COFACE Families Europe contribution to the European Commission's Call for Evidence on the Action Plan against cyberbullying

29 September 2025

Introduction

COFACE Families Europe is a pluralistic network with 50+ member organisations in 25 European countries which represents millions of families, volunteers, and professionals. Based on a multi-generation approach, COFACE member organisations respond at national or regional level to the needs of all families, without discrimination. COFACE and its members have been working for many years on preventing and tackling (cyber-)bullying, and welcome this opportunity to provide recommendations and further evidence for the upcoming Action Plan against Cyberbullying.

General recommendations

1. Definition of cyberbullying

Cyberbullying can take many forms (such as insults, spreading rumours, posting offensive and humiliating photos and videos), is often more vicious because offenders can hide behind digital identities, and their actions can be disseminated widely. The definition of cyberbullying should be broad and flexible enough to cover different environments where cyberbullying can take place and to be future proof for technological developments. Special attention should be paid to how emerging technologies may facilitate cyberbullying, especially Artificial Intelligence and Virtual/Augmented Reality[1], and to bullying which occurs in online multiplayer videogames.

A distinction should be made between threats and attacks which put people's life and physical integrity at risk and require legal measures, and offensive messages and behaviours which need less restrictive measures.

2. Vulnerabilities and intersectionality

COFACE welcomes that the plan will focus on minors, and will consider the gender dimension, as well as young people in vulnerable situations, such as those with disabilities, LGBTIQ+ people, and those with a migrant background.[2] Data from the OECD shows that, in most countries, girls are more likely to report cyberbullying victimisation.[3] Furthermore, it shows that 10-year-olds from a low socio-economic background are twice as likely to report cyberbullying as those from a high socio-economic background.

---

[1] See with regard to Virtual Reality: Center for Countering Digital Hate, Facebook's Metaverse, 2021.

[2] On preventing sexual cyberbullying of people with intellectual disabilities: KMOP Skopje, Priscilla Project 2024-2027.

[3] OECD, How's Life for Children in the Digital Age?, 2025, doi:10.1787/0854b900.

Similarly, schoolchildren living in a one-parent or non-traditional family were more likely to report cyberbullying than those living in a two-parent family.

Overlapping vulnerabilities exist and should be taken into account in the Action Plan. Research has shown, for example, that women and girls who are racialised, have a disability and/or identify as LGBTIQ+ are more targeted by online gender-based violence than other women and girls.[4] For support services to be effective and truly inclusive, they must explicitly recognise these intersecting vulnerabilities.

3. Family diversity

To prevent and tackle cyberbullying, a holistic approach is needed to involve and empower the whole community surrounding children and young people. Families play an important role in this and all family members should be empowered to recognise the first signs of (cyber-)bullying, and to know how to act if it occurs, whether their child is a victim, a perpetrator or a bystander. Families are diverse, and especially families in more vulnerable situations are often more difficult to reach. Additionally, as regards prejudice and discrimination, instances of bullying against children from diverse families remain. Family organisations like those represented in the COFACE network can help to reach these families and provide them with the right support.

4. Alignment with other EU Frameworks

COFACE welcomes that the Action Plan will build further on existing initiatives, like the ones mentioned in the call for evidence, and commit to provide a harmonised definition of cyberbullying at EU level. However, it is also important that the Action Plan will align and complement with other EU initiatives, such as the Gender Equality Strategy, the LGBTIQ Equality Strategy, the Strategy for the Rights of Persons with Disabilities, the Strategy on the Rights of the Child, the Victims' Rights Strategy, as well as the European Pillar of Social Rights which focuses on quality and inclusive education.

Recommendations for key actions

1. Prevention and education

- **Member States should incorporate human rights education into school curricula and promote inclusive school environments.** Children are often unaware of their own rights and those of others. Human rights education can help to create a universal culture of human rights and empower children to promote and protect them. Additionally, the EU and its Member States should invest in inclusive school environments. The EU should implement comprehensive anti-discrimination measures and sensitivity training for educators, including intersectional approaches in teacher training, to help build communities where all children are treated equally regardless of their family setting, ethnicity, disability, gender, and sexual orientation.[5]

---

[4] UNFPA, Technology-facilitated Gender-based Violence: Making All Spaces Safe, 2021.
[5] See also COFACE's response to the EU public consultation on the Action Plan to implement the European Pillar of Social Rights: COFACE responds to EU public consultation on social rights action plan | COFACE Families Europe.

