

TOWARDS
DIGITAL SAFETY
AND WELL-BEING

**FOR CHILDREN
AND THEIR FAMILIES**

**Moving beyond social media age
restrictions as the sole solution**



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RATHER THAN BLANKET SOCIAL MEDIA AGE RESTRICTIONS, IT IS TIME FOR A PARADIGM SHIFT.

Families are doing their best for their children, but they cannot be alone to ensure a balance of participation, protection and empowerment online. Tech companies need to ensure that their technology is designed in an age-appropriate manner, incorporating sufficient safeguards, and that they respect human rights, including children's rights. Regulators must set clear rules, ensure they are fully enforced and hold tech companies to account.

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1- INTRODUCTION

The impact of screens, smartphones and social media on people's well-being, particularly that of children, is a widely debated topic at this moment. Despite the growing body of evidence on the impact of screen and social media use on children, some knowledge gaps remain, including those relating to causal mechanisms, differential vulnerability, platform-specific effects and long-term developmental consequences.¹ Nevertheless, it is clear that children are increasingly being exposed to risks online.² In her 2025 State of the Union speech, President von der Leyen, stated that "parents, not algorithms, should be raising our children" and that "in all of this work we will be guided by the need to empower parents and build a safer Europe for our children. Because when it comes to our kids' safety online, Europe believes in parents, not profits." COFACE Families Europe welcomes the increasing recognition of the importance of protecting and respecting children's rights in the digital environment, and the commitment to support families in ensuring their children have safe online experiences.


As stated in our COFACE Digitalisation Principles, the roles and responsibilities of different actors should be reconciled and balanced.³ Parents, caregivers and other family members play a key role in supporting their children's online experiences. They often feel a strong sense of responsibility for doing so. However, all families are different. Many parents and caregivers have limited time and resources, and need to balance work and care responsibilities, meaning they can only do so much. Technology companies and governments have a key responsibility to reduce children's exposure to online risks without compromising their opportunities to benefit from digital technologies. They should allocate sufficient resources to this end. Families should be given adequate support and guidance to help their children access and navigate the digital environment safely and meaningfully.⁴

1 A. Sala, L. Porcaro and E. Gómez, Social Media Use and adolescents' mental health and well-being: An umbrella review, *Computers in Human Behavior Reports*, Volume 14, 2024, <https://doi.org/10.1016/j.chbr>, p.11 & 13; Belgian Superior Health Council, The effects of use of screens and social media on young people, <https://www.hgr-css.be/en/report/9877/the-effects-of-use-of-screens-and-social-media-on-young-people>, 2025, p.82; Belgian Superior Health Council, p.82.

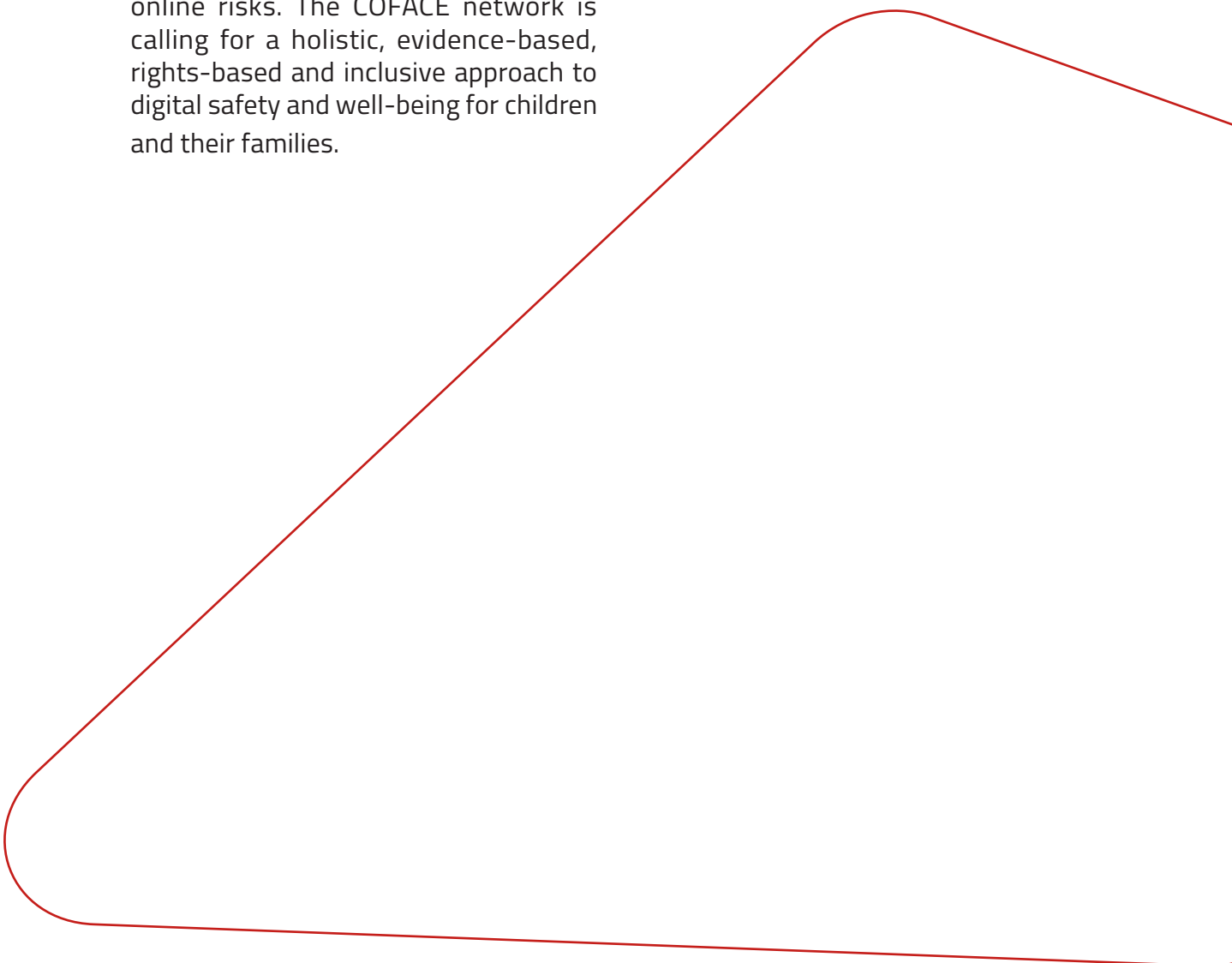
2 NSPCC, Online risks to children: evidence review, 2023, <https://learning.nspcc.org.uk/research-resources/2023/Online-risks-to-children-evidence-review>.

