BIK Policy Map

Country impact case studies

March 2023

Further information on BIK Policy Map actions and outputs can be found at

www.betterinternetforkids.eu/bikmap

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The Better Internet for Kids Policy Map: Country impact case studies

Please cite this report as:
O'Neill, B., Dreyer, S. and Dinh, T. (2023). *Better Internet for Kids Policy: Country Impact Case Studies*. European Schoolnet. Available at: https://www.betterinternetforkids.eu/bikmap

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1. Introduction

The Better Internet for Kiks Policy Map (BIK Map) country impact case studies presents the output of a series of individual investigations of policy development and implementation in EU Member States. Designed to complement the BIK Policy Map (the fourth edition of which will be published in May 2023), these country case studies provide insights from a national perspective rather than from the point of view of implementing EU strategy. In this way, it is hoped that further dimensions to effective implementation regarding better internet policies can be identified.

The aims of these country impact case studies are as follows:

a) To gain insight into how selected EU Member States establish and implement national policy frameworks and measures in the areas related to Better Internet for Kids (BIK) strategy.

b) To identify promising indicators for the BIK Policy Map tool.

c) To assist in aligning findings from the Member States with the new BIK+ strategy.

d) To add to the stock of practices worth sharing.

Four countries were chosen as subjects for the case studies. Using the collective impact model as an analytical framework,[1] desk research and qualitative interviews were carried out with country experts. Countries were selected on the basis of distinctive relevance to the themes contained within the collective impact approach. As such, the following four country case studies were identified, from the outset, as being of interest to the exercise.

Table 1: Country impact case studies

	Country	Focus area
Case study 1	Ireland	Integrated policy/single integrated legal framework.
Case study 2	Finland	Policy coordination and design. Formal cooperation mechanism between several competent authorities; focus on digital media literacies and education policy.
Case study 3	Malta	Children's participation. Active participation of children during the whole policy cycle.
Case study 4	Germany	Stakeholder involvement. Focus on integrating user-generated content platforms in policy initiatives.

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[1] Kania, J., & Kramer, M. (2011). Collective Impact. Stanford Social Innovation Review, (Winter), 36–41. Retrieved from https://ssir.org/articles/entry/collective_impact

Based on the approach adopted for the project as a whole, the research proceeded as follows:

1. **Policy review:** A desk review was carried out of relevant policy documentation, typically for the five-year period leading up to the current position as regards BIK-related initiatives. Initial information was drawn from the BIK Policy Map surveys. The review served the purpose of identifying the range of topics and policy issues covered with a view to assessing the extent to which a common agenda consistent with the collective impact approach is in place.

2. **Evidence review**: In addition to policy analysis, a brief stocktaking of evidence and data sources was undertaken (for example, using the resources in the CO:RE knowledge base)[2] to identify the indicators most widely used in measuring success in national interventions. This again helped to assess the extent to which a common measurement system, as recommended in the collective impact approach, was available.

3. **Expert interviews – programme activities**: Through expert and stakeholder interviews, an outline of the most relevant stakeholder activities – either directly sponsored by the national policy framework or indirectly linked in terms of contributing to its key objectives – was also undertaken. The aim of this phase of the work was to identify the range of clearly stated activities mapped against objectives of national policy, identifying relevant categories of stakeholders, sectors and patterns of communication as indicated in the collective impact approach.

4. **Expert interviews – public servants/government officials**: Finally, several interviews with relevant government officials and regulators were held, representative of backbone organisations in the sector.

This report distils the main findings of the country case studies by focusing on the following questions:

- **Research question 1:** To what extent do the individual case studies give insights into collective impact at the national level?

- **Research question 2:** What lessons can be learned from the individual profiles regarding indicators of potential interest for the BIK Policy Map?

- **Research question 3:** How do the individual studies of policy development align with the three pillars of the new BIK+ strategy?

The case studies are presented as annexes to this report.

