

Policy-as-Prompt

Rethinking Content Moderation in the Age of LLMs

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FAccT 2025, Athens



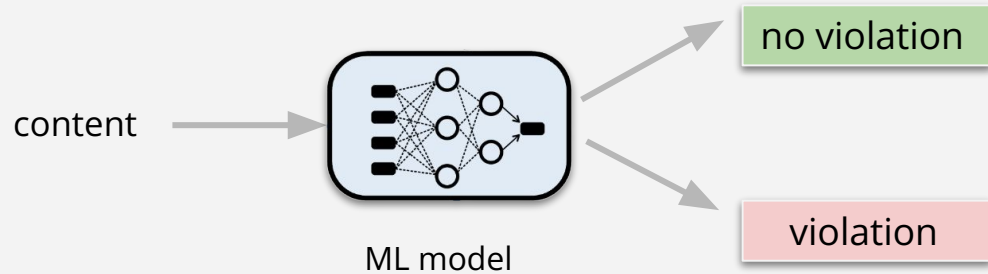
Work done with José Luis Garcia, Claudia Hauff, Francesco Fabbri, Henrik Lindström,
Daniel R. Taber, Andreas Damianou, Mounia Lalmas

Content Moderation*

Ensure safe and inclusive online environments

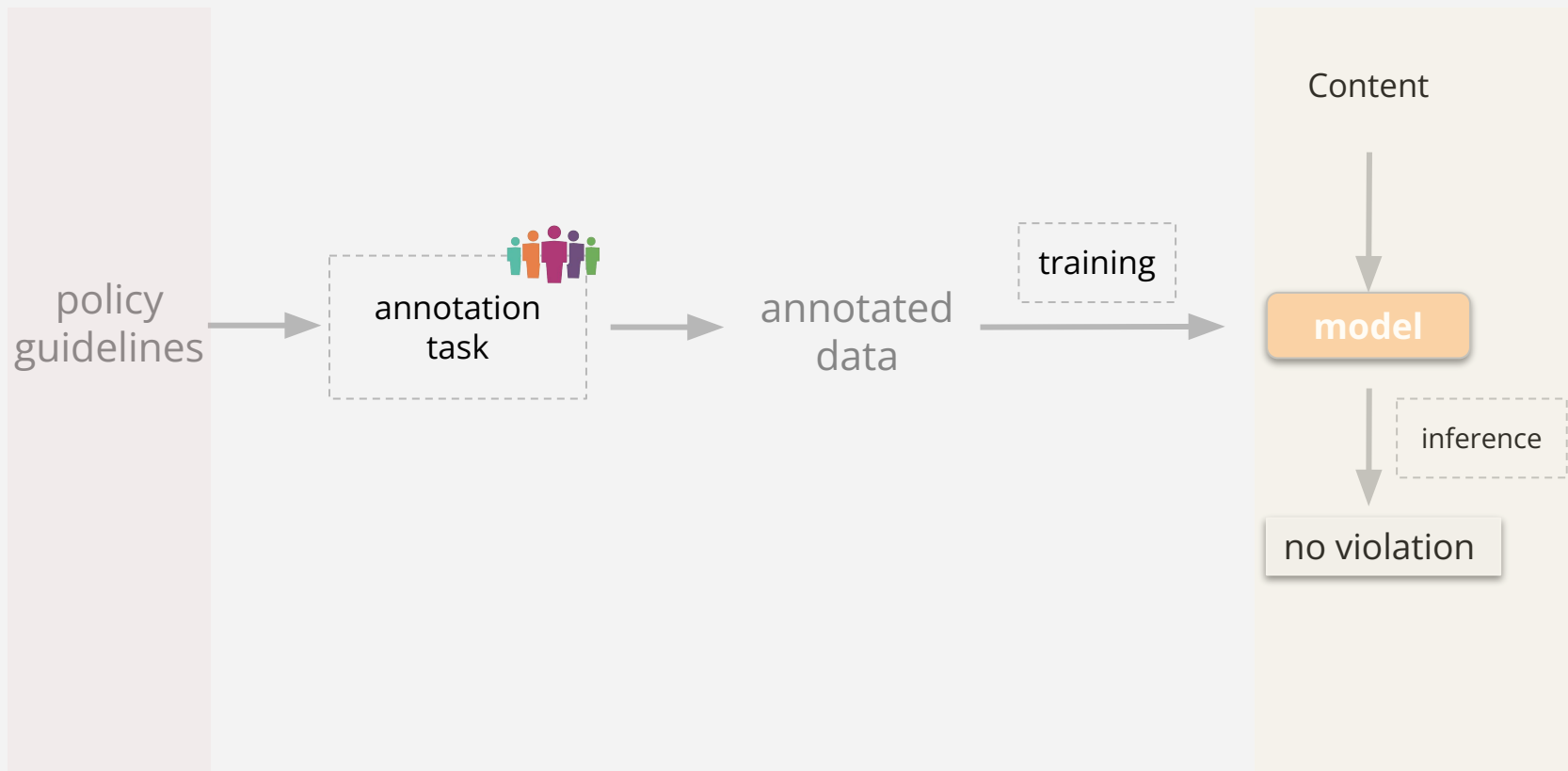
Balance platform standards, user expectations, and regulations