3 COFACE Families Europe, Position Paper: Digitalisation Principles, 2025, <https://coface-eu.org/coface-families-europe-adopts-digitalisation-principles-for-creating-a-better-internet-and-web-for-all/>.

4 COFACE Families Europe, Policy Brief: Supporting Families in the Digital Era: How to ensure safe and enriching online experiences for children and their families?, 2024, <https://coface-eu.org/supporting-families-in-the-digital-era-how-to-ensure-safe-and-enriching-online-experiences-for-children-and-their-families/>.



COFACE Families Europe brings together the perspectives from 50+ family organisations from across Europe, representing millions of families, caregivers, volunteers, and professionals. COFACE uses a pluralistic and multigenerational approach which is based on the interrelated well-being of children and their families.⁵ This position paper aims to contribute to the current discussion on introducing and enforcing age restrictions for children and young people accessing social media, as a means of better protecting them from online risks. The COFACE network is calling for a holistic, evidence-based, rights-based and inclusive approach to digital safety and well-being for children and their families.



⁵ This whole family approach is developed in the COFACE Child Compass 2030, which describes five priority and interrelated areas that affect the health and well-being of the individual child and their family: education, community, digital technology, economy and environment. See: COFACE Families Europe, Child Compass 2030: Shaping a healthy society, environment and economy fit for children, 2020, <https://coface-eu.org/child-compass-2030-shaping-a-healthy-society-environment-and-economy-fit-for-children/>.

2- STATE OF PLAY

Children's digital safety and well-being is currently high on the agenda of the European Union (EU) and its Member States. In the summer of 2025, the European Commission adopted guidelines on the protection of minors under the Digital Services Act (DSA).⁶ The guidelines are adopted under Article 28(1) DSA which states that "providers of online platforms accessible to minors shall put in place appropriate and proportionate measures to ensure a high level of privacy, safety, and security of minors, on their service."⁷ Although they are not legally binding, the guidelines aim to support providers of online platforms in implementing Article 28(1).⁸ The guidelines include a wide range of different measures. Among other things, they state that the Commission considers access restrictions supported by age verification methods to be an appropriate and proportionate measure where Union or national law, in compliance with Union law, prescribes a minimum age for accessing certain products or services offered on any online platform.⁹ The Commission, together with the national digital services coordinators, enforces the DSA and its guidelines. For

example, in February 2026, the European Commission found in its preliminary assessment that TikTok needs to change the basic design of its service, for instance by disabling key addictive features such as 'infinite scroll' over time, implementing effective 'screen time breaks', including during the night, and adapting its recommender system.¹⁰ In addition, the Commission is piloting an age-verification solution which is being tested and further customised in collaboration with Member States, online platforms and end-users. The prototype of the age verification app is currently being piloted in Denmark, Greece, Spain, France and Italy.¹¹

In the meantime, children's access to social media is highly debated in several Member States, with Member States also bringing this to the EU level.¹² As there is no harmonised minimum age to access social media in the EU, France, Greece and Spain have been promoting the idea of a European "digital majority age", meaning the age below which children should not be allowed to access social media platforms.¹³ Multiple other

6 European Commission, Guidelines on measures to ensure a high level of privacy, safety and security for minors online, pursuant to Article 28(4) of Regulation (EU) 2022/2065, https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=OJ:C_202505519.

7 Online platforms that qualify as micro or small enterprises are excluded from this provision (Article 19 Digital Services Act).

8 Article 19 of the Digital Services Act includes an exclusion for providers of online platforms that qualify as micro and small enterprises.

9 European Commission, Guidelines on measures to ensure a high level of privacy, safety and security for minors online, pursuant to Article 28(4) of Regulation (EU) 2022/2065, https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=OJ:C_202505519.

10 European Commission, Press Release: Commission preliminarily finds TikTok's addictive design in breach of the Digital Services Act, 2026, https://ec.europa.eu/commission/presscorner/detail/en/ip_26_312.

11 European Commission, Joint Press Release: Commission presents guidelines and age verification app prototype for a safer online space for children, 2025, https://ec.europa.eu/commission/presscorner/detail/en/ip_25_1820.

12 E. Gkritski, EU clears path for national social media bans, Politico, 2025, <https://www.politico.eu/article/eu-paves-way-to-ban-social-media-for-minors/>.

13 G. Lory, Debate on minors' access to social media networks begins with three EU countries, Euronews, 2025, <https://www.euronews.com/my-europe/2025/06/11/debate-on-minors-access-to-social-media-networks-begins-with-three-eu-countries>.