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[2] https://core-evidence.eu/

Better Internet for Kids

2. Contribution to the understanding of collective impact at the national level

The first question addresses the extent to which the individual case studies give insights into collective impact at the national level. The collective impact approach[3] was first introduced as part of the third BIK Policy Map study[4] as an appropriate framework with which to theorise potential indicators and to systematically analyse the comparative results.

Collective impact refers to the combined action of actors from different sectors working to a common agenda to solve a specific and complex social problem, using a structured form of collaboration. The concept is based on the idea that in order to create lasting solutions to social problems on a large scale, actions need to be coordinated and be based around a clearly defined goal, owing a legacy to assumptions and approaches from theories of coalition building.[5]

The collective impact framework set outs five conditions for an initiative to be considered representative of this approach:

- **Common agenda**: All participants have a shared vision for change including a common understanding of the problem and a joint approach to solving it through agreed-upon actions.

- **A shared measurement system**: Agreement on the ways success is measured and reported with key indicators by all participating organisations.

- **Mutually reinforcing activities**: Engagement of a diverse set of stakeholders, typically in multiple sectors, coordinating a set of differentiated activities through a mutually reinforcing plan of action.

- **Continuous communication**: Consistent and open communication is needed across the many players to build trust, assure mutual objectives, and create common motivation.

- **Backbone organisation**: Creating and managing collective impact requires a separate organisation(s) with staff and a set of specific skills to serve as the backbone for the entire initiative and coordinate participating organisations and agencies.

The above five conditions were used as the main interpretative framework in the case studies to assess multistakeholder actions related to better internet for kids policy. For each case study, one specific indicator from the BIK Map was chosen as a distinctive theme, for example a single integrated framework for Ireland or children's participation in policy-making

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[3] Kania, J., & Kramer, M. (2011). Collective Impact. Stanford Social Innovation Review, (Winter), 36–41. Retrieved from https://ssir.org/articles/entry/collective_impact

[4] O'Neill, B., Dreyer, S., & Dinh, T. (2020). The Third Better Internet for Kids Policy Map Implementing the European Strategy for a Better Internet for Children in European Member States. EUN Schoolnet. https://www.betterinternetforkids.eu

[5] Himmelman, A. T., Berkowitz, B. D., Christens, B., Butterfoss, F., Lee, K. S., Minkler, M. et al. (2017). Collaborating for equity and justice: Moving beyond collective impact. Nonprofit Quarterly, https://nonprofitquarterly.org/collaborating-equity-justice-moving-beyond-collective-impact/

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for Malta. However, this was not to the exclusion of the other elements and, in each case, a holistic overview of the current state of policy making was sought.

The following summary distils the main findings regarding collective impact at the national level as illustrated by the case studies.

2.1 Common agenda

Ireland was chosen as the primary example of a country that has developed an integrated approach to policymaking. In the third BIK Policy Map report,[6] there were just two countries that met this criterion: Ireland and Slovenia. The development of a new legislative framework in Ireland, namely, the Online Safety and Media Regulation (OSMR) Act 2022[7] as the overarching primary legislation establishing a regulatory framework for online safety in Ireland, is the most salient aspect in this regard. The OSMR Act establish a single Media Commission, known as Coimisiún na Meán, and an Online Safety Commissioner as the regulatory authority responsible for this field. Coimisiún na Meán has the overall focus on content regulation in both broadcast and in online audiovisual services; it will also act as the Digital Services Coordinator as required under the EU Digital Services Act.[8] The OSMR Act already transposes and gives effect to the Audiovisual Media Services Directive[9] in Ireland.

In the Ireland case study, the background to development of the framework and, specifically, how a common agenda was formulated over the course of several years is discussed. The following are the main highlights of the case study:

Common agenda driven by a long-term process of stakeholder collective action

As the Ireland case study illustrates, building a common agenda can take a long period of time. The development work leading up to the enactment of legislation was many years in the making and experienced many moments in which progress faltered. As such, the notion of a common agenda might be better described as a consensus that involves negotiation, false starts and compromise. Rarely is there a straightforward path to development even if the primary goals are decided long in advance. This is not to say that the notion of a common agenda is not important but that there needs to be recognition of the sometimes-long path to reach the point of consensus. Similarly, the common agenda is rarely univocal and, through its formation, may bring together quite disparate elements sometimes in tension with one another.

