

Case Note

PROCEDURAL GAPS
IN UAE SOCIAL MEDIA REGULATION:
ACCESS TO JUSTICE
AND REFORM PERSPECTIVES

Habiba Al Shamisi

ABSTRACT

Background: The rapid expansion of social media platforms has significantly altered public discourse and media governance, posing complex legal challenges regarding content regulation and access to justice. In the United Arab Emirates (UAE), Federal Decree-Law No 55 of 2023 represents a major legislative development aimed at modernising media regulation in the digital era. However, questions remain regarding the adequacy of procedural safeguards available to individuals affected by unlawful or harmful online content. This study evaluates the effectiveness of the UAE regulatory framework in ensuring meaningful access to justice in social media content disputes and identifies areas requiring legislative reform.

Method: The analysis adopts a doctrinal approach, focusing on the UAE legal framework, with limited comparative reference to European regulatory standards, including the Digital Services Act and relevant European Court of Human Rights (ECtHR) jurisprudence.

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Results and Conclusions: *The study identifies gaps in transparency, appeal mechanisms, judicial review, and procedural clarity that may limit effective user protection. Targeted reforms, particularly strengthening procedural guarantees and independent review mechanisms, are necessary to enhance legal certainty and balance freedom of expression with the protection of individual rights in the UAE's digital environment.*

1 INTRODUCTION

This contribution adopts a doctrinal legal methodology centred on the systematic interpretation of statutory texts, regulatory instruments, and judicial practice relevant to social media content governance in the United Arab Emirates. The primary analytical focus lies on Federal Decree-Law No. 55 of 2023¹ and its interaction with Federal Decree-Law No. 34 of 2021², as well as associated executive regulations and institutional mandates governing media oversight.

This study is designed as a doctrinal and reform-oriented analysis. It aims to identify regulatory gaps and propose targeted legal improvements, rather than to provide a comprehensive empirical or comparative analysis. In applying this methodology, the analysis examines the structure, scope, and procedural implications of the relevant legal provisions, with particular attention to how regulatory standards are formulated, enforced, and challenged in practice. This approach enables the identification of procedural gaps not only through the absence of explicit legal provisions but also through the limited accessibility and clarity of existing mechanisms.

To contextualise the reform analysis, the study incorporates a limited comparative dimension by referencing selected European regulatory instruments, most notably the Digital Services Act,³ and relevant ECtHR jurisprudence concerning freedom of expression and procedural guarantees.⁴

The comparative element is employed as a normative benchmark rather than a full structural comparison, enabling the evaluation of procedural safeguards such as notice-and-action mechanisms, transparency obligations, appeal procedures, and judicial review standards. The selection of sources is based on their direct relevance to the regulatory

1 UAE Federal Decree-Law No (55) of 2023 Regulating Media (adopted 2 October 2023) [2023] Official Gazette 762.

2 UAE Federal Decree-Law No (34) of 2021 on Countering Rumors and Cybercrimes (adopted 20 September 2021) [2021] Official Gazette 712.

3 Regulation (EU) 2022/2065 of the European Parliament and of the Council of 19 October 2022 on a Single Market for Digital Services (Digital Services Act) [2022] OJ L 277/1.

4 Judit Bayer, 'Procedural Rights as Safeguard for Human Rights in Platform Regulation' (2022) 14(4) Policy & Internet 755, doi:10.1002/poi3.298.; Lorna Woods, 'Digital Freedom of Expression in the EU' in Sionaidh Douglas-Scott and Nicholas Hatzis (eds), *Research Handbook on EU Law and Human Rights* (Edward Elgar Publishing 2017) 394, doi:10.4337/9781782546405.00029.

framework governing social media content in the UAE. The analysis prioritises primary legislative instruments, including federal decree-laws and related regulatory provisions, as well as relevant judicial practice where available.⁵

For the purposes of this study, access to justice is understood as the ability of individuals to effectively challenge regulatory decisions and seek remedies through transparent, accessible, and procedurally fair legal mechanisms.

The analytical framework is structured around four evaluative criteria:

- (1) clarity of regulatory standards governing digital content;
- (2) institutional allocation of supervisory powers;
- (3) availability and accessibility of procedural remedies; and
- (4) proportionality and judicial oversight mechanisms.

These criteria are applied throughout the analysis to assess whether the current UAE framework adequately balances freedom of expression with the protection of individual rights while ensuring meaningful access to justice in the digital environment.