Member States have expressed their support for the initiative.¹⁴ At national level, France's National Assembly approved a legislation to restrict access for children under 15 from social media and 'social networking functionalities'.¹⁵ Denmark also announced that it would restrict access to social media for children under 15, with an option for parents to give permission to their children to use social media from the age of 13.¹⁶ Instead of adopting age restrictions to access social media through legislation, the Netherlands adopted guidelines to help parents handle screen time and social media apps. Those guidelines state that children under 15 should not have access to social media like TikTok or Instagram, but children over 13 should be able to learn how to use platforms like WhatsApp and Signal.¹⁷ Beyond the EU, Australia has already limited access to social media for children under 16, for which age-restricted social media platforms must take reasonable steps to prevent Australians under 16 from having accounts.¹⁸ Recently, Brazil's children's online safety law came into force. According to the law, accounts for children under 16 must be linked to a parent or guardian.¹⁹ The law includes a wide range of additional measures, including the prohibition of loot boxes in video games directed or likely to be

accessed by children and adolescents.

In November 2025, Members of the European Parliament from the Internal Market and Consumer Protection (IMCO) Committee adopted a report, in which they express concerns over major online platforms' failure to protect minors adequately and warn of the risks relating to addiction, mental health, and exposure to illegal and harmful content.²⁰ Therefore, the Members of the IMCO Committee propose an EU-wide digital minimum age of 16 for access to social media, video sharing platforms and Artificial Intelligence (AI) companions that present risks to minors, unless authorised by parents, and call that no minor under 13 should be able to access social media platforms. Additionally, they call for rules on persuasive technologies and practices like targeted ads, influencer marketing, addictive design, loot boxes and dark patterns, and a default ban on the most harmful engagement mechanisms for minors.

The European Commission is closely monitoring all these developments, and in her 2025 State of the Union speech, President von der Leyen mentioned that she will appoint a panel of experts to advise her on the best approach for Europe.²¹ As mentioned in the Commission's Action

14 Spanish Ministry for Digital Transformation and Public Service, Communication: Nine EU countries support Spain, France and Greece's proposal to protect minors on the Internet, 2025, <https://digital.gob.es/en/comunicacion/notas-prensa/mtdfp/2025/06/2025-06-06>.

15 E. Pineau, France's National Assembly approves banning under-15s from social media, Reuters, 2026, <https://www.reuters.com/sustainability/society-equity/frances-national-assembly-debates-banning-under-15s-social-media-2026-01-26/>.

16 M. Bryant, Denmark plans social media ban for under-15s as PM warns phones 'stealing childhood', The Guardian, 2025, <https://www.theguardian.com/world/2025/oct/07/danish-pm-plans-to-ban-social-media-for-under-15s-warning-it-is-stealing-childhood>.


17 E. Gkritsi, Dutch government says children should not have access to TikTok, Instagram before 15, Politico, 2025, <https://www.politico.eu/article/dutch-government-says-children-should-not-have-access-to-tiktok-instagram-snapchat-before-15/>. Further overview of countries taking initiatives to restrict children's social media access: [From Australia to Europe, countries move to curb children's social media access | Reuters](#).

18 Parliament of Australia, Online Safety Amendment (Social Media Minimum Age) Bill, 2024, https://www.aph.gov.au/Parliamentary_Business/Bills_Legislation/Bills_Search_Results/Result?bld=r7284.

19 Digital Statute of the Child and Adolescent, Brazil, 2025, <https://www.gov.br/mdh/pt-br/assuntos/noticias/2025/novembro/brasil-apresenta-avancos-em-seguranca-digital-da-infancia-e-lanca-eca-digital-em-ingles-durante-cupula-social-do-g20-na-africa-do-sul/eca-digital-ing-v2.pdf>; R. Jahangir, J. Hendrix, Tracking Efforts To Restrict Or Ban Teens from Social Media Across the Globe, Tech Policy Press, 2026, <https://www.techpolicy.press/tracking-efforts-to-restrict-or-ban-teens-from-social-media-across-the-globe/>.

20 European Parliament, Press Release: New EU measures needed to make online services safer for minors, 2025, <https://www.europarl.europa.eu/news/en/press-room/20251013IPR30892/new-eu-measures-needed-to-make-online-services-safer-for-minors>.

21 COFACE Families Europe has been appointed to join the panel in order to bring the voice of European families. COFACE Families Europe, Article: State of the European Union 2025: President von der Leyen is listening to parents, 2025, <https://coface-eu.org/state-of-the-european-union-2025-president-von-der-leven-is-listening-to-parents>.



Plan against Cyberbullying, the expert panel will pave the way to a coordinated, potentially legislative European approach to age thresholds and an evidence-based awareness-raising campaign, empowering parents to take effective control of their children's access to online content. The recommendations from this panel are expected by the summer of 2026.²² Furthermore, the Commission is planning to conduct an EU-wide inquiry on the impact of social media on mental health.

²² European Commission, Action Plan against Cyberbullying, 2026, <https://digital-strategy.ec.europa.eu/en/library/action-plan-against-cyberbullying>.