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[6] O'Neill, B., Dreyer, S., & Dinh, T. (2020). *The Third Better Internet for Kids Policy Map Implementing the European Strategy for a Better Internet for Children in European Member States*. EUN Schoolnet. https://www.betterinternetforkids.eu/bikmap

[7] https://www.oireachtas.ie/en/bills/bill/2022/6/

[8] Regulation (EU) 2022/2065 of the European Parliament and of the Council of 19 October 2022 on a Single Market For Digital Services and amending Directive 2000/31/EC (Digital Services Act), 277 OJ L (2022). http://data.europa.eu/eli/reg/2022/2065/oj/eng

[9] Directive 2010/13/EU of the European Parliament and of the Council of 10 March 2010 on the coordination of certain provisions laid down by law, regulation or administrative action in Member States concerning the provision of audiovisual media services (Audiovisual Media Services Directive) (Codified version), CONSIL, EP, 095 OJ L (2010). http://data.europa.eu/eli/dir/2010/13/oj/eng

This is supported by insights from the other case studies as well. In Finland, media literacy was a prominent theme of discussion dating back to the 1980s and earlier. In Malta, the discussion of children's rights and participation issues also dates back to the period of EU accession as well as to the ratification of the UN Convention on the Rights of the Child (UNCRC). In Germany, likewise, current discussions of the reform of the Youth Protection Act build on many years of debate and working with actors involved in the youth media protection system.

External drivers are important

The Ireland case study noted that there were several distinctive factors that influenced the evolution of the approach adopted and that without external drivers, it would have been unlikely that such a high-profile piece of legislation would have been considered. One such factor is the presence of a substantial technology sector in Ireland, with many companies locating international and European headquarters there. As such, Ireland has assumed an important responsibility as the lead supervisory data protection authority for companies that have hosted their activities in Ireland. Similarly, under the Audiovisual Media Services Directive, Ireland takes on a leading supervisory role in the regulation of video-sharing platforms located in the country. Thus, this factor of major global presence has driven the need for a robust government response in establishing effective regulatory conditions.

EU legislation also acts as a strong external driver in this regard. Both the GDPR and AVMSD have had a disproportionate impact on Ireland given its relative size and have helped drive the common agenda that would otherwise have taken a long time to form.

It might be said, therefore, that contrary to the collective impact approach, despite the efforts of all stakeholders to develop and agree on a common agenda, without some strong external driver acting as a motivation, achievement of consensus and a common output may be difficult. Multistakeholder collective activity as such may not be a sufficient condition on its own and does not always lead to a successful outcome.

Civil society representation is key

For each of the five conditions of collective impact, the involvement of different stakeholders is identified as an important factor. In the case of the development of a common agenda, this is particularly so as illustrated by Ireland. Civil society in this instance refers not just to a community of citizens linked by common interests and collective activity, but a distinct grouping separate from business and the state. In the Ireland case study, civil society was represented by formal groups such as the Children's Rights Alliance[10], an alliance of over 180 separate organisations bringing together diverse NGOs and non-state actors. The formulation and agreement around the common agenda as such require representation of diverse groups in quasi-formal settings so that deliberative discussions have structure and organisation. As such, the availability and participation of representative organisations is an important factor to assess in processes looking to build a common agenda.

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[10] https://www.childrensrights.ie

2.2 A shared measurement system

The availability of shared measurement systems was reviewed in each of the case studies. Agreement on the ways in which success is measured and reported on by all participating organisations is regarded as one of the conditions needed to underpin collective impact. However, as many studies and reports have shown, children's participation in the digital environment suffers from historical neglect of sufficient research evidence or statistics. For this reason, initiatives such as EU Kids Online[11] or the CO:RE knowledge platform[12] were established with support from the European Commission.