2 THE LEGAL NATURE AND REGULATORY CONTEXT OF SOCIAL MEDIA PLATFORMS

The regulation of social media content requires a clear understanding of platforms as legal actors. Social media platforms are generally understood as digital systems enabling user-generated content and interaction within networked environments.⁶ Unlike traditional media, these platforms decentralise editorial control and allow users to function simultaneously as content creators and distributors.⁷

From a legal perspective, their defining feature lies in their hybrid role as intermediaries that facilitate content dissemination while exercising varying degrees of content moderation

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- 5 Habiba Al Shamsi, 'Enhancing Digital Transactions with Blockchain Technology: Descriptive-Analytical Study' (2024) 7(3) Access to Justice in Eastern Europe 485, doi:10.33327/AJEE-18-7.3-a000322.
 - 6 Caleb T Carr and Rebecca A Hayes, 'Social Media: Defining, Developing, and Divining' (2015.) 23 (1) Atlantic Journal of Communication 46, doi:10.1080/15456870.2015.972282; Andreas M Kaplan and Michael Haenlein, 'Users of the World, Unite! The Challenges and Opportunities of Social Media' (2010) 53(1) Business Horizons 59, doi:10.1016/j.bushor.2009.09.003.
 - 7 Mohamed El-Erian and others, 'The Role of Artificial Intelligence in Enhancing Corporate Governance and Achieving Sustainable Development' (2026) 9(1) Access to Justice in Eastern Europe 208, doi:10.33327/AJEE-18-9.1-a000177.

and algorithmic control. This structure complicates traditional distinctions among publisher, host, and distributor, particularly regarding liability and procedural safeguards.⁸

While social media platforms vary in format, their legal significance lies in their regulatory impact rather than technical classification.⁹ Different platform models pose distinct legal challenges, including copyright, misinformation, privacy, and algorithmic amplification. UAE regulatory instruments reflect this diversity but do not adopt the granular classification model in the Digital Services Act, which differentiates obligations by platform size and systemic risk.¹⁰

European legislation has progressively clarified this role. The Digital Services Act (Regulation (EU) 2022/2065) establishes a harmonised framework for intermediary services and introduces procedural obligations, including notice-and-action mechanisms and internal complaint systems.¹¹

In the UAE, social media platforms are regulated indirectly through broader legislative instruments. Federal Decree-Law No. 34 of 2021 criminalises unlawful online content,¹² while Federal Decree-Law No. 55 of 2023 extends regulatory oversight to digital media activities.¹³ However, these instruments focus primarily on content control rather than intermediary liability structures.

This limitation becomes particularly relevant in the context of access to justice, as the absence of differentiated procedural obligations such as complaint mechanisms, transparency requirements, and appeal processes may restrict users' ability to effectively challenge platform decisions or seek remedies.

Social media platforms play a central role in contemporary public discourse and digital governance. Their capacity to shape information flows and influence public opinion has intensified legal concerns regarding content moderation and the protection of user rights.

This regulatory significance highlights the need for legal frameworks that integrate procedural safeguards and accessible remedies. In this context, access to justice emerges as a key dimension of digital governance, requiring mechanisms that enable individuals to effectively challenge decisions and seek legal redress.

8 Enas Mohammed Alqodsi, 'Extended Producer Responsibility in E-Waste Recycling: A Secure Path to a Sustainable Future for UAE' (2025) 33(1) Sustainable Development 309, doi:10.1002/sd.3107.

9 Kaplan and Haenlein (n 6).

10 Maya Khater, 'Electronic Intellectual Terrorism and the Islamic Efforts to Combat It' (2024) 68(1) Islamic Quarterly 59.

11 Regulation (EU) 2022/2065 (n 3).

12 UAE Federal Decree-Law No (45) of 2021 Concerning the Protection of Personal Data (adopted 20 September 2021) [2021] Official Gazette 712.

13 UAE Federal Decree-Law No (55) of 2023.

For the purposes of this study, social media platforms are understood as digital intermediaries that facilitate user-generated content while exercising moderation functions, making them central to disputes concerning unlawful online expression and access to justice.

3 SUBSTANTIVE CONTENT STANDARDS IN THE UAE LEGAL FRAMEWORK

The rapid expansion of social media platforms has significantly altered the way individuals communicate, exchange information, and participate in public discourse. While these platforms facilitate freedom of expression and access to information, they also pose legal risks to privacy, reputation, consumer protection, public order, and social stability.¹⁴ In response, the United Arab Emirates has adopted a regulatory approach that focuses primarily on the substantive legality of online content rather than on intermediary liability structures. This approach is reflected in the UAE Cybercrime Law and related legislation, which prohibit a broad range of online activities including defamation, privacy violations, dissemination of false information, and content deemed harmful to public order, social values, or individual rights.