3- FAMILIES' CONCERNS REGARDING CHILDREN'S DIGITAL SAFETY AND WELL-BEING

Digital technologies, including social media platforms, can have both a positive or negative impact on children.²³ This was also demonstrated by a recent report from the Organisation for Economic Co-operation and Development (OECD).²⁴ It states that digital technologies, in particular social media, offer children opportunities to stay in contact with friends and families and to establish new social connections. Additionally, social media is a way for children to share ideas, seek advice and social support, reduce loneliness and help develop self-identity.²⁵ Nevertheless, digital technologies raise concerns about their harmful impact on children's well-being.²⁶ These concerns include cyberbullying, online child sexual abuse and the negative impact on sleep and mental health. Families often feel unsure about how to strike the right balance between dealing with the negative consequences and allowing their children to take advantage of the opportunities offered by digital technologies without exposing them to risk. Families have also expressed that they have lost trust in online platforms creating a safe environment for their children. Tech companies only have one incentive, namely, to engage as many people as possible for as long as

possible, particularly through the use of addictive algorithms. This business model, coupled with the specific design choices of platforms, is the main source of many of the risks children face online. If platform providers adapted this business model, respected human rights and implemented a safety-by-design approach, children would already be able to navigate a safer and more inclusive online environment.

Three years after the adoption of the European strategy for a Better Internet for Kids (BIK+), the first comprehensive evaluation of the strategy has been published, offering a landmark moment in understanding how Europe is progressing toward a safer, more empowering and inclusive digital environment for children and young people.²⁷ Members of the COFACE Families Europe network from 8 countries (Austria, Bulgaria, Finland, Greece, Hungary, Poland, Slovenia, Spain) organised consultations with parents and caregivers to discuss the Strategy and its three pillars: safe digital experiences, digital empowerment and active participation.²⁸ Among other things, parents shared that they felt overwhelmed and are 'constantly playing catch-up' with the latest technological

23 I. Seland (Ed.), Understanding children and young people as digital citizens (DigiGen- working paper series No.12), 2022, doi: 10.5281/zenodo.7381230.

24 OECD, How's Life for Children in the Digital Age, 2025, https://www.oecd.org/en/publications/how-s-life-for-children-in-the-digital-age_0854b900-en.html.

25 Ibid.

26 See also: OECD, Children in the digital environment – Revised typology of risks, 2021, https://www.oecd.org/en/publications/children-in-the-digital-environment_9b8f222e-en.html.

27 Better Internet for Kids, First evaluation of the BIK+ strategy released: children's voices and expert insights shaping Europe's digital future, 2025, <https://better-internet-for-kids.europa.eu/en/news/first-evaluation-bik-strategy-released-childrens-voices-and-expert-insights-shaping-europes>.

28 COFACE Families Europe, Article: COFACE families contribute to evaluation of Better Internet for Kids + strategy, 2025, <https://coface-eu.org/coface-families-contribute-to-evaluation-of-better-internet-for-kids-strategy/>.

developments. The most significant risks mentioned by parents are the exposure to inappropriate and harmful content online, the amount of time children spend online, the addictive design of technology and content, the commercial exploitation of children through influencer content, and mis- and disinformation. The consultations further showed that awareness on how to support children when encountering harmful or illegal content was limited and that therefore the only solution to avoid this content would be to stay offline. Regarding available tools and resources from platforms, parents stated that parental control tools might be effective for younger children, but less useful for teenagers as they could more easily bypass such measures. In any case, these tools must be age-appropriate, proportionate and privacy-preserving, and should never be used as a standalone measure.

Surveys with parents and caregivers have been showing their growing concerns around their children's social media use and online safety. A survey among parents in Belgium, for example, showed that 4 out of 10 parents are not aware of which apps their children are using, 84% finds it important to invest in media literacy and online safety, and 76% answered that they want social media companies to better protect their children online.²⁹ A study in France showed that 54% of the parents finds managing children's screen time complicated.³⁰ A

study based on speaking with almost 10.000 parents across the US, UK, France, Poland and the Netherlands found that nine in ten parents across countries are concerned about children's online safety and most parents think that politicians and tech companies are not taking children's online safety seriously enough.³¹ In Europe, more than three in five parents hold this view for both politicians and tech companies. The study shows that parents feel a strong sense of responsibility for keeping their children safe online, but they also have high expectations for other actors such as governments and social media companies.

The digital environment is evolving quickly and becoming more complex, especially with technologies like virtual reality and AI becoming more present. For example, research has shown that the number of deep nude applications and images has increased significantly in recent years, as has the use of these applications.³² These AI applications are often used for harmful purposes, such as bullying and the creation of child sexual abuse imagery.³³

However, legislation addressing these issues remains inadequate, while in the meantime existing protections risk to be weakened.³⁴ Given the absence of legislation and/or the enforcement of existing legislation, coupled with the evidence highlighting the various risks children face online, it is entirely

29 The survey was conducted with more than 1.000 Flemish families with children aged between 0 and 18 living at home. Gezinsbond, Gezinsbarometer: Hoe gaat het met onze gezinnen?, 2025, <https://www.gezinsbond.be/gezinspolitiek/gezinsbarometer-hoe-gaat-het-met-onze-gezinnen>.

30 UNAF, Être parent aujourd'hui – Sens, forces, inspirations et besoins, 2025, <https://www.unaf.fr/ressources/etre-parent-aujourd'hui-sens-forces-inspirations-et-besoins/>.

