrangements, no advertising is permitted during children's programming.

The editorial content offered by the ORF TELETEXT service is likewise prepared in strict accordance with the ORF Act and the relevant provisions from this law that address youth protection. Materials provided by business partners and advertising customers must also comply in full with legal requirements and be monitored to confirm the absence of harmful content.

5. Rules of procedure

The conduct guidelines, formally designated the association's 'rules of procedure,' defines the process for handling complaints and the adoption of decisions on complaints by the experts council. The conduct guidelines also address the possibility of objecting to the council's decisions, the enforcement of such decisions and the imposition of appropriate sanctions on media service providers. The rules of procedure can be accessed from the association's website (see www.jugendmedienschutz.at).

The self-regulatory body publishes an annual activity report that informs the general public about a number of topics, including the measures and decisions adopted by the body in the reporting year, as well as the sanctions imposed as a result of breaches of the conduct guidelines. See [section 7.2](#) for a report on complaints received by the association in 2025.

6. Recognition of the conduct guidelines and rules of procedure

The provisions of Austrian youth protection legislation require the widest possible acceptance of the conduct guidelines and rules of procedure (cf. Art. 32a KOG). To achieve this level of acceptance, industry representatives were closely involved in the drafting process for these rules.

Beyond the practical involvement of industry representatives, formal recognition (in the form of a documented proof of recognition) of the conduct guidelines and rules of procedure was also required. With reference to their individual obligation as broadcasters or on-demand service providers to create and comply with specific conduct guidelines (cf. Art. 39 Par. 4 AMD-G), media service providers were advised to fulfil their legal duties by publishing a youth protection declaration on their website, in which they formally recognise and agree to be bound by the conduct guidelines and the rules of procedure set out by the self-regulatory body.

According to the association's reports for 2025, a large part of the work focused on extending acceptance of the conduct and procedural guidelines among the industry and supporting implementation of these in practice.

In 2025, efforts to obtain more youth protection declarations from industry representatives continued, with the aim of improving the industry's acceptance of the association. Following written and telephone contacts, acceptance has considerably increased, so that as of 31 December 2025 107 television broadcasters and 104 on-demand service providers had notified the association of their acceptance of the conduct guidelines and rules of procedure (compared with 94 broadcasters and 91 on-demand service providers at the end of 2024).

The individual providers are listed in the activity report published by the association (in German; available at www.jugendmedienschutz.at/organisation).

In 2025, the administrative office also started work on revising the list of those Austrian audiovisual media services whose signed youth protection declarations have already been accepted and recognised by the association. This process, which will continue into the 2026 reporting year, has focused on confirming the existence of the respective media service as well as the currency, completeness and public availability of the youth protection declaration.

7. 2025 reports

7.1 Effectiveness report

Pursuant to Art. 32b Par. 4 KOG, the self-regulatory body for the protection of minors is to submit an annual report addressing the effectiveness of conduct guidelines provisions, as well as the type, number and outcome of complaints, to KommAustria by 31 March of the following year.

According to the report, the following effectiveness criteria are specified pursuant to Art. 32a Par. 2 KOG:

- Conduct guidelines have been drafted that unequivocally define the objectives of self-regulation in youth protection for media services.
- The conduct guidelines have been recognised by the primary stakeholders.
- The conduct guidelines have been implemented and observed.

The association's formation, the drafting of the conduct guidelines, their provisions and progress towards their recognition by the primary stakeholders are presented above.

The following measures for auditing conduct guideline implementation and compliance were set out in 2025:

In 2025, the association conducted an effectiveness audit of participating media services that examined two key criteria. First, whether these media services had submitted a full, signed youth protection declaration to the administrative office; and second, whether this declaration and/or the recognised conduct guidelines had been published on the service's website, including a link to the youth protection guidelines.

Auditing was carried out consistently throughout 2025. The media services were informed of any compliance weaknesses and instructed correspondingly. At the end of 2025, a final analysis revealed a 'pass rate' of almost 100%: of 107 television broadcasters and 104 on-demand service providers, almost all participants completed the effectiveness audit successfully. All of the others have submitted a youth protection declaration but had not, for example, signed it or published it online.

In the course of 2025, the administrative office reviewed the content of participating media service providers for compliance with youth protection standards. This review, which was conducted by examining a random sample of films and programmes, aimed to establish whether labelling (announcement by means of an acoustic signal or the application of a visual identifier throughout the entire broadcast) and information (age rating and harm guidance) had been provided as required.

The review focused on a large number of smaller media service providers. In cases where the review process identified irregularities—an absence of proper labelling or inadequate guidance, for example—the media services concerned were promptly informed of the issues in question. This approach helped to foster constructive cooperation between the association and the media services.

Looking at the results of the effectiveness audit on the one hand and the youth protection compliance audits of media services on the other, the association found that the major providers and many smaller providers alike had acted to ensure adequate implementation of the conduct guidelines and the information system in particular, including age and harm references, by the end of 2025. No major instances of non-conformity were identified. In the event of minor non-conformities, the media service was contacted and informed promptly, and the issues then resolved.