Factors influencing the availability of a measurement system

In the case studies which examine the background to BIK-related policymaking, only in Germany can it be said that there is a regular system of shared measurement in the form of national quantitative surveys. Data collection was uneven in each of the other countries – Ireland, Malta and Finland – with irregular timeframes and a lack of comparability between different studies. In the case of Germany, several regularly conducted surveys regarding BIK-related issues take place, with additional relevant studies being published on an irregular basis. However, there is no research accompanying the newly initiated dialogic process specifically. The need for formal evaluation of processes such as Germany's BzKJ (Bundeszentrale für Kinder- und Jugendmedienschutz, Federal Agency for the Protection of Children and Young Persons in the Media) is formally embedded within the legal framework. However, no indicators have been agreed on yet.

Two factors appear to influence the availability of shared measurement systems. One obvious factor is size. Germany, as the only large country represented among the case studies, has "JIM" annually as a basic study on the media use of 12 to 19-year-olds and Jugendmedienschutz-Index: The Youth Media Protection Index (2018, 2023) as regular national studies. Smaller countries have struggled to maintain the same level of regularity in national data collection. The other factor of interest is the role of state agencies which uniquely have the authority to put in place regular measurement systems. Thus KAVI, Finland's National Audiovisual Institute, is well positioned to commission and coordinate such research even if the specific area of media literacy lacks a robust evidence base to date.

2.3 Mutually reinforcing activities

The collective impact model envisages the engagement of a diverse set of stakeholders, typically in multiple sectors, coordinating a set of differentiated activities through a mutually reinforcing plan of action as an important condition for the overall endeavour.

Joint activities are a feature of many of the initiatives reviewed in the case studies.

In Germany, the BzKJ is responsible for developing and nurturing a strategy process for children's safety online, including all relevant stakeholders. Since 2019, it has conducted a

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[11] http://eukidsonline.net/
[12] https://core-evidence.eu/

series of evidence-based and open-ended future workshops with all relevant stakeholders to jointly realise children's rights to protection, empowerment and participation with regard to digital media use. Similarly, in Ireland, consultation and stakeholder engagement were critical to the development of the legislation establishing a new framework for online safety. This included parliamentary hearings, a multistakeholder forum, consultations on drafts and open submissions to the process.

The critical role of Safer Internet Centres

A notable feature of the many activities under this theme is the important role played by Safer Internet Centres (SICs) in the coordination of better internet activities. In contrast to the collective impact model, which may suggest a relatively unitary approach whereby a single alliance sponsors and participates in a common set of activities, better internet activities are often highly differentiated, sponsored by diverse organisations, and lacking in the degree of coordination that the collective impact model might imply. What makes the difference in bringing many of these activities together are Safer Internet Centres which are mandated to coordinate awareness-raising activities and to bring consortia together for the attainment of common goals. This is best illustrated by programmes associated with Safer Internet Day (SID), which coalesce around an agreed theme and are centrally coordinated for the purpose of achieving maximum impact. This also serves to build support for a common agenda and consensus among partners.

This is illustrated in each of the case studies where the SIC stands out as lending support to coordination. In the case of Finland, for example, KAVI has a key role to play in brokering and facilitating discussions between different agencies. In Malta, the SIC also acts as the focal point for the discussion of better internet policies and represents Malta in the European-level Expert Group for Safer Internet. Advisory bodies to the SICs are also key representative fora for different stakeholder groups and, in the absence of other equivalent platforms, provide a vital opportunity for national-level interests to be debated.

Safer Internet Centres working in tandem with public agencies and ministries

A point of note for the purposes of the BIK Policy Map is that, in many instances, government departments or ministries have an active role to play in the Safer Internet Centre. This is in addition to the sponsoring role that all SICs require in having a lead ministry which acts as the signatory for EU funding purposes. In the examples highlighted in the case studies (Malta, Finland), government departments or state agencies (Ireland) have close involvement in supporting the SIC and carrying out its programme. In this way, SICs act as quasi-public agencies and lead in implementing public policy objectives.

2.4 Continuous communication

As the collective impact approach outlines, consistent and open communication is needed across the many players to build trust, assure mutual objectives, and create common motivation.

As evidenced by the German case study, continuous communication is essential to building trust among the many stakeholders involved in reforming the Youth Protection Act (JuSchG).