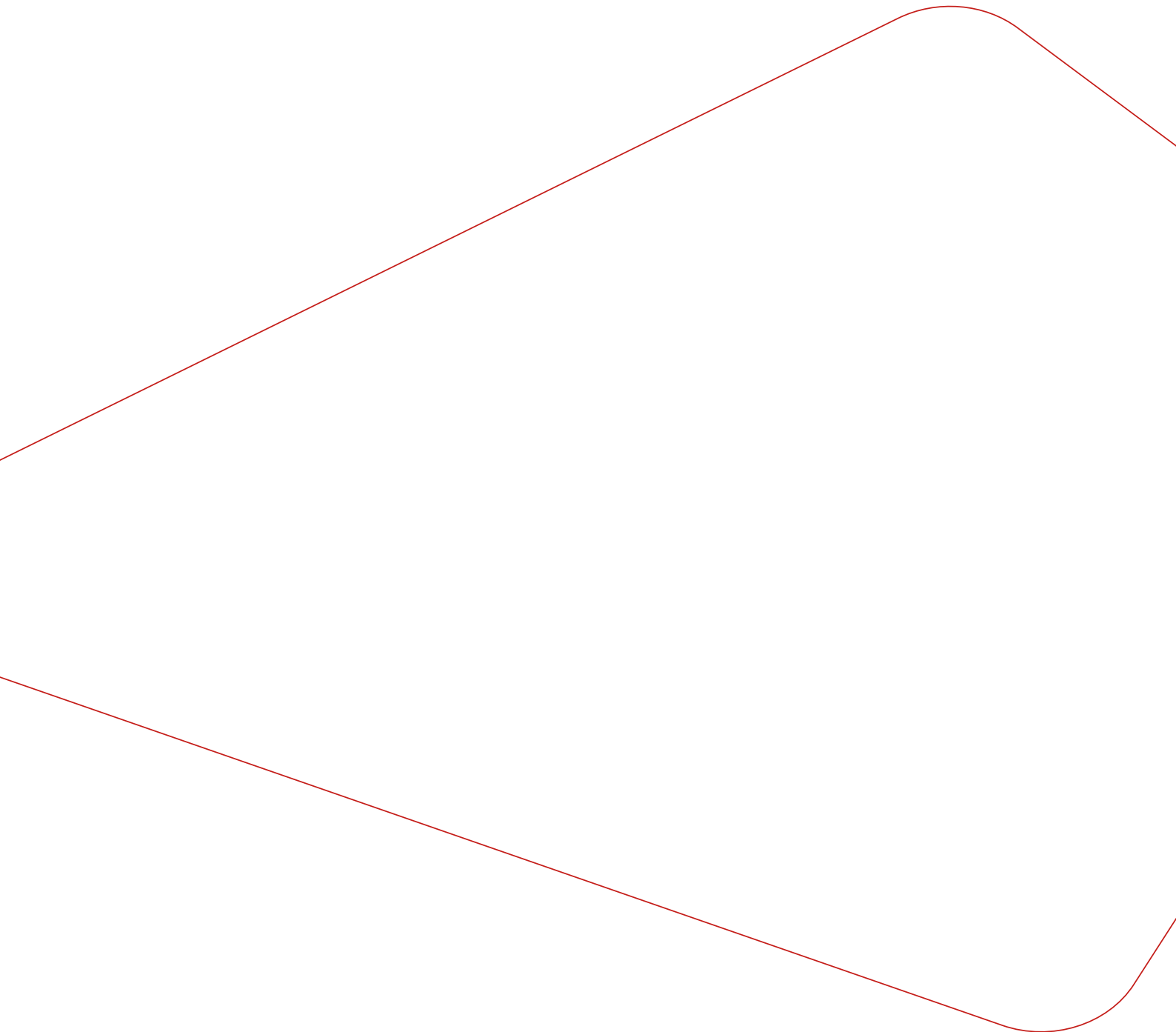
31 More in Common, Parents Talk Online Safety, 2025, <https://www.moreincommon.com/parents-talk-online-safety/>.

32 Belgian Institute for Gender Equality, Universiteit Antwerpen and Child Focus, Deepnudes onder Belgische jongeren, 2023, https://igvm-iefh.belgium.be/sites/default/files/deepnudes_onder_belgische_jongeren.pdf.

33 See for example the recent GrokAI case: European Commission, Press Release: Commission investigates Grok and X's recommender systems under the Digital Services Act, 2026, https://ec.europa.eu/commission/presscorner/detail/en/ip_26_203.

34 Legislation might be coming as both the European Parliament and Council of the European Union included a ban on nudifier systems in their positions regarding the EU's Digital Omnibus on AI (March 2026). COFACE Families Europe, Article: COFACE signs open letters to pass robust legislation to tackle child sexual abuse and to prohibit nudifying tools, 2026, <https://coface-eu.org/coface-signs-open-letters-to-pass-robust-legislation-to-tackle-child-sexual-abuse-and-to-prohibit-nudifying-tools/>; Joint letter on safeguarding children's rights in Digital Omnibus proposals, 2025, <https://5rightsfoundation.com/resource/joint-letter-on-digital-omnibus-proposals/>.

understandable that families are concerned about their children's well-being and are demanding measures to ensure their online safety.



4- CHILDREN'S ACCESS TO THE DIGITAL ENVIRONMENT

The solution currently being proposed by EU Member States and other countries around the world to address these concerns appears to be further restricting children's access to social media.³⁵ Currently, most social media companies set the age from which you can sign up at 13 years old. This 'age of digital consent' comes from the US Children's Online Privacy Protection Act requiring parental consent to process data from children under 13.³⁶ Furthermore, the EU General Data Protection Regulation (GDPR) states that parental consent for the processing of data is needed for children under 16, or 13 in case Member States choose so in their national laws. However, according to research from the London School of Economics (LSE), setting these age limits is not based on evidence about children's development, safety or well-being.³⁷ Additionally, it has been shown that these limits have not been implemented effectively and children younger than 13 are accessing social media.