Focus: on AI-assisted content moderation

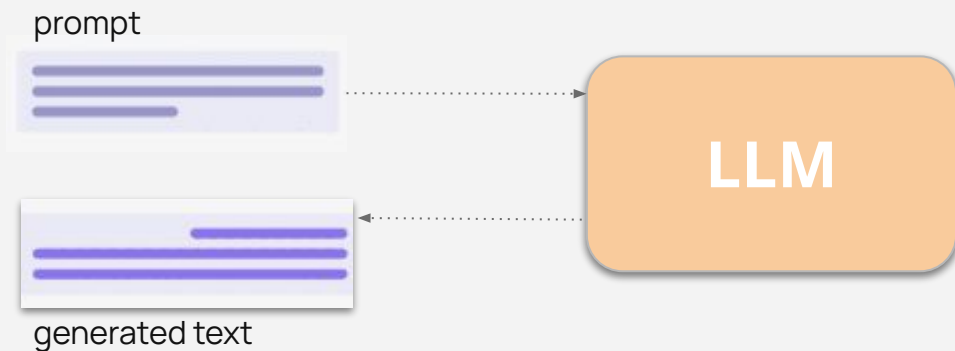


* "content moderation" is used as a broad term encompassing both traditional moderation (decisions about allowing or disallowing content on a platform) and content sensitivity management.

Content Moderation: The ML (*traditionally*)



Prompting large language models

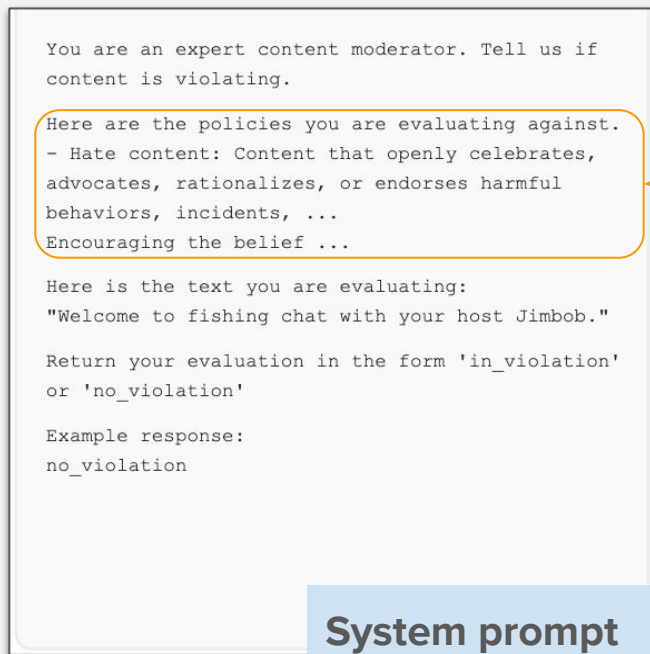


Prompt: input text that guides the model's response.

Allows for direct interaction with the model.