The UAE legal framework adopts a content-centred regulatory model. Under this model, liability is primarily attached to the person who creates, publishes, or disseminates unlawful content. Consequently, courts have played an important role in clarifying the boundaries of lawful digital expression and in determining the extent to which online communications may give rise to criminal and civil consequences.¹⁵ Judicial practice demonstrates a consistent willingness to enforce substantive content standards even when the disputed content is published on personal social media accounts rather than in traditional media outlets.

A prominent example is the Dubai Court of Cassation Case No. 55/2023,¹⁶ which concerned a social media user who published a critical review of a hospital on Instagram. The defendant argued that the publication was motivated by dissatisfaction with medical services and was made in good faith. Nevertheless, the Court rejected these arguments and held that the public dissemination of statements that damaged the hospital's reputation constituted defamation under the applicable cybercrime legislation. The Court further clarified that neither emotional motivation nor the author's subjective belief in the accuracy of the statements was sufficient to exclude liability. This ruling is particularly

14 Basem Mohamed Fadel Madbouly, 'Tort Liability for Promoters of Rumors Via Social Media Platforms' (2022) 8(1) *Journal of Legal and Economic Studies* 343, doi:10.21608/JDL.2022.222366 [in Arabic].

15 Robin Kabha and others, 'Comparison Study between the UAE, the UK, and India in Dealing with WhatsApp Fake News' (2019) 10 *Journal of Content, Community and Communication* 176, doi:10.31620/JCCC.12.19/18.

16 Case no 55/2023 (Dubai Court of Cassation, 26 October 2023).

significant because it confirms that social media users are subject to the same standards of responsibility that traditionally applied to conventional forms of publication. The decision further illustrates the judiciary's preference for protecting reputation and institutional integrity where these interests conflict with expansive interpretations of online freedom of expression.

The importance of the judgment extends beyond the specific facts of the case. It reflects a broader judicial tendency to treat online publications as capable of producing serious social and legal consequences due to their speed of dissemination, permanence, and ability to reach large audiences. Consequently, courts have shown little tolerance for content that may undermine reputation or public confidence, even when the publication originates from a personal account and is framed as a consumer opinion or personal experience.

A similar approach can be observed in a recent judgment of the Dubai Court of Appeal,¹⁷ in which an individual was ordered to pay AED 250,000 in civil compensation after publishing a former employer's photograph along with false allegations of fraud on Instagram. The claimant had already secured a criminal conviction against the defendant under the Cybercrime Law for privacy violations and public insult. Building upon that criminal judgment, the civil court concluded that the online publication had caused substantial reputational and personal harm warranting financial compensation. The award demonstrates that unlawful online content may have consequences that extend beyond criminal sanctions and may expose individuals to significant civil liability.¹⁸

This case is particularly important because it illustrates the interaction between criminal and civil enforcement mechanisms within the UAE legal framework. The criminal conviction established the unlawfulness of the conduct, while the subsequent civil proceedings focused on compensating the injured party for the resulting damage. Such an approach strengthens the law's deterrent effect by ensuring that individuals who misuse social media platforms may face both punitive and compensatory consequences. The judgment further confirms that the UAE legal system views the protection of reputation and privacy as interests deserving robust legal protection in digital environments.

Taken together, these decisions demonstrate the UAE judiciary's commitment to enforcing substantive content standards and protecting individual and institutional interests against harmful online conduct. They confirm that digital speech is not treated as a legally exceptional category but is subject to ordinary principles of liability adapted to the realities

17 Reda Hegazy, Mohamed Elimam and Ahmed Adel, 'Defamation Has a Price: Alsuwaidi & Company Recovers AED 250,000 for Client in Social Media Defamation Case' (*Alsuwaidi & Company*, 22 May 2026) <<https://alsuwaidi.ae/defamation-has-a-price-alsuwaidi-company-recovers-aed-250000-for-client-in-social-media-defamation-case/>> accessed 5 January 2026.