- **Member States should incorporate digital literacy and social and emotional learning into school curricula.** Promoting digital, social and emotional skills from an early age, adapted to the different stages of children's lives, is a fundamental mechanism for preventing (cyber)bullying. Research has documented that even if digital technologies are transforming the lives of most children and young people, some are at a high risk of being left behind. 5.4 percent of children in Europe are digitally deprived.[6] Disparities in access to technology and digital skills persist across Member States and socioeconomic groups. Continued efforts are needed to bridge these gaps and ensure equitable access to education and digital resources for all, providing more accessible and inclusive upskilling opportunities for all skill levels and backgrounds.
- **Public authorities in the education and social fields should provide clear guidelines** to education institutions (formal and non-formal) on setting up plans to address and prevent bullying, and how to work in partnership with community and (mental) health organisations.
- **The EU and its Member States should invest in training and awareness-raising for parents, caregivers and frontline professionals (including teachers, social workers, health staff and police) to recognise the first signs of cyberbullying.** Through targeted training, these adults and peers can better recognise early warning signs, respond with sensitivity, and provide safe spaces for victims to disclose what they are experiencing.

2. **Support and response**

- **The EU and its Member States should invest in inclusive, age-appropriate, trauma-informed, user-friendly, free, confidential, sustained support services** which is available to all victims of cyberbullying. The support given must be coordinated across health, education, justice, and social services.
- **The EU and its Member States should promote a culture of reporting and positive bystander behaviours** in schools, educational systems, and sports and cultural associations.
- **The Action Plan should include a stream of family support**. All families should have access to resources on how to deal with cyberbullying, both when their child is a victim or a perpetrator. Family organisations, like those represented in the COFACE network, can provide resources and tools to families. To guarantee continued support, these organisations need to be adequately funded.

3. **Role of online platforms**

- **Online platforms, including gaming platforms, should invest and ensure specific safeguards to protect children and young people from cyberbullying**, including age-appropriate safety features, especially reporting tools, keyword blocking and content moderation technology. Special attention should be paid to how emerging technologies may facilitate cyberbullying, especially Artificial Intelligence and Virtual/Augmented Reality, which should be designed with child safety and privacy by default.
- **Online platforms must ensure that their reporting tools are accessible, especially for children and young people with disabilities, and age-appropriate.** Victims should receive feedback on the

---

[6] DigiGen, Digitally deprived children in Europe, 2021.

outcome of their report and platforms should ensure the prompt removal of harmful content and conduct.

4. **Data, monitoring and evaluation**

- **Member States should be encouraged to gather disaggregated data on cyberbullying** broken down by age, gender, sexual orientation, disability, socio-economic status and ethnicity. This will improve our understanding of who is most affected, enabling us to target prevention and support measures accordingly. Data collection should also consider how these factors can interact to create additional vulnerabilities.
- **The Action Plan should encourage the funding of research on new forms of online abuse** (such as the use of deepfakes, AI-driven bullying) through, for example, a European observatory on cyber-bullying.

5. **Quality standards and implementation**

- **The Action Plan should encourage the drafting of a Code of Conduct for online platforms** on how to prevent and combat cyberbullying. The Code should ensure that the design of online services does not foster a culture of bullying and that there is a clear and accessible reporting mechanism.
- **The Commission should consider setting up a cyberbullying platform which meets to share expertise and monitor implementation of the Action Plan.** Stakeholders of the platform should include civil society organisations, national authorities, researchers and online platforms. The Commission should support structured peer exchanges between governments on good practice in tackling cyberbullying.
- **Implementation of the Action Plan requires sufficient funding.** The ESF+ should be used to boost support to families and children on preventing and tackling cyberbullying.