Prompts for *Safety alignment*

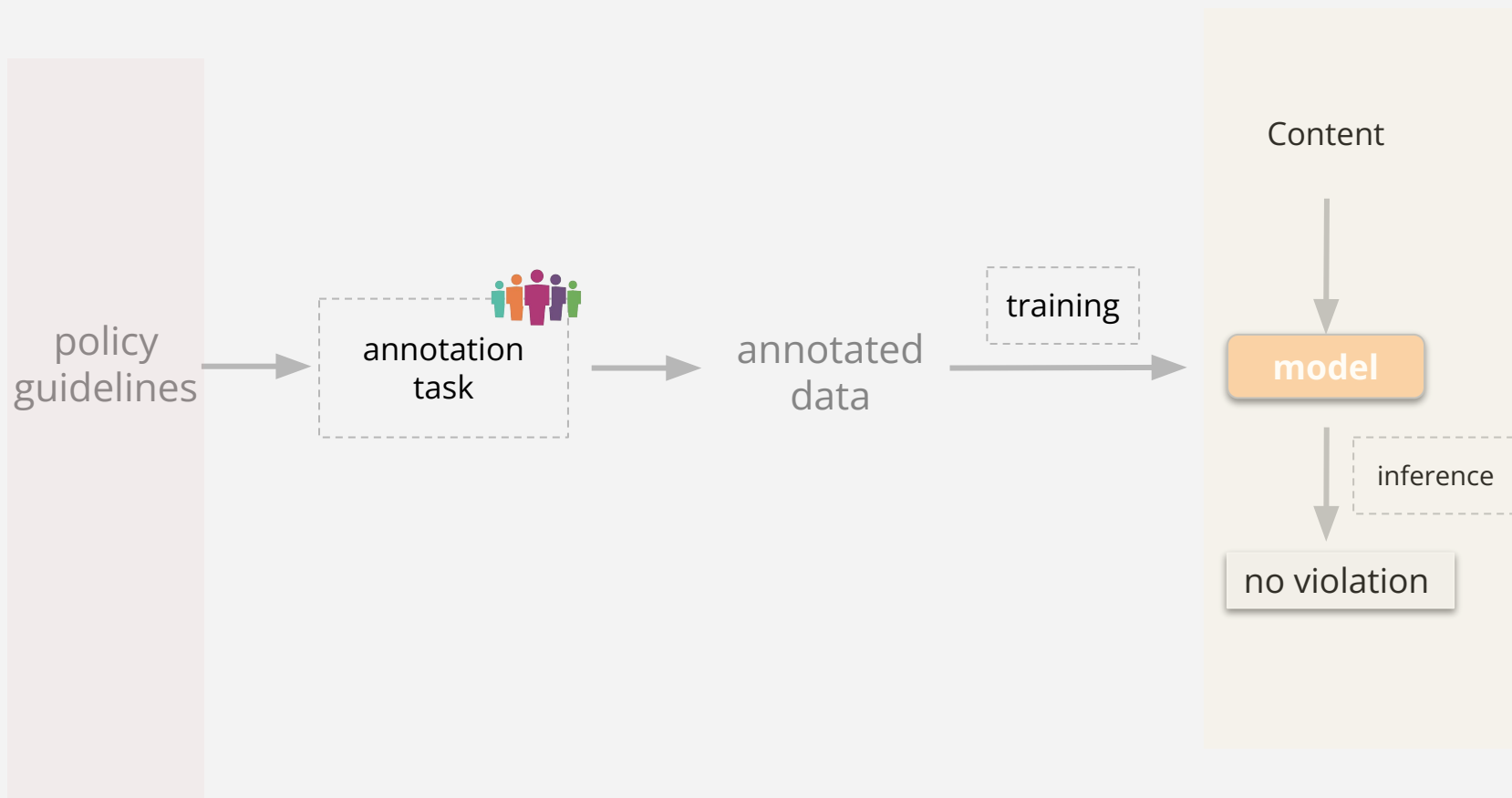
Policy Guidelines in prompt



Policy
description

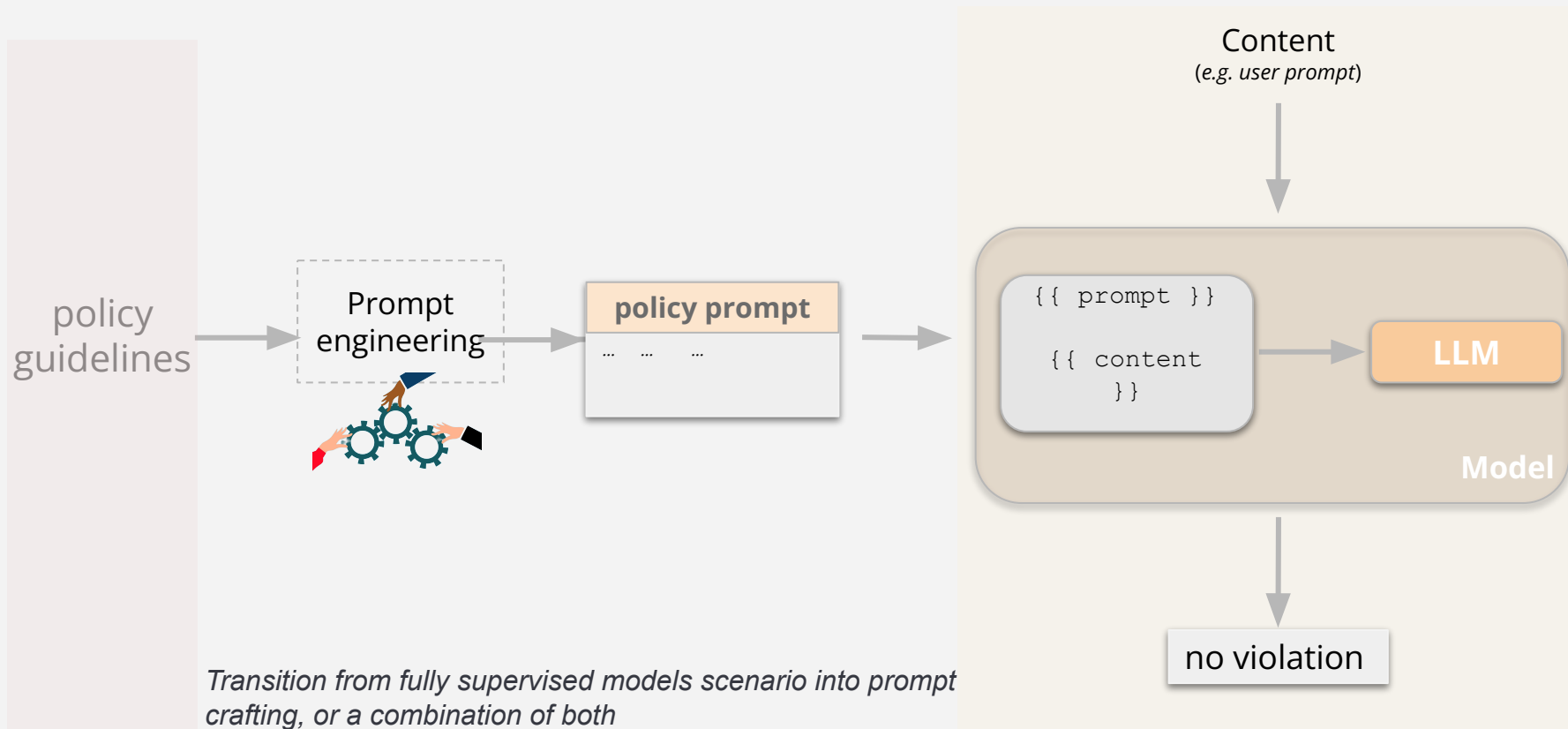
LLM