Communication in respect of the development of the new legal framework has been extensive, including consultations and hearings for two iterations of the JuSchG. The BzKJ has also continued its project "ZUKUNFTSWERKSTATT", which aims to establish a central discourse space for further developing children's rights-based online safety policies.

In Malta, the development of the National Youth Policy has been characterised by extensive consultation with all stakeholders, resulting in the establishment of the National Youth Agency of Malta, *Aġenzija Żgħażagħ*,[13] for the purposes of policy coordination and implementation. The agency has pioneered the use of e-participation methods using the OPIN platform to continue engaging youth in policy deliberation, particularly regarding the new youth policy under development.

In Finland also, continuous communication as illustrated by KAVI's public outreach activities has been an important contributor to raising the profile of the topic of media literacy. This is supported also by the multistakeholder body, the Finnish Society on Media Education which has also had a very important influence on the development of the national profile for this topic. In addition, Finland has engaged in extensive international partnerships and collaborations which have similarly contributed to its reputation as a leading international centre of excellence in media literacy and media education.

Political communication regarding BIK-related matters is noteworthy

Communication at the political level has been a feature of the case studies under review. Better internet or BIK-related policies are often close to the political domain. In Ireland and Germany, commitments to strengthening government action in relation to the protection of children online featured in the programmatic documents of incoming governments and gave rise to legislative processes. Malta's Prime Minister made engaging with youth voices a key part of government policy, culminating in the historic decision in 2018 to extend the vote in national elections to young people, aged 16 and over. In Finland, media literacy has been a notable concept in the fight against disinformation and improving civic resilience against political propaganda and misinformation.

2.5 Backbone organisations

A finding that underpins nearly all other conditions within the collective impact approach is the need for strong central support in the form of a backbone organisation. According to the model, creating and managing collective impact "*requires a separate organisation(s) with staff and a specific set of skills to serve as the backbone for the entire initiative and coordinate participating organisations and agencies*".[14] The need for a central organising agency or entity has also been noted in successive BIK Policy Map reports and hence the inclusion of indicators regarding coordinating bodies or agencies.

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[13] https://youth.gov.mt/
[14] Kania, J., & Kramer, M. (2011). Collective Impact. Stanford Social Innovation Review, (Winter), 36–41. Retrieved from https://ssir.org/articles/entry/collective_impact

The importance of statutory bodies

In the four case studies, the role of several organisations was noteworthy. Finland's National Audiovisual Institute (KAVI) alone has a statutory duty to promote media literacy, the strongest signal possible of its public policy importance. Several agencies in Malta were identified as having a significant impact on the development and delivery of policies. The Foundation for Social Welfare Services, the Office of the Commissioner for Children, the Directorate for Learning and Assessment Programs, and the Cyber Crime Unit all have important public functions recognised in law with regard to safer and better internet delivery. In the cases of Ireland and Germany, in addition to existing agencies active in the area, there is also a reference to the establishment of new entities with supervisory powers and oversight.

More generally, while acknowledging the vital role that civil society plays in better internet policies, evidence from the case studies suggests that increasing emphasis is being given to statutory-based public agencies to discharge functions associated with online safety and the protection of young people in the digital environment.

Leadership is a further important aspect of the backbone organisation

Noting the complexity of the relationships between multiple organisations and stakeholders in a federal country such as Germany, the need for not just coordination but also leadership in the policy domain is crucial. The BIK Policy Map has repeatedly drawn attention to the risks of fragmentation with responsibilities dispersed across multiple ministries and sought information in its survey on how coordination is achieved at the practical level. In the case study in Ireland, the new legislative approach creates a new Media Commission and a designated Commissioner for Online Safety as the proposed approach to providing leadership. Supervisory powers including those of the Digital Services Coordinator as required under the Digital Services Act, will be vested in one office with clearly defined roles and functions set out in primary legislation. While this approach is specific to the conditions pertaining to the Irish case study, it is indicative of the issue of leadership required in such a diverse area.