Good practices from the COFACE network

For many years, COFACE Families Europe and its members have been working to prevent and tackle (cyber-)bullying. This has been achieved through campaigns[7], as well as by providing educational tools for teachers, educators and families. Below are some of the good practices within the COFACE network on preventing and tackling (cyber-)bullying.[8]

1. **School Bullying Management Course for educators and families**

The L.I.N.K. (Learning and Innovating through New Knowledge) programme is a result of the collaboration between COFACE Families Europe and COFACE member KMOP's Education Hub. L.I.N.K. educational tools and courses are based on values of human rights, non-discrimination, gender equality, social

---

[7] See for example: DeleteCyberbullying Campaign ran by COFACE in 2013.
[8] More practices of the COFACE network that contribute to developing more safe and empowering online experiences for families can be found in the COFACE Safer Internet Policy Brief: COFACE, Supporting Families in the Digital Era, 2024.

inclusion, diversity, empowerment, and intergenerational solidarity, and are designed for contributing to addressing important challenges that modern societies face. As part of the programme, COFACE and KMOP developed an e-learning course together on school bullying management, targeting teachers and educators.[9] The course covers various topics, including the definitions of bullying, the factors that contribute to it, the signs and consequences of bullying, and how to prevent and tackle it. A second online course on managing bullying will be launched by the end of 2025 and will be addressed to parents and guardians, with the aim of helping them talk to their children about bullying, whether they are victims or perpetrators.

2. EU-funded projects on child sexual abuse and cyberbullying

KMOP partnered in a project under the European Union Internal Security Fund (ISF) called "Child Sexual Abuse Prevention and Education" (CSAPE 2022-2024). The project aimed to contribute to the prevention of child sexual abuse by equipping children, parents, and professionals with knowledge and skills.[10] The programme offered evidence-based sexual education tailored for different age groups, aiming to enhance awareness of online dangers and available reporting mechanisms. In the framework of the project, partners conducted quantitative research to map the attitudes and practices of children concerning their online behaviour, ability to recognise potentially dangerous situations online, and awareness of available reporting and support mechanisms in case of online abuse in their respective countries.[11] In the framework of the project, partners also developed brochures for children, young people and professionals, as well as informative materials for young people and parents.

KMOP is currently partnering in the Erasmus+ SafeOnline project which aims to enhance students' skills to effectively respond to cyberbullying, empower educators to combat it, and improve students' digital resilience through innovative resources.[12] Through an interactive, inclusive process that uses evidence-based practices, the project aspires to develop and evaluate high-quality material for school communities to deal with the phenomenon of cyberbullying via their daily practices within and beyond the school walls. This will help support educators and students, building their self-esteem, problem solving and digital skills, as these will make students capable of reacting to different instances appropriately and with more confidence. In a transnational report the current state of cyberbullying was researched in six countries (Poland, Italy, Cyprus, France, Greece and Ireland).[13] The research has shown that there is a consensus on the prevalence and multifaceted nature of cyberbullying among primary and secondary students. Recommendations include enhancing staff training on cyberbullying policies and procedures, providing ongoing education on technological advancements, and fostering a support environment for victims to come forward and seek assistance.

3. Online counselling platform in Greece

Live Without Bullying is an initiative of KMOP based on an online counselling platform and mobile application. It enables young people and adults to chat directly with trained and experienced

---

[9] COFACE Families Europe, School bullying management- Effective skills for educators.
[10] More information about the project and its outputs: Child Sexual Abuse Prevention and Education.
[11] KMOP, Research Report: Stances and Behaviours of Children in Online Environments, 2025.
[12] More information about the project and its outputs: About the project | Safe Online.
[13] Safe Online, WP2: Transnational Report, 2024.

psychologists for assistance with incidents of school and cyberbullying.[14] Counselling is free of charge, anonymous and confidential, and is based on a person-centred cognitive behavioural approach. Since 2015, Live Without Bullying has supported over 30,000 people. The programme is supported by the Greek Ministry of Education.

4. Awareness-raising campaigns on sexism in videogames in Spain

COFACE member UNAF Spain initiated the campaign "Choose Your Role, Act or Not?" ("Elige Tu Rol, Actúas O No?") aimed at raising awareness among families about the significance of guiding children in the use of video games to prevent the adoption of sexist stereotypes and behaviours.[15] UNAF launched the campaign to urge parents to pay attention to sexist stereotypes in certain video games. The campaign provides general recommendations and key considerations for parents, emphasising the importance of reviewing recommended age ratings and content labels (PEGI codes), discussing game content with children, observing their reactions, and promoting family gaming. Through three game-styled videos, UNAF highlights common stereotypes associated with male and female characters, aiming to raise awareness and prevent children from learning and reproducing these stereotypes. UNAF launched a second campaign targeted at adolescent boys, again raising awareness about sexism in video games with the aim to prevent discrimination and violence against female gamers with macho comments and behaviour.[16]