In all other respects, the association as self-regulatory body found no other evidence to suggest that media service providers who had formally recognised the conduct guidelines had not (or not adequately) implemented them in practice.

In its effectiveness report published at the end of 2025, the association accordingly concludes that the television broadcasters and on-demand service providers who have recognised the new rules also implement these rules in practice.

The association plans to continue the effectiveness audit and the youth protection conformity audits of media services in the 2026 calendar year, so as to monitor and provide evidence of the implementation of the conduct guidelines..

7.2 Complaints scorecard

The self-regulatory body publishes an annual report that provides information about a number of topics, including the measures and decisions adopted by the body in the reporting year, the sanctions imposed as a result of breaches of the conduct guidelines, and the number, type and outcome of the complaints received.

Four formal complaints were submitted to the self-regulatory body in the 2025 calendar year in response to a breach of the conduct guidelines (2023: six; 2024: four). Three complaints were processed in this calendar year. The fourth complaint was received by the association's administrative office at the end of 2025: a decision on this case will therefore be issued in 2026.

One complaint alleged that an episode of a TV series broadcast on a Sunday afternoon contained explicit pornographic material.

In this case, the media service applied corresponding labelling (age rating '16+', descriptor 'sex') even before the experts council issued a decision. The programme is no longer broadcast during the daytime television slot. The episode is only available via the on-demand service in the evening or with an age-verified account.

After reviewing the programme in question, the association deemed the episode only suitable for viewers aged 16 and over in its current form. To maintain compliance with the conduct guidelines, the episode should therefore have been broadcast in the late evening slot (from 10 pm) or in the main evening slot (from 8 pm) with a corresponding age rating and a descriptor ('sex'). Given the nature and degree of the breach, and the fact that the media service took immediate action to label the episode in line with the conduct guidelines, the association applied the principle of proportionality pursuant to Art. 10 Par. 2 of its rules of procedure and decided not to levy a penalty.

Another complaint concerned a television programme rated '12+' that, in the complainant's view, explicitly made reference to three issues considered unsuitable for twelve-year-olds: sex (including vulgar references to and portrayals of the same), alcohol and smoking.

The media service provider had made the programme in question available on a streaming platform without any time-of-day access restrictions. All of the episodes in the season had been consistently labelled with a '12+' age rating. In the case of episodes 11 to 13, however, and in the interests of protecting minors, the experts council was of the opinion that it would have been more appropriate to apply time-of-day access restrictions or to broadcast an edited version of this material. In the view of the council, these episodes include clear portrayals of sexual activities and vulgar language that should not have been categorised as suitable for viewing by children or adolescents aged twelve or younger. On the other hand, the experts council did not consider the portrayals of alcohol consumption and smoking in these episodes to be inappropriate viewing for the age group in question.

The association therefore adjudged the media service to be in partial breach of the conduct guidelines: no time-of-day access restrictions had been applied to the episodes in question, nor had these episodes been edited to ensure their suitability for children or adolescents.

One complaint was dismissed due to incomplete information.

A summary of the decisions made to date by the expert council can be accessed on the association's website (in German) at: www.jugendmedienschutz.at/entscheidungen

It has been possible to ensure a smooth workflow to process complaints and thus a sound procedure thanks to regular evaluations and reviews of the complaints system.

7.3 Activity report

Apart from a summary of complaints received, the activity report also covers other work completed by the association. One focus of the association's activities in 2025 was more extensive public relations work and engagement with stakeholders. These activities aimed to further raise awareness of the association and ensure that its monitoring function is recognised—and used—by the interested public.

This meant more intensive networking with relevant stakeholders, with both sides getting to know each other, exchanging views on important youth media protection issues, identifying common ground and providing insights into each other's work. (Stakeholders included the Austrian Digital Services Coordinator/ KommAustria, Youth Information Austria and Burgenland, youth affairs departments in the provincial governments, Mimikama, political parties, federal ministries, Google and the Austrian Chamber of Labour.)

The association also conducted networking activities with the new Swiss Youth Media Protection Association (FJSR) in 2025. Although the FJSR is a very new organisation, it intends to orient its work activities towards the conduct guidelines issued by the association.

The association's media relations work focused primarily on issuing press releases, and placing articles in trade and consumer media. The association also took part in several panels and round-table discussions. An introductory piece about the association was published on the www.gewaltinfo.at website in May.

7.4 Summary for 2025 and outlook for 2026

Looking at the reports submitted for 2025, the association offers the following conclusions about the past and upcoming calendar years.

Throughout 2025, there was a strong focus on obtaining new youth protection declarations and participating media services. This necessitated close cooperation with the Austrian audiovisual media industry that, in turn, yielded a further increase in the number of declarations received as well as progress in many other areas.

To achieve greater visibility and make itself more accessible to the general public, the association engaged in extensive and wide-ranging networking activities with public and private stakeholders.

The association also reviewed the practical application of the conduct guidelines by providers in 2025, as well as their level of compliance. According to the association, the spot checks it carried out in the reporting year show that most of the media services already comply with the media protection regulations for minors while also adhering to the recognised guidelines.