18 Enas Mohammed Alqodsi, 'Teacher Civil Liability in the Case of Breaching Educational and Control Obligations' in Asma Khaleel Abdallah and Ahamed M Alkaabi (eds), *Restructuring Leadership for School Improvement and Reform* (IGI Global 2023) 327.

of modern communication technologies. At the same time, the cases reveal that the UAE model remains primarily focused on regulating user-generated content and imposing liability upon content creators rather than developing a comprehensive intermediary liability framework for platform operators. Consequently, while the current framework provides strong mechanisms for controlling harmful content and protecting reputation, privacy, and public order, it leaves important questions concerning platform accountability and intermediary responsibility relatively underdeveloped.

4 PROCEDURAL GAPS AND ACCESS TO JUSTICE CHALLENGES

The UAE has responded proactively to the growing challenges posed by social media platforms and digital communications by implementing a comprehensive legislative framework to protect privacy, reputation, public order, and societal interests. Federal Decree-Law No. 34 of 2021 on Combating Rumors and Cybercrimes criminalises a wide range of harmful online activities, including the dissemination of false information, violations of privacy, digital defamation, and other unlawful online conduct. These provisions operate alongside broader civil and criminal liability mechanisms, creating a robust legal framework capable of addressing the risks associated with contemporary digital communication. Consequently, the UAE model reflects a strong commitment to ensuring responsible online behaviour while safeguarding legally protected rights and interests.

The effectiveness of this framework is further demonstrated through judicial practice. UAE courts have consistently affirmed the enforceability of substantive content standards and adopted a strict approach to conduct that infringes on privacy, damages reputation, or threatens public order. A widely cited example is the 2015 case involving an Australian resident who faced legal proceedings after publishing a photograph on Facebook documenting a parking violation. Although the publication was motivated by concerns regarding public conduct, the authorities considered the dissemination of the image to constitute a violation of privacy protections under applicable UAE legislation. The case attracted significant international attention and illustrates the importance that UAE law attaches to protecting personal privacy and to the responsible use of digital platforms. More broadly, it demonstrates the State's determination to ensure that technological developments and social media engagement remain consistent with legal and ethical standards governing online conduct.

From a procedural perspective, the UAE legal system provides individuals with access to judicial remedies through the ordinary court system, while enforcement actions remain subject to established legal procedures and judicial oversight. Individuals affected by unlawful online content may pursue both criminal complaints and civil claims, and courts possess broad powers to provide appropriate remedies where legal rights have been violated. Accordingly, procedural safeguards are not absent from the UAE framework;

rather, they operate through the broader judicial and administrative structure governing civil, criminal, and cybercrime disputes.

This position is consistent with access-to-justice scholarship, which emphasises that the effectiveness of legal protection depends not only on the existence of substantive rights but also on the availability of mechanisms enabling individuals to enforce those rights and obtain meaningful remedies.¹⁹ In this respect, the UAE legal system already provides multiple avenues through which affected parties may seek legal protection and challenge unlawful conduct. Nevertheless, the increasing complexity of digital platforms and online content moderation raises new questions regarding the visibility, accessibility, and procedural clarity of these mechanisms in highly digitalised environments.²⁰ The need to reassess traditional legal concepts in response to technological transformation has been recognised in UAE legal scholarship, which has highlighted the limitations of conventional legal frameworks when applied to emerging digital environments.²¹ This need for procedural clarity is closely connected to the broader principle of legality, which requires that legal rules be sufficiently clear, predictable, and capable of guiding individual conduct. Although Al-Shawabkah's analysis was developed in the context of tax regulation, his discussion of legality and propriety remains relevant to regulatory frameworks more generally, particularly where legal obligations may significantly affect individual rights and liabilities. In the context of digital regulation, these principles support the argument that individuals should be able to understand not only the substantive limits of online conduct but also the procedural avenues available for challenging enforcement measures or seeking remedies.²²

Comparative developments provide useful insights in this regard. In *Delfi AS v. Estonia* (2015), the ECtHR recognised the legitimacy of imposing liability for harmful online content while emphasising the importance of balancing regulatory objectives with procedural safeguards and effective judicial review.²³ Similarly, in *Magyar Tartalomszolgáltatók Egyesülete and Index.hu Zrt v. Hungary* (2016), the Court stressed that liability frameworks governing digital communications should be accompanied by

19 Emad Abdel Rahim Dahiyat, 'A Legal Framework for Online Commercial Arbitration in UAE: New Fabric but Old Style!' (2017) 26(3) *Information and Communications Technology Law* 272, doi:10.1080/13600834.2017.1374055.