To properly enforce social media age restrictions, age assurance methods are being proposed.³⁸ In the final DSA guidelines on the protection of minors the Commission "considers measures

restricting access based on age to be an effective means to ensure a high level of privacy, safety and security for minors on online platforms. For this purpose, age assurance tools can help providers to enforce access restrictions for users below a certain age, in order to protect minors from accessing age-inappropriate content online, such as gambling or pornography, or from being exposed to other risks such as grooming."³⁹ Age verification is recommended for adult content platforms, other platforms that pose high risks to the safety of minors, or where risks have been identified but cannot be mitigated by other less intrusive measures as effectively as by access restrictions supported by age verification. The guidelines further specify that age assurance methods should be accurate, reliable, robust, non-intrusive and non-discriminatory.

United Nations Committee on the Rights of the Child (UNCRC) General Comment No. 25 on children's rights in relation to the digital environment states that "the right to non-discrimination requires that States parties ensure that all children have equal and effective access to the digital environment in ways that are meaningful for them."⁴⁰ It furthermore

35 Overview of countries taking initiatives to restrict children's social media access: [From Australia to Europe, countries move to curb children's social media access | Reuters](#).

36 S. Livingstone and K. R. Sylwander, There is no right age! The search for age-appropriate ways to support children's digital lives and rights, *Journal of Children and Media*, 2025, <https://doi.org/10.1080/17482798.2024.2435015>.

37 Ibid.

38 European Commission, News Article: The Commission, Australia's eSafety Commissioner, and UK's Ofcom share insights on age assurance measures, 2026, <https://digital-strategy.ec.europa.eu/en/news/commission-australias-esafety-commissioner-and-uks-ofcom-share-insights-age-assurance-measures>.

39 European Commission, Guidelines on measures to ensure a high level of privacy, safety and security for minors online, pursuant to Article 28(4) of Regulation (EU) 2022/2065, https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=OJ:C_202505519.

40 United Nations Committee on the Rights of the Child, General Comment No. 25 on children's rights in relation to the digital environment, 2021, https://tbinternet.ohchr.org/_layouts/15/treatybodyexternal/Download.aspx?symbolno=CRC/C/GC/25&Lang=en.

states that “the risks and opportunities associated with children’s engagement in the digital environment change depending on their age and stage of development. [States parties] should be guided by those considerations whenever they are designing measures to protect children in, or facilitate their access to, that environment. The design of age-appropriate measures should be informed by the best and most up-to-date research available, from a range of disciplines.” General Comment No. 25 clearly lays down that states are obliged to ensure that businesses meet their responsibilities, including carrying out child rights impact assessments as part of their due diligence.⁴¹

Solely putting age restrictions to access certain online platforms for children can have a negative impact on children’s rights and the opportunities that they might gain from being on those platforms, such as their right to education, play, information, civic participation and personal development, in line with the United Nations Convention on the Rights of the Child. It might also create a false sense of safety and make children go to even less regulated platforms, putting children in even more dangerous situations, as they would try to find other ways to access digital technologies, especially when not receiving the right support and skills to navigate the digital environment.⁴²

The impact (negative or positive) that social media has on children is often not caused solely by social media use but also influenced by other external factors.⁴³ Children are not a

homogeneous group and blanket age restrictions can be socially selective and exclusionary.⁴⁴ When developing policy solutions, it is necessary to take into account the diverse characteristics and the circumstances in which children grow up, as well as their evolving capacities and their rights in their entirety. Furthermore, the focus is often only on the quantity of screen time, rather than the quality of the digital activities that children carry out. The impact of social media use is complex and multifaceted.⁴⁵ It is therefore important to balance the different rights of children, and to ensure that any measures impacting their rights are necessary and proportionate.

⁴¹ See also: UNCRC General comment No. 25 5th Anniversary Joint Letter, 2026, <https://5rightsfoundation.com/resource/uncrc-general-comment-no-25-5th-anniversary-joint-letter/>.

⁴² F. Köhler-Dauner et al., Digital child protection in social networks: age verification and age-tiered regulation in Europe, 2025, <https://doi.org/10.1186/s13034-025-01016-x>, p. 7.

⁴³ A. Sala, L. Porcaro and E. Gómez, Social Media Use and adolescents’ mental health and well-being: An umbrella review, *Computers in Human Behavior Reports*, Volume 14, 2024, <https://doi.org/10.1016/j.chbr.> p.11.

⁴⁴ F. Köhler-Dauner et al., Digital child protection in social networks: age verification and age-tiered regulation in Europe, 2025, <https://doi.org/10.1186/s13034-025-01016-x>, p. 7.

⁴⁵ Ibid; S. Manolios, A. Sala, E. Sundorph et al., Minors’ health and social media: an interdisciplinary scientific perspective, 2025, <https://publications.jrc.ec.europa.eu/repository/handle/JRC141090>.

5- SUPPORTING FAMILIES, BOTH OFFLINE AND ONLINE

COFACE believes that a holistic, evidence-based and inclusive approach grounded in children's rights is needed. This approach should go beyond restricting children's access to the digital environment and should include effective measures to improve online child protection, participation and empowerment.