5. Website with online safety tips for families in France

To support and guide families in their digital practices COFACE member UNAF France has created the "Mon enfant et les écrans" ("My child and screens") website, which offers clear and practical information that is regularly updated.[17] With practical advice, easy-to-implement tips, expert opinions and decoded digital news, "My child and screens" helps parents to take back control and to find a balance within their families around the use of screens. The advice is broken down by topic and helps parents to get the most out of screens while protecting their child from the worst. The different topics are families, health, instructions for use and risks. Under the "Families" section of the website, advice is given on which place screens can have within the family. The "Health" section looks at the impact of screens on children's health and well-being. Under "Instructions for use" parents can find information about new social media and trends. Finally, the "Risks" section informs parents about how to prevent or respond to certain challenges. Among other things, it includes tips for parents on how to protect their child from cyberbullying, as well as tips for parents whose children might be the ones that bully.

---

[14] More information about the initiative: Live Without Bullying - Ζήσε χωρίς εκφοβισμό.
[15] More about the campaign: "Choose Your Role"- UNAF Spain launches campaign to combat sexist stereotypes in video games | COFACE Families Europe.
[16] More about the campaign: "Mute your machismo" - A campaign against sexism in video games aimed at teenagers | COFACE Families Europe.
[17] More information about the initiative: Qui sommes-nous ? - mon-enfant-et-les-ecrans.fr.

Annex

Joint Statement: Children's rights at the heart of the upcoming Action Plan against Cyberbullying

September 2025

Introduction

In recent years, the European Union has made significant efforts to protect and promote children's rights online. These include implementing the Better Internet for Kids Strategy and recently adopting the Guidelines on the protection of minors under the Digital Services Act. However, online risks persist, and a robust, holistic and child-centered approach is needed to tackle them. OECD research has shown that the number of adolescents exposed to cyberbullying is increasing, with one in six 11- to 15-year-olds reporting experiences of cyberbullying in 2021–22.[1]

Cyberbullying can take many forms, such as insults, spreading rumours, posting offensive and humiliating photos and videos, and is often more vicious because offenders can hide behind digital identities. Cyberbullying can have short- and long-term mental and physical consequences for children. These consequences can include higher levels of depression and anxiety, emotional distress, suicidal ideation and attempts, and somatic complaints, as well as poorer physical health. It has been shown that these consequences not just happen in front of the screen but have a greater impact on a child's life and well-being.[2] The effects of cyberbullying often extend far beyond the screen. For many children, the emotional toll is long-

---

[1] OECD, How's Life for Children in the Digital Age?, 2025.

[2] See for example: Save the Children Romania, The impact of cyberbullying on children's emotional wellbeing, 2025.

lasting and can contribute to social isolation, academic decline, and an increased risk of grooming, exploitation, and disappearance.[3] Children experiencing such harm need to be listened to, believed, and supported with compassion and care.

The upcoming EU Action Plan against Cyberbullying is an important next step in the ongoing commitment of the European Union to uphold children's rights in the online environment by strengthening online protection, amplifying children's voices, and ensuring early, trauma-informed, and coordinated responses to harm. Signatories welcome that the Action Plan will build further on existing initiatives, like the ones mentioned in the call for evidence, and commit to providing a harmonised definition of cyberbullying at EU level. However, it is also important that the Action Plan will align and complement with other EU initiatives, such as the Gender Equality Strategy, the LGBTIQ Equality Strategy, the Strategy for the Rights of Persons with Disabilities, the Strategy on the Rights of the Child, the Victims' Rights Strategy, as well as the European Pillar of Social Rights which focuses on quality and inclusive education.