20 Mauro Cappelletti and Bryant Garth, 'Access to Justice: The Newest Wave in the Worldwide Movement to Make Rights Effective' (1978) 27 *Buffalo Law Review* 181.

21 Emad Abdel Rahim Dahiyat, 'The Legal Recognition of Online Brokerage in UAE: Is a Conceptual Rethink Imperative?' (2016) 25(2) *Information and Communications Technology Law* 173, doi:10.1080/13600834.2016.1184455.

22 Ibrahim Kamil Al-Shawabkah, 'Sales Tax Law in Jordan: Questions of Legality and Propriety' (2010) 24(2) *Arab Law Quarterly* 209, doi:10.1163/157302510X12607945807313.

23 *Delfi AS v Estonia* App no 64569/09 (ECtHR, 16 June 2015) <<https://hudoc.echr.coe.int/fre?i=001-155105>> accessed 5 January 2026.

mechanisms that ensure proportionality, legal certainty, and effective access to remedies.²⁴ More recent European initiatives, including the Digital Services Act, have further reinforced the role of transparency obligations, complaint mechanisms, and structured review procedures within digital governance frameworks.

Viewed from this perspective, the UAE framework already provides strong substantive protection and meaningful avenues for judicial recourse. However, as digital ecosystems continue to evolve, there remains an opportunity to further strengthen procedural clarity through more explicit notice requirements, enhanced transparency obligations, structured appeal mechanisms, and clearly articulated standards of review in content-related disputes. Such developments would not alter the fundamental policy objectives of UAE digital regulation; rather, they would complement existing protections by enhancing accessibility, predictability, and legal certainty for individuals operating within increasingly complex digital environments.

Accordingly, the UAE regulatory model should be understood not as lacking procedural safeguards, but as a framework that has successfully prioritised the protection of privacy, reputation, and public order while retaining significant potential for further procedural refinement. Strengthening procedural visibility and accessibility would enhance access to justice and contribute to a more balanced approach among regulatory effectiveness, individual rights, and technological innovation.

5 REFLECTIONS AND PERSPECTIVES

This study has examined the evolving regulation of social media content in the United Arab Emirates and assessed its implications for access to justice in the digital environment. While UAE legislation establishes comprehensive substantive standards to protect public order, privacy, and societal values, the analysis demonstrates that procedural safeguards remain comparatively underdeveloped. To strengthen meaningful access to justice in digital content disputes, several targeted reforms may be considered. Legislation should codify structured notice-and-response procedures to ensure that individuals affected by unlawful content or regulatory action are granted a clear right to be heard before sanctions are imposed.

The introduction of explicit appeal mechanisms and time-bound administrative review procedures would further enhance transparency and legal certainty. In addition, clarifying judicial oversight standards, particularly in cases involving restrictions on freedom of expression, is essential to ensure proportionality and consistency with constitutional principles. Regulatory authorities should also adopt enhanced transparency obligations, including publishing enforcement guidelines and anonymised decision summaries, in line with emerging international practices.

24 *Magyar Tartalomszolgáltatók Egyesülete and Index.hu Zrt v Hungary* App no 22947/13 (ECtHR, 2 February 2016) <<https://hudoc.echr.coe.int/eng?i=001-160314>> accessed 5 January 2026.

Such reforms would not undermine the protective objectives of UAE media legislation. Rather, they would reinforce its legitimacy by balancing regulatory enforcement with procedural fairness. Strengthening these safeguards would enhance public trust, improve legal certainty, and align national regulation with evolving global standards of digital governance.

This study is subject to certain limitations. It adopts a doctrinal legal approach and does not incorporate empirical data on enforcement practices or user experiences. In addition, the comparative analysis is limited to selected European standards used as normative benchmarks rather than to a full structural comparison. These limitations may affect the generalizability of the findings but do not undermine the relevance of the reform-oriented conclusions.