In Nordic countries such as Finland, media councils or authorities have also played an equivalent leadership role of which KAVI is also a good example. In Germany, this function is distributed according to the federal system across several media authorities and public agencies.

An underlying insight from the case studies is that, just as the common agenda to which the collective impact model refers should not always be seen as a unitary set of issues, so also levels of coordination and leadership required may also involve a number of different organisations. In other words, it is important to avoid a normative perspective that coordination and leadership is singular and unitary. Given the complexity of the issues involved in oversight of the digital sphere, the combination of specialised inputs from a number of different entities or centres may be more appropriate. What the collective impact model suggests is that regardless of the inputs, coordination for maximum effect is desirable.

3. Development of new indicators arising from the case studies

One of the objectives of this case study exercise is to examine new potential indicators arising from the more detailed studies of implementation which can be considered for inclusion in future iterations of the BIK Policy Map. Based on the approach of looking at the wider environment in which policymaking takes place rather than from the perspective of the implantation of goals set out in the BIK strategy, it is anticipated that other salient factors may be identified, and which may have relevance for other countries.

Table 2 sets out possible indicators as suggested by the case study analysis. These are organised by theme and, while not exclusive to one particular country or case study, are drawn primarily from the case study in which that theme was prioritised. An additional category of 'Other' is added to capture other indicators of interest.

This list is presented as a starting point for the inclusion of new elements within the BIK Policy Map Tool. It is a non-exhaustive list, but demonstrates how a bottom-up approach to policy making may be integrated into the BIK Policy Map to ensure the specificity of each country's position is captured.

Table 2: Potential indicators arising from the case studies

	Topic	Possible indicators
Case study 1: Ireland	**Integrated policy:** Single integrated legal framework.	• Is a common understanding of the problem (including specific references to the BIK strategy) present? • How is this communicated? Is there formal recognition as a public strategy, law or regulation? • Are there external drivers that have influenced the development of a common agenda? • What evidence exists to demonstrate acceptance of the common agenda?
Case study 2: Finland	**Policy coordination and design:** Formal co-operation mechanism between several competent authorities; focus on digital media literacies and education policy.	• What structures or mechanisms exist to support cooperation between the respective authorities? • What measures have been taken at the national level to address disinformation? • Are quality controls in place for research statistics? • Are studies available regarding media representations of children's involvement in the digital environment?

Case study 3: Malta	**Children's participation:** Active participation of children during the whole policy cycle.	• Is youth participation formally mandated in government policy or legislation? • Are children's rights formally recognised within national legislation? • Are there separate arrangements to coordinate across areas impacting on children's rights and well-being?
Case study 4: Germany	**Stakeholder involvement:** Focus on integrating user-generated content platforms in policy initiatives.	• What structures exist to support multistakeholder cooperation? • Is there a joint plan of action to which all stakeholders adhere? • Is industry formally represented within national stakeholder bodies?
Other	**Additional indicators which arise from the case studies**	• What arrangements are available to integrate the work of Safer Internet Centres (SICs) into government initiatives or programmes? • Description of the type of organisation – alignment with other regulatory functions such as the Digital Safety Commissioner (DSC). • Agencies with a statutory function to promote aspects of the BIK agenda or have specialised functions for the protection of minors. • How is leadership of the policy process demonstrated? In the case of distributed leadership, how is this coordinated? • Is there currently (or planned for the future) a separate or integrated backbone organisation (or unit of a party/partner who has been tasked with relevant tasks, especially coordinating the participating actors)? • Quantify the dedicated staff available to this function. • Information about voting age in national and/or regional elections.

4. Contribution to alignment with the BIK+ strategy

The final section of this report anticipates the next version of the BIK Policy Map. The fourth edition of the BIK Policy Map will present data in a framework that is consistent with the BIK+ strategy. This means that we will no longer refer to the four pillars of the original strategy and instead integrate them within the new pillars of the updated BIK+ strategy.

As shown in Figure 1, this is not just a matter of one less pillar in the new BIK+ strategy. There is also a difference in emphasis which means that the reporting of data from countries about policies and programmes will be presented in a different way and in a different order.