Content Moderation: The ML (*traditionally*)



Content Moderation

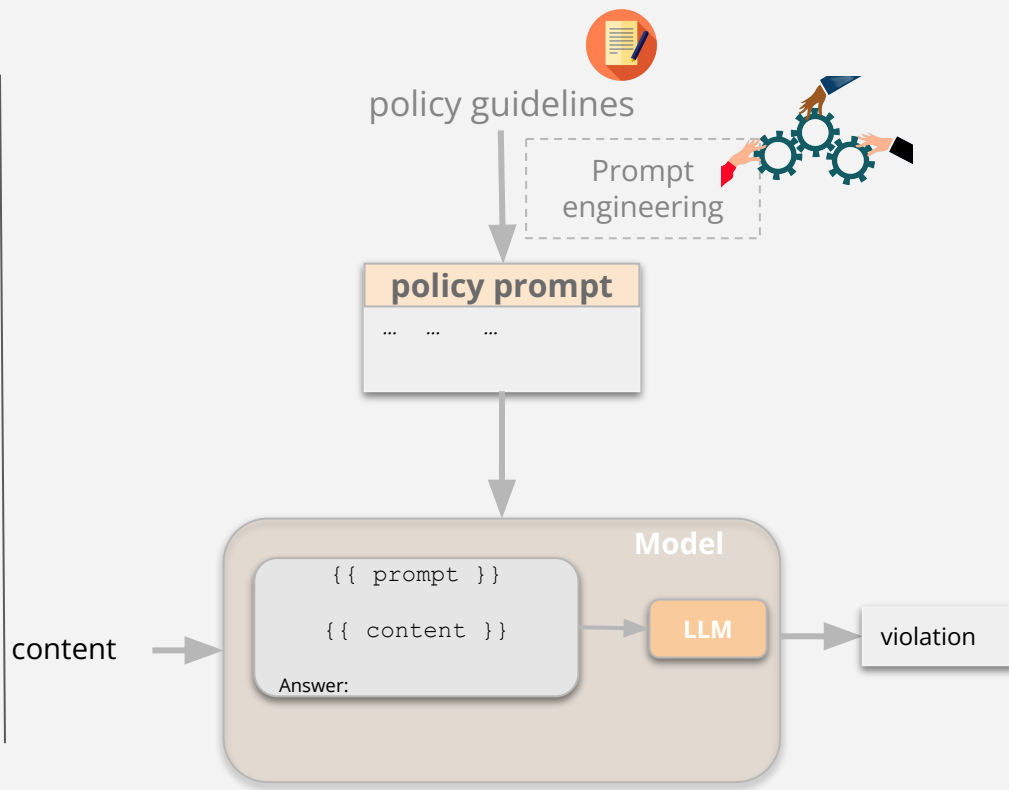
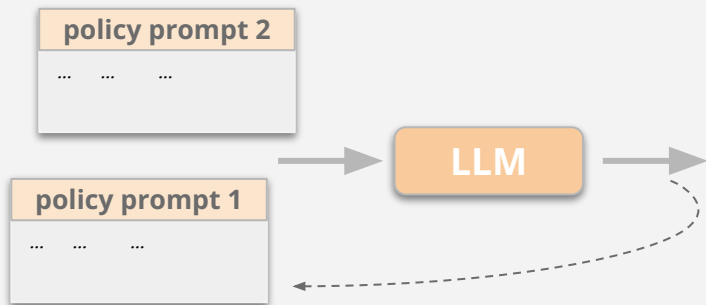
the new paradigm; *Policy-as-Prompt*