Parents and caregivers play a key role in supporting their children's digital well-being. They recognise that ensuring their children's online safety is their responsibility and that they must also set a good example by demonstrating appropriate behaviour. Although there are important interventions families can make themselves, they cannot tackle this alone. Policy makers and technology companies must play their part and not leave the burden on children and families. The most important way to support families is to ensure strong protections through legislation, such as the DSA, AI Act, GDPR, Audiovisual Media Services Directive (AVMSD) but also the EU Child Sexual Abuse Regulation (CSAR) proposal (currently being negotiated), and properly enforce those protections by holding tech companies accountable and demanding them to ensure their products and services are safe and respect children's rights. If reform of existing social media platforms seems to be impossible, alternative platforms that prioritise children's rights and human rights overall over profit, should be promoted and invested in.

In addition, integrated child protection systems also play a crucial role in ensuring the safety and well-being of children in digital environments. According to the European Commission's Recommendation on developing and strengthening integrated child protection systems in the best interests of the child, "Member States should promote an interdisciplinary approach to child protection involving all actors in the field of the protection of children, including private actors, public authorities, civil society, family, carers and children themselves, while supporting families as primary carers."⁴⁶ This means that Member States should implement effective and accessible prevention, reporting and protection measures that take the best interests of children into account, in order to protect them from violence in both physical and digital environments. Hotlines and helplines (of which some are also recognised as trusted flaggers under the DSA) play an important role in offering support to children and their families. They must be securely funded to ensure their continued operations.

UNCRC General Comment No. 25 mentions that "parents and caregivers require support to develop the technological understanding, capacity and skills necessary to assist children in relation to the digital environment."⁴⁷ Additionally, it states that particular attention should be given to parents and

⁴⁶ European Commission, Recommendation on developing and strengthening integrated child protection systems in the best interests of the child, 2024, [EUR-Lex - 32024H1238 - EN - EUR-Lex](#).

⁴⁷ United Nations Committee on the Rights of the Child, General Comment No. 25 on children's rights in relation to the digital environment, 2021, https://tbinternet.ohchr.org/_layouts/15/treatybodyexternal/Download.aspx?symbolno=CRC/C/GC/25&Lang=en.

caregivers of children in disadvantaged or vulnerable situations. To ensure children and their families are empowered to access and use digital technologies in a safe and meaningful way, digital competences and skills are essential. This was also shown in a Flash Eurobarometer survey on the future needs in digital education.⁴⁸ There are many examples of parenting support programmes run by non-governmental organisations in Europe (including family organisations and Safer Internet Centres) in partnership with schools and communities in order to build understanding and awareness of parents and caregivers about the threats and opportunities of digital technologies for their children.⁴⁹ Additionally, guidance and resources on online safety should be made available through various family support services, such as early childhood education and care (ECEC) services. There are also public family centres or hubs being rolled out across European countries like Belgium, Bulgaria, Finland, Estonia, Germany, Croatia, the United Kingdom and Italy which provide parental support – these community hubs can be key to reach out to parents and caregivers in order to roll out digital parenting support programmes.⁵⁰ Such good practices in both the public and non-profit sector should be identified, evaluated, and upscaled in EU policy and funding programmes.

Lastly, rather than restricting children's access to the digital environment, we should try to ensure that different environments are designed with them in mind. This should also be true for the physical environment. Many public

spaces, both indoor and outdoor, are not designed with children in mind.⁵¹ Often, the way they are designed excludes certain groups of children or makes them inaccessible.⁵² If we want children to reduce their screentime, they should have access to alternatives and 'offline' possibilities to ensure their rights are being protected and respected.

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- 48 92% agree that digital skills should be taught to everyone at all levels of education: Eurobarometer, Future needs in digital education, 2025, [Future needs in digital education - December 2025 - - Eurobarometer survey](#).
- 49 COFACE Families Europe, Policy Brief: Supporting Families in the Digital Era: How to ensure safe and enriching online experiences for children and their families?, 2024, <https://coface-eu.org/supporting-families-in-the-digital-era-how-to-ensure-safe-and-enriching-online-experiences-for-children-and-their-families/>.
- 50 European Observatory on Family Policy, Report: Towards greater family policy integration across Europe, 2023, <https://coface-eu.org/report-of-the-european-observatory-on-family-policy-towards-greater-family-policy-integration-across-europe/>.
- 51 See for example: S. Blauw, Wil je dat kinderen van hun scherm afkomen? Zorg dat ze iets beters te doen hebben, De Correspondent, 2025, <https://decorrespondent.nl/16023/wil-je-dat-kinderen-van-hun-scherm-afkomen-zorg-dat-ze-iets-beters-te-doen-hebben/965e314e-bb39-0b03-0e33-dc969b3ac34a>.
- 52 Zijkant, Project: Girls Make The City, <https://www.zijkant.be/gelijke-toegang-tot-publieke-ruimte/girls-make-the-city/>.

6- CONCLUSION AND RECOMMENDATIONS

Children are exposed by many online risks and should be better protected in the digital environment. However, the solution must be holistic and consider different family realities, as well as children's rights in the digital environment. Child protection should be organised within the digital environment, not in opposition, and it should also be integrated into pedagogical and social contexts.⁵³ This protection goes hand in hand with the responsibility of tech companies to ensure that their products and services are safe. If they do not respect the rules and children's rights, they should be banned from the market. To ensure that children's rights in the digital environment are realised through both protection and empowerment, digital literacy education plays a key role. Children need access to safe and participatory spaces, both online and offline, where they can learn, play, inform themselves and have fun.⁵⁴

At COFACE Families Europe we will continue following further research and policy developments and contribute to ensuring a safer and more inclusive digital environment for all, and especially for children. We believe that different actors can contribute towards digital safety and well-being for children and therefore have formulated some key recommendations below. First and foremost, there is the responsibility of the technology companies themselves. They know their products and services best, and they

have the necessary resources to ensure safe digital experiences and comply with their due diligence obligations. Furthermore, as stated in UNCRC General Comment No. 25, States must hold businesses accountable to ensure they respect children's rights. Therefore, the recommendations listed below are primarily addressed to technology companies, European institutions, and national governments. Additional recommendations are also directed at schools and families themselves, in order to empower children and their families further.