Key recommendations

Signatories welcome the approach by the European Commission, and further recommend the following:

1. **Strong prevention by empowering the whole community surrounding the child**

   - The promotion of **digital literacy** as well as **social and emotional skills** from an early age and adapted to the different stages of the life of children is a fundamental prevention mechanism of (cyber-)bullying. Additionally, training and awareness-raising campaigns should be available for **parents, caregivers and frontline professionals** (including teachers, social workers, health staff and police) to recognise the first signs of cyberbullying. Through targeted training, these adults and peers can better **recognise early warning signs**, respond with **sensitivity**, and provide **safe spaces** for children to disclose what they are experiencing.
   - The **links between offline and online bullying** should be considered to ensure effective early detection and prompt support, paying special attention to the educational and family environments of the child.
   - **Civil society organisations** must be supported and adequately funded for their role in connecting children, families, schools and institutions in prevention efforts. The role of **helplines and hotlines** should be further promoted and strengthened, and their operation should be enhanced to ensure accessible, safe, and confidential avenues for children to seek help.
   - **Public authorities in the education and social fields** should provide clear guidelines to education institutions (formal and non-formal) on setting up plans to address and prevent bullying, and how to work in partnership with community and (mental) health organisations.
   - **Online platforms**, including gaming platforms, should invest and ensure specific safeguards to protect children from cyberbullying, including age-appropriate safety features, especially

---

[3] Missing Children Europe, CESAGRAM Project, 2024.

reporting tools, keyword blocking and content moderation technology. Special attention should be paid to how **emerging technologies** may facilitate cyberbullying, especially Artificial Intelligence and Virtual/Augmented Reality, which should be designed with child safety and privacy by default.

2. **Adequate and age-appropriate reporting and redress mechanisms**

   - Children must have **quick, simple, anonymous and accessible ways to report cyberbullying**. Online platforms must ensure that their reporting tools are accessible, especially for children with disabilities, and age-appropriate. Victims should receive **feedback** on the outcome of their report and platforms should ensure the **prompt removal** of harmful content and conduct. A Code of Conduct for online platforms on how to implement measures to prevent and respond to cyberbullying should be considered.
   - **Civil society organisations** often receive the first disclosures from victims. Their capacity to act swiftly and without barriers is essential and must be **adequately resourced**.
   - **Member States** should be encouraged to promote a culture of reporting and **positive bystander behaviours** in schools, educational systems, and sports and cultural associations.
   - **Member States** should be encouraged to **gather disaggregated data on cyberbullying** by age, gender, sexual orientation, disability, and ethnicity to understand who is most affected and target prevention and support measures accordingly. The data collection should also look at how these factors can overlap and create additional vulnerabilities. Evidence-based policymaking depends on understanding the **lived experiences of the most affected groups**.

3. **Access to inclusive, trauma-informed and age-appropriate victim support services**

   - Access to **inclusive, age-appropriate, trauma-informed, user-friendly, free, confidential, sustained support services** should be available to all victims of cyberbullying. Children affected by cyberbullying, including those in residential care, require sustained support to reduce the risk of re-victimisation and further harm. This is why European and national helplines and hotlines must be recognised and securely funded to guarantee child-centred support.
   - Victim support must be coordinated across **health, education, justice, and social services**, and it must take into account the needs not only of the victims but, where relevant, the young perpetrators - many of whom may also be vulnerable or victims of abuse themselves. These multidisciplinary and interagency interventions should be in line with the **Barnahus model** and prioritise the best interests of the child in every response.
   - As cyberbullying crosses borders, the Action Plan must enable **cross-border victim support**, mutual recognition of protection measures and structured EU cooperation to ensure consistent, high-quality services.

Children are experts in their own lives and powerful agents of change. The meaningful and inclusive participation of children will contribute to the success of this Action Plan. Signatories therefore welcome the opportunity for children to share their insights, experiences and ideas via the EU Children's Participation Platform's online survey[4], and call for the continuous participation of children throughout the development, implementation and evaluation of the Action Plan. Policies that affect children's lives must be created **with them, not just for them**. This participatory approach is a cornerstone of **child rights-based policymaking**.

The Action Plan should action Member States, enable civil society organisations and urge online platforms to proactively protect children from cyberbullying. As organisations representing children and working on children's rights, the signatories are ready to play an active role in the further development and implementation of the Action Plan.

This statement has been endorsed by the following individual organisations:

1. 5Rights
2. Alliance for Childhood
3. ChildFund Alliance
4. Children of Prisoners Europe (COPE)
5. Child Rights International Network (CRIN)
6. COFACE Families Europe
7. ECPAT International
8. Educo
9. Eurochild
10. Hope and Homes for Children
11. IGLYO
12. Make Mothers Matter
13. Missing Children Europe
14. Save the Children
15. Victim Support Europe

---

[4] EU Children's Participation Platform, Child-friendly survey Action Plan against cyberbullying, 2025.