The complaints received confirm the active use of the complaint mechanism. Four complaints were received in the 2025 calendar year (2023: six; 2024: four) and the complaints management procedure worked as expected. The association takes the relatively low number of complaints about breaches of youth protection guidelines as evidence of the high level of compliance among media service providers that have voluntarily adopted its guidelines. As the association notes, this is the basic principle of self-regulation, i.e. prevention rather than sanctions.

In 2026, one focus of the association's activities will be to present the work of the association to the general public, to improve the visibility of the association and to organise meetings with stakeholders. Other activities are also planned in relation to the association's fifth anniversary, which it celebrates in 2026. Another focus in 2026 will be the work of the experts council, which continues to receive investment in recognition of its specialist expertise and its central role within the association.

Other priority areas for the association in 2026 will include the processing of incoming complaints, improving the acceptance and awareness of the conduct guidelines and rules of procedure in the industry, monitoring the implementation of these conduct guidelines by businesses in practice, and increasing the numbers of youth protection declarations received. Complaints management will continue to be evaluated as an ongoing process.

7.5 Report on the association's structure and working practice

Pursuant to Art. 32a Par. 4 KOG, the self-regulatory body is to provide the regulatory authority with a report every four years, covering the body's structure and working practice and demonstrating its contribution to the goal of achieving compliance with minimum standards on the part of content providers.

Among other matters, the report presents the well-established organisational structure, with the management board as the executive body, the administrative office as the operative arm, the experts council as an independent decision-making body for complaints procedures, and rules of procedure for the complaints and decision-making process.

After formation, the association was quick to set up a solid structural basis for its work. Examples include the development of the conduct guidelines, internal codes and procedural standards, as well as the deployment of a well-functioning complaints system. Since 2022, the association has stepped up its efforts to establish acceptance in the industry, to intensify dialogue with media services and to obtain formal declarations of voluntary compliance. In recent years, good progress has been made both with the effectiveness audits and in recognising the association as a self-regulation body.

The association conducts rolling monitoring of audiovisual services by reviewing random samples of their content to confirm compliance with minimum standards. These reviews aim to ensure that labelling requirements are being met, and that age ratings and content descriptors are being provided in accordance with the conduct guidelines. The association also points to the low number of complaints procedures as evidence of the system's overall effectiveness in prevention.

8. Evaluation, assessment and recommendations by KommAustria to improve effectiveness

Based on the reports submitted, the regulatory authority must present in its activity report the level of compliance with the requirement to provide information in the form of content warnings to viewers. The regulatory authority must publish an activity report presenting its assessment of and recommendations on effectiveness.

First, on the basis of the reports submitted during 2025, it needs to be seen that both the association's internal processes and the complaints management system are in general well established. The number of complaints, actually moderate, made it possible to further review and evaluate the functioning of the complaints system. One positive development in this context is the fact that two of the complaints received in 2025 led to content reviews and subsequent decisions.

Beyond that, the association endeavoured to increase recognition of the self-regulation system among broadcasters and media service providers, with this process again proving effective in 2025. The number of television broadcasters and on-demand service providers who recognise the self-regulation system increased by more than 10% year on year, a result that underlines the consistently increasing acceptance of the association in Austria, including among smaller providers.

Another focus was on raising the association's public profile through increased public relations and media work.

KommAustria welcomes the continued progress in the way of organisation and areas of activity, as presented in the reports, which the association has made since its founding. The continuous process of professionalisation, the handling of complaints and the routine effectiveness audits give KommAustria no grounds for calling into question the basic effectiveness of the self-regulation system as established by the association. The report on structure and working practice further substantiates this assessment.

In consideration of the above, KommAustria welcomes the priorities as announced by the association for its future work, while adding the comments listed below.

In 2025, the association successfully pursued its primary objective of convincing providers of the merits of the self-regulation mechanism and the uniform nationwide conduct guidelines. The association should continue its efforts to obtain more youth protection declarations, not least because, in the event of failing to publish such a declaration, an Austrian media service is required by law to draw up and monitor specific conduct guidelines directly (cf. Art. 39 Par. 4 AMD-G).

Key priorities here include enhancing the self-regulatory body's public visibility and raising awareness of its supervisory role among interested members of the public. Such work must also address public knowledge and use of the complaint mechanism. KommAustria views the low volume of complaints received as clear evidence of the system's overall effectiveness.

To ensure the self-regulation system can achieve its full potential, a continued focus on the association's tasks and objectives (as envisaged by its statutes) would appear appropriate. This includes further strengthening the industry's acceptance, knowledge and application of the conduct guidelines.

Another crucial aspect here is to audit media service providers to ensure compliance with their self-imposed guidelines. Conducted as a rolling audit by the self-regulatory body, this process should include monitoring proper application of age limits/categories, broadcasting time restrictions as well as information and descriptors. Efforts should be stepped up here, however, considering the continued public attention paid to aspects of youth protection inherent to certain broadcasting formats. In this context, mention is also made of a key decision (although not legally enforceable) issued by KommAustria in the reporting period concerning an episode of a reality TV series offered as on-demand content by an Austrian media service provider. The decision finds that this episode violates human dignity, incites gender-based violence against women and breaches the youth protection provisions of the AMD-G by making this episode available on demand.

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