Policy-as-Prompt: the benefits

Ability to interpret policy *directly from text* - No (re)training required

Increased *flexibility* and *adaptability* in moderation (prompt modifications)



Challenges

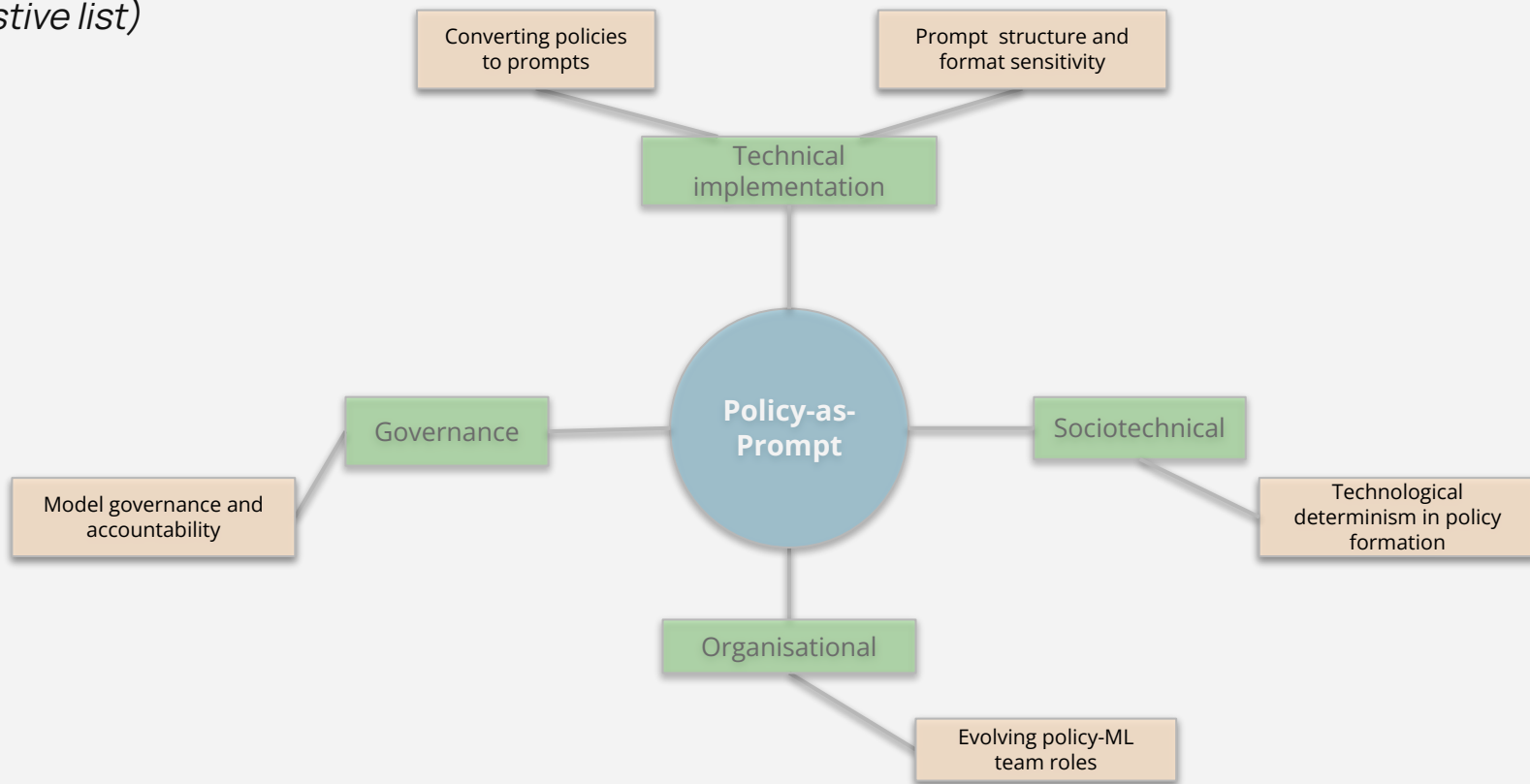
Things we need to consider to effectively
apply Policy-as-Prompt;

minimise risks and maximise benefits



Challenges in Transitioning to Policy-as-Prompt

(not an exhaustive list)



Area

Technical Implementation

How can we ensure that policy prompts accurately reflect moderation guidelines?

How can we ensure that policy prompts remain robust to formatting variations that significantly impact LLM behavior?