⁵³ F. Köhler-Dauner et al., Digital child protection in social networks: age verification and age-tiered regulation in Europe, 2025, <https://doi.org/10.1186/s13034-025-01016-x>, p. 9.

⁵⁴ Ibid.

TECHNOLOGY COMPANIES

- Ensure safety, privacy and security by design of all services and products brought on the market, through effective content moderation, more transparency, privacy default settings, and other measures mentioned in the guidelines on the protection of minors under the DSA.
- Develop technology that is responsible, sustainable and ethical. Work alongside end users, including children and young people, and civil society organisations that represent them. Make use of the wide range of tools and resources available to ensure responsible business conduct.
- Conduct child rights impact assessments of digital products, services, tools and functionalities before launching them.⁵⁵ This includes the latest AI-based tools and functionalities, ensuring that potential harm to children is eliminated from those. When implementing a new tool or functionality in an online service, ensure that users are informed and can opt in instead of having to opt out.
- Ensure that information about products and services are easy to understand and accessible for all parents and caregivers, including parents and caregivers with disabilities.

EUROPEAN INSTITUTIONS

- Further implement and enforce the DSA, AI Act, GDPR and AVMSD, and hold technology companies accountable. There is a need for robust legislation and enforcement that cannot be weakened or reversed under the aim of 'simplification'.
- Allocate adequate funding to the implementation and enforcement of abovementioned regulations, but also the implementation of key EU Strategies to protect children's rights in the digital environment, such as the Better Internet for Kids Strategy and the Action Plan against Cyberbullying.
- Adopt further regulation to tackle the harms children are exposed to online, this includes adopting a long-term framework to prevent and detect child sexual abuse material online (CSAR proposal) and a Digital Fairness Act to address dark patterns and addictive design features.
- Ensure that legislations and policies to better protect children in the digital environment are evidence-based, rights-based and inclusive. Conduct child rights impact assessments to consider how those legislations and policies will affect children.⁵⁶

55 UNICEF, Assessing child rights impacts in relation to the digital environment: Implementing the D-CRIA Toolbox, <https://www.unicef.org/childrightsandbusiness/workstreams/responsible-technology/D-CRIA>. x

56 ENOC, Child Rights Impact Assessment, <https://enoc.eu/what-we-do/annual-advocacy-areas/child-rights-impact-assessment/>.

- Fund and/or conduct further research to inform policies in an evidence-based way. Looking at the impact of social media is a complex issue and the diversity of children, as well as pre-existing vulnerabilities and other external factors, should be taken into account.
- Allocate sufficient funding to digital literacy programmes targeting children and their families, as well as awareness raising campaigns. Digital literacy education should take place in formal education settings as part of the curriculum, addressing children and youth directly. But also, through family education, which can take place through leading community NGOs, specialised Safer Internet Centres, public family support services, awareness campaigns, and various online resources. Families need accessible and reliable low-threshold guidance, support and digital literacy resources.
- Promote and strengthen helplines and hotlines (of which some are also trusted flaggers under the DSA) and ensure that they are adequately funded to continue ensuring accessible, safe, and confidential avenues for children to seek help.
- Involve families in policy discussions and listen to their needs. Many parents and caregivers feel lost and do not have the time or resources to be up to date with the latest technological developments.

NATIONAL GOVERNMENTS

- Ensure that legislations and policies to better protect children in the digital environment are evidence-based, rights-based and inclusive. Conduct child rights impact assessments to consider how those legislations and policies will affect children.⁵⁷
- Provide low-threshold guidance and resources for families by ensuring this information is accessible at family support services such as Early Childhood Education and Care (ECEC) services. Roll out family centres and hubs and provide sustainable funding for Safer Internet Centres and family NGOs to work together and maximise outreach, including to harder-to-reach families.
- Include training on online safety into the curriculum of professionals such as teachers, health professionals and social workers.
- Develop and strengthen integrated child protection systems, in line with the European Commission's Recommendation on developing and strengthening integrated child protection systems in the best interests of the child.
- Develop strong policies to prevent and tackle cyberbullying, in line with the new EU Action Plan against Cyberbullying.

⁵⁷ Ibid.

- Invest in 'offline' alternatives for children by ensuring that public indoor and outdoor spaces are safe, attractive, inclusive and accessible for all children and by investing in culture and sport activities.

SCHOOLS

- Have digital literacy as part of the curriculum, rather than one workshop or session. Digital literacy should be taught in an age-appropriate, inclusive and accessible way.
- Develop mental health and bullying prevention programmes which are futureproof and include protocols linked to harm in the digital environment. Bullying often starts in schools and continues beyond school hours. Any school actions to tackle bullying should be holistic and comprehensive, taking into account the full ecosystem that children live in.

FAMILIES

- Have open conversations with children on their digital technology use and create a relationship of trust in order to foster open dialogue. Families can work together as a team, learning together how to harness technologies, as they constantly evolve, and how to address challenging situations. Children should be engaged in creating rules concerning their digital technology use, according to the age and maturity of the child.
- Teach children how to use online platforms safely and how to report something so that they can receive the necessary support. This also means setting a good example for children when using digital devices and demonstrating respectful behaviour on online platforms.



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