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АНОТАЦІЯ УКРАЇНСЬКОЮ МОВОЮ

Нотатка

ПРОЦЕСУАЛЬНІ ПРОГАЛИНИ В РЕГУЛЮВАННІ СОЦІАЛЬНИХ МЕРЕЖ ОАЕ: ДОСТУП ДО ПРАВОСУДДЯ ТА ПЕРСПЕКТИВИ РЕФОРМ

Хабіба Аль-Шамісі

АНОТАЦІЯ

Вступ. Швидке поширення платформ соціальних мереж суттєво змінило суспільний дискурс та управління медіа, створюючи складні правові виклики щодо регулювання контенту та доступу до правосуддя. В Об'єднаних Арабських Еміратах (ОАЕ) Федеральний декрет-закон № 55 від 2023 року є важливим законодавчим зрушенням, спрямованим на модернізацію регулювання медіасфери в цифрову епоху. Проте залишаються питання щодо достатності процесуальних гарантій, доступних особам, які постраждали від незаконного або шкідливого онлайн-контенту. Це дослідження оцінює ефективність нормативно-правової бази ОАЕ у забезпеченні дієвого доступу до правосуддя у спорах щодо контенту в соціальних мережах та визначає сфери, які потребують законодавчого реформування.

Методи: В аналізі застосовується доктринальний підхід із зосередженням на правовій системі ОАЕ та з обмеженим порівняльним зверненням до європейських нормативних стандартів, зокрема Акту про цифрові послуги (Digital Services Act) та відповідної судової практики Європейського суду з прав людини (ЄСПЛ).

Результати та висновки: Дослідження виявляє прогалини в прозорості, механізмах оскарження, судовому контролі та процесуальній ясності, які можуть обмежувати ефективний захист користувачів. Цілеспрямовані реформи, зокрема посилення процесуальних гарантій та механізмів незалежного перегляду, є необхідними для підвищення правової визначеності та збалансування свободи вираження поглядів із захистом індивідуальних прав у цифровому середовищі ОАЕ.

Ключові слова: доступ до правосуддя; процесуальні гарантії; регулювання соціальних мереж; Об'єднані Арабські Емірати; цифрові механізми правозастосування.

ABSTRACT IN ARABIC*

الحالة مذكرة

الفجوات الإجرائية في تنظيم وسائل التواصل الاجتماعي في دولة الإمارات العربية المتحدة: الوصول إلى العدالة وآفاق الإصلاح

حبيبة الشامسي

الخلفية:

أدى التوسع المتسارع لمنصات التواصل الاجتماعي إلى إحداث تحولات جوهرية في الخطاب العام وحوكمة الإعلام، مما أفرز تحديات قانونية معقدة تتعلق بتنظيم المحتوى وضمان الوصول إلى العدالة. وفي دولة الإمارات العربية المتحدة، مثل المرسوم بقانون اتحادي رقم (55) لسنة 2023 بشأن تنظيم الإعلام تطوراً تشريعياً مهماً يهدف إلى تحديث الإطار القانوني المنظم للإعلام في البيئة الرقمية. ومع ذلك، لا تزال هناك تساؤلات حول مدى كفاية الضمانات الإجرائية المتاحة للأفراد المتضررين من المحتوى غير المشروع أو الضار عبر الإنترنت. وتتناول هذه الدراسة مدى فعالية الإطار التنظيمي

* The publication metadata in Arabic is presented as submitted by the authors.

الإماراتي في ضمان وصول فعال إلى العدالة في منازعات محتوى وسائل التواصل الاجتماعي، مع تحديد الجوانب التي تستدعي الإصلاح التشريعي.

:المنهجية

اعتمدت الدراسة المنهج التحليلي القانوني (الفقهي) من خلال تحليل النصوص التشريعية الإماراتية ذات الصلة، مع الاستعانة بمقارنات محدودة مع بعض المعايير التنظيمية الأوروبية، وعلى وجه الخصوص قانون الخدمات الرقمية للاتحاد الأوروبي (Digital Services Act) والاجتهادات القضائية ذات الصلة الصادرة عن المحكمة الأوروبية لحقوق الإنسان.

:النتائج والاستنتاجات

أظهرت الدراسة وجود عدد من الفجوات الإجرائية المتعلقة بالشفافية، وآليات التظلم والطعن، والمراجعة القضائية، ووضوح الإجراءات، بما قد يحد من فعالية حماية المستخدمين في البيئة الرقمية. وتخلص الدراسة إلى ضرورة تبني إصلاحات تشريعية موجهة لتعزيز الضمانات الإجرائية وآليات المراجعة المستقلة، بما يساهم في تحقيق قدر أكبر من اليقين القانوني والتوازن بين حرية التعبير وحماية الحقوق الفردية في دولة الإمارات العربية المتحدة.

:الكلمات المفتاحية

تحقيق العدالة؛ الضمانات الإجرائية؛ تنظيم وسائل التواصل الاجتماعي؛ الإمارات العربية المتحدة؛ آليات الإنفاذ الرقمي