Traditional Supervised Approach

- Policies written exclusively for human interpretation
- Formalized across
 - Written policies, annotator guidelines, labeled training data

Challenge

Converting policies to prompts

Policy-as-Prompt Approach

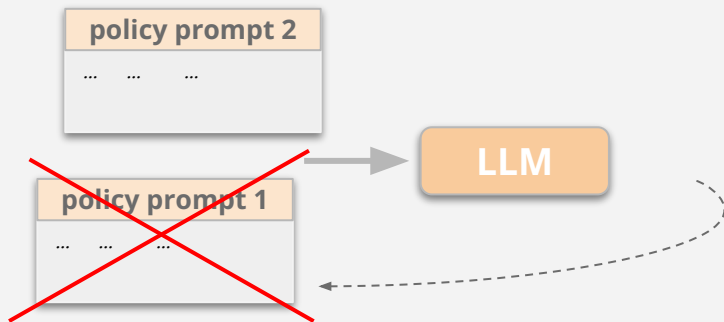
- Policies must be:
 - Human-readable
 - Machine-processable
- Full policy intent captured in a single prompt

Area

Technical Implementation

How can we ensure that policy prompts accurately reflect moderation guidelines?

How can we ensure that policy prompts remain robust to formatting variations that significantly impact LLM behavior?



Challenge

Converting policies to prompts

Verification Complexity

Prompt engineering relies on trial-and-error

LLMs struggle with nuanced contextual understanding

Subtle content detection is difficult

User request "**songs for a guilt-free feast**"

- Appears harmless
- Potential hidden reference to unhealthy eating habits

No human-annotated examples to learn from

Area

Technical Implementation

How can we ensure that policy prompts accurately reflect moderation guidelines?

*How can we ensure that policy prompts remain robust to **formatting variations that significantly impact LLM** behavior?*

The critical role of prompt engineering

Text formatting is not just about appearance

Crucial in how LLMs interpret policy guidelines

Challenge

Prompt structure and format sensitivity

LLM sensitivity

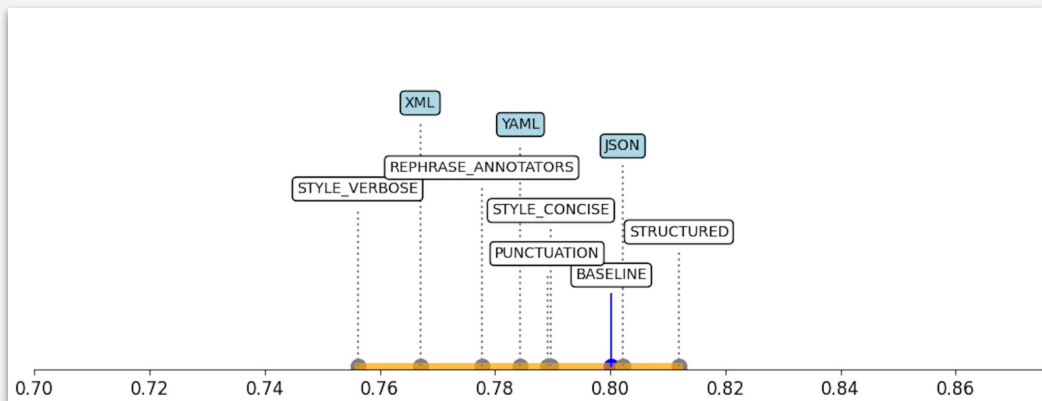
Performance varies based on:

- Input length
- Key information placement
- Formatting details
 - Whitespace
 - Capitalization...

Challenge

Prompt structure and format sensitivity

Experiment: Sensitivity to Prompt variations



Accuracy varies significantly across different prompt types (from 75% to 81%)

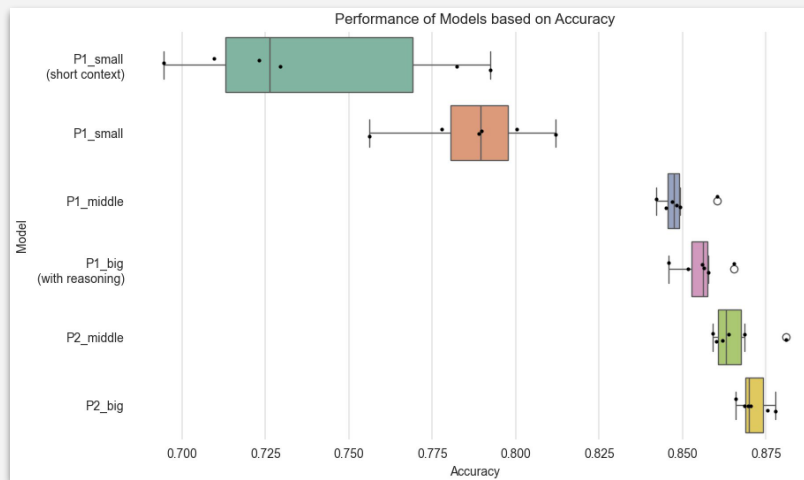
Structured prompts demonstrated the highest accuracy, highlighting model preference for organized information.

Verbose prompts had the lowest performance (bigger LLMs could potentially improve this)

Challenge

Prompt structure and format sensitivity

Experiment: Sensitivity to Prompt variations



Area

Sociotechnical

Does embedding policies directly into LLM prompts risk oversimplifying complex societal and cultural nuances in content moderation?

Challenge

Technological determinism in policy formation

Reversal of policy-technology relationship

Instead of technology serving policy goals, policies may be constrained by what LLMs can efficiently process. - **technological determinism**

Pressure for machine-readable guidelines

Experts may be “forced” to prioritise structured, rigid rules over nuanced, context-dependent policies.

Oversimplification of complex social issues

Risk of reducing intricate moderation challenges into binary or overly simplistic rationales.

Homogenisation of policies

Cultural and contextual diversity may be lost in favour of uniform, one-size-fits-all approaches.

Area Organisational

How does the shift to “Policy-as-Prompt” redefine the collaboration between policy teams and ML practitioners, and what new workflows are needed?

Challenge

Evolving policy-ML roles

Blurring of traditional roles

Policy authors need ML knowledge (e.g., prompt engineering).

ML practitioners engage in policy implementation.

Future Direction: “AI Policy Translators”

Area Governance

Challenge

Model governance and
accountability

How can we **ensure traceability** in “Policy-as-Prompt” moderation?

When moderation decisions lead to unintended outcomes, what is the **process for identifying** and addressing the issue?

Distributed responsibility

Trust & Safety defines policy intent, **ML engineers** structure prompts, **LLM providers** ensure contextual accuracy.

Challenges in issue resolution: *How to correct unintended moderation decisions?*

Requires cross-team collaboration: refining prompts, updating policies, or adjusting model behavior.

Complexity of documentation

Small prompt changes can impact enforcement.

Need to balance tracking modifications with operational efficiency.

Attribution & Documentation

Mitigation

Some strategies to mitigate the challenges



Enhanced Evaluation

Addresses Technical & Sociotechnical Challenges

Technical sensitivity analysis - Stress test diverse prompts

Evaluate impact of formatting, phrasing and structure

Report performance across multiple prompt styles

Identify cases where similar policy phrasing leads to divergent model responses (predictive multiplicity)

E.g. use **Rashomon sets** to detect inconsistencies in edge cases

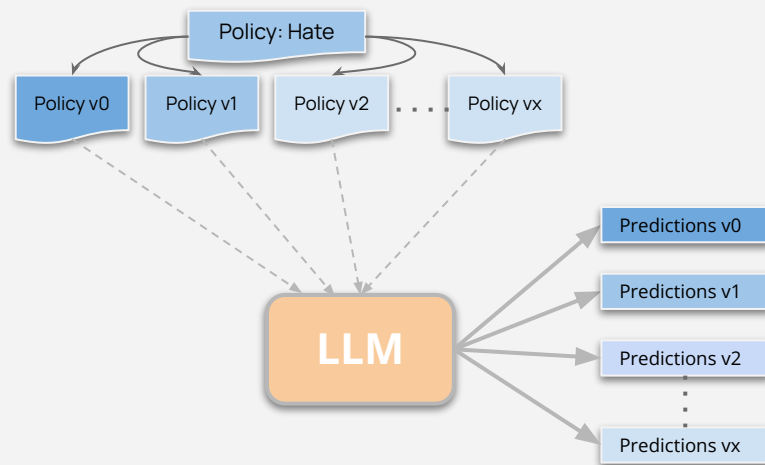
Sociotechnical evaluation

Beyond accuracy - assess societal readiness and adaptability

Use demographic fairness metrics to prevent disparities

Implement **case libraries** with real-world moderation edge cases to ensure nuanced, context aware decisions.

Mitigation Strategies
Enhanced Evaluation
Enhanced Prompt Engineering
Traceability of Prompts
Bridging Organisational Silos



Enhanced Prompt Engineering

Addresses Technical Challenges

Mitigation Strategies
Enhanced Evaluation
Enhanced Prompt Engineering
Traceability of Prompts
Bridging Organisational Silos

Minimising machine misinterpretation → Craft prompts that capture multi-faceted content perspectives

Techniques:

Chain-of-thought reasoning, Meta-Prompting, Multi-Persona Reasoning ...

Collaborative Feedback loop (- future)

Diverse LLMs to contribute to policy interpretation, mitigating biases and refining prompts.

Feedback loop - AI-assisted rewrites: LLMs suggest rewrites, identify gaps, loop for continuous improvement

Traceability of Prompts

Addresses Governance Challenges

Mitigation Strategies
Advanced Evaluation
Enhanced Prompt Engineering
Traceability of Prompts
Bridging Organisational Silos

Enhancing transparency and accountability

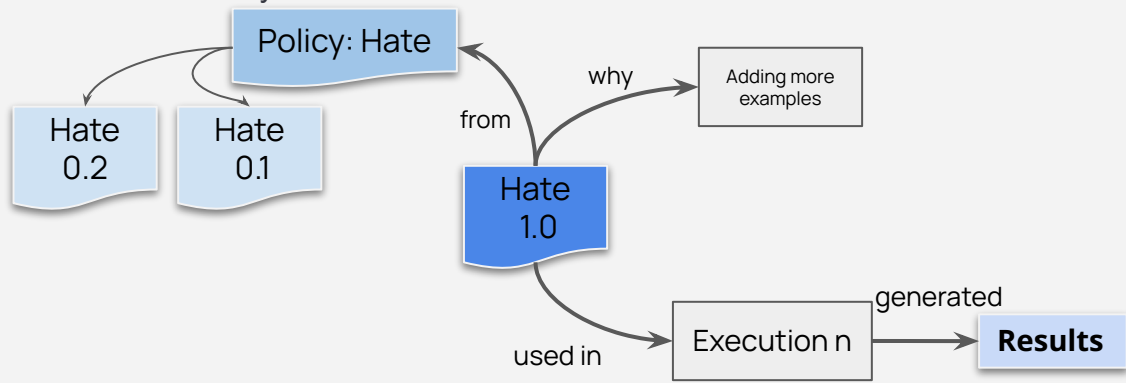
Implement a “**prompt genealogy**”; track changes in prompt structure, phrasing, rationale.

e.g. a version control system for prompts, similar to DVC and Pachyderm.

Key Features

Logs inputs, policy references and outputs for structured analysis

Support **audit trails, reproducibility**.



Bridging Organisational Silos

Addresses Organisational Challenges

ML practitioners vs Policy Authors

Joint working sessions, shared documentation practices, established feedback loops...

Long-Term vision: Develop **unified roles** that integrate policy and machine learning expertise

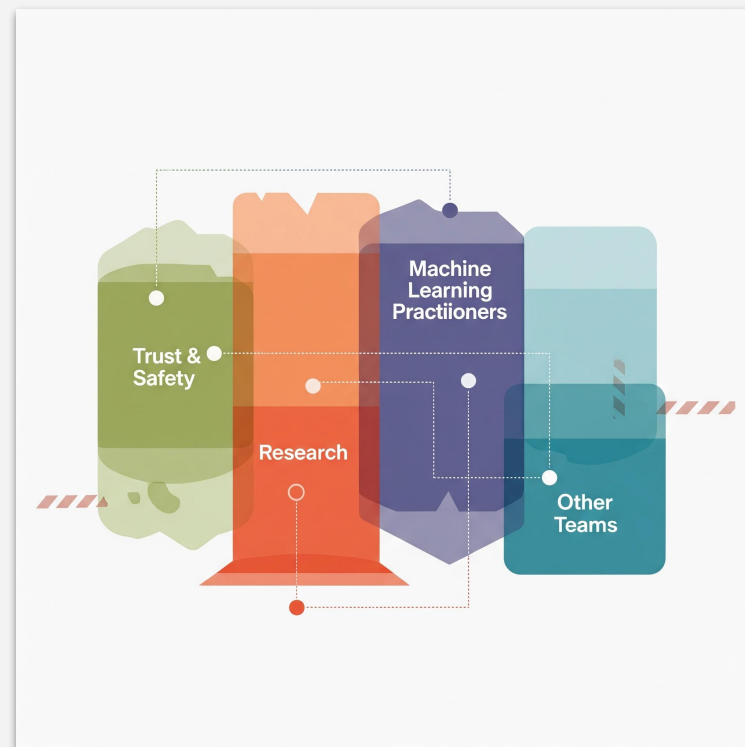
Mitigation Strategies

Advanced Evaluation

Enhanced Prompt Engineering

Traceability of Prompts

Bridging Organisational Silos



Conclusions

Hybrid systems today → Potential for autonomy tomorrow

LLMs currently assist moderation with human oversight and fine-tuned setups.

Transitioning to higher autonomy introduces **new** complexities & risks.

Path forward

Policy-as-Prompt enables dynamic, adaptable moderation frameworks.

Continued research needed to:

- address open challenges,
- improve model reliability, fairness and consistency

Read more about our work

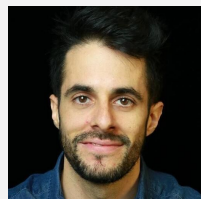
Arxiv preprint (arXiv:2502.18695): [*"Policy-as-Prompt: Rethinking Content Moderation in the Age of Large Language Models"*](#)

Come and chat with me



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The team



José Luis Garcia



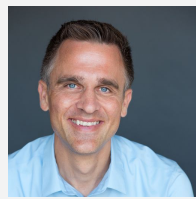
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