Better Internet for Kids (BIK Strategy)	The European strategy for a better internet for kids (BIK+)
Pillar 1 – High-Quality Online Content for Children;	Pillar 1 – A safe digital environment to protect children from harmful and illegal content
Pillar 2 – Stepping up Awareness and Empowerment	Pillar 2 – Empower children in the digital world and give them the necessary skills to make safe choices and express themselves online
Pillar 3 - Creating a Safer Environment for Children Online	Pillar 3 – Improve children's active participation, with more child-led activities to foster innovative and creative digital experiences
Pillar 4 – Fighting Against Child Sexual Abuse and Exploitation	

Figure 1: Comparison of BIK and BIK+ pillars

Pillar 1 – A safe digital environment of the BIK+ strategy encompasses the largest number of indicators, including all of the original Pillars 3 and 4 as well as elements of Pillars 1 and 2.

The new *Pillar 2 – Empowering children in the digital world* includes reference to all education and media literacy activities previously reported under Pillar 2 of the original BIK strategy.

Finally, the new *Pillar 3 – Improving children's active participation* has fewer indicators than the original BIK Policy Map Tool. However, as discussed in this report, new indicators will be added to the future tool to reflect this important policy priority.

From the evidence of this series of four case studies, the following preliminary observations can be made:

A safe digital environment (Pillar 1)

Pillar 1 contains commitments and activities to protect children from harmful and illegal online content, conduct, contact and risks as young consumers, and improve their well-being online through a safe, age-appropriate digital environment, created to respect children's best

interests. Most proposals and commitments under Pillar 1 are responsibilities of the European Commission. This includes key measures of facilitating the design of a comprehensive EU code of conduct and developing measures to support age verification mechanisms. The Commission invites Member States to support this work with corresponding activities at the national level and it is this area where the BIK Policy Map will focus in the future.

From the case studies, several significant policy developments stand out that contribute to Pillar 1. These include:

- Ireland's Online Safety and Media Regulation Act 2022 is an example of national legislation seeking to create a safer digital environment by implementing binding codes of conduct across the digital sector. Working in tandem with EU legislative provisions for the regulation of video-sharing platforms (AVMSD) and very large online platforms (DSA), the newly created structures will implement a systemic approach to regulation in which digital service providers will be held accountable for failure to implement appropriate standards.

- In Germany, the reformed JuSchG (Jugendschutzgesetz, Youth Protection Act) has extended its objectives, now including "*the protection of the personal integrity of children and young people when using media*". The new legislation aims specifically at countering new risks that are based on communication and interaction, especially cyberbullying, cybergrooming and hate speech. Regarding user-generated platform providers, the new § 24a JuSchG states that "*service providers who store or provide third-party information to users […] must take appropriate and effective structural precautionary measures to ensure that the protection objectives […] are respected*".

- Both represent significant national initiatives which contribute directly to Pillar 1 and align closely with the goals of the BIK+ strategy. Accordingly, progress in the implementation of these initiatives will be followed closely as part of the BIK policy mapping activity.

Empowering children in the digital world (Pillar 2)

The aim of Pillar 2 is to ensure that all children, including those in situations of vulnerability, acquire the necessary skills and competencies to make sound choices and express themselves in the online environment safely and responsibly. A key focus of Pillar 2 is on developing digital and media literacy skills essential to equipping children with the knowledge and competencies to keep safe online and benefit from its opportunities.

Pillar 2 invites Member States to support EU-level activities, for example by monitoring the impact of the digital transformation on children's well-being and exchanging good practices under the relevant Expert Groups and structured dialogue progress. Notably, Pillar 2 also calls on Member States to promote Safer Internet Centres as a one-stop-shop for trustworthy resources on media literacy and online safety for children, their families and teachers. However, it is in the area of education which, as the competence of the Member States, will be the most significant in contributing to the delivery of this pillar.

From the case studies, a number of elements are noteworthy:

- There are a number of valuable lessons that can be learned from the development of media literacy and media education in Finland. Overall, the case study of Finland

shows how the permeation of media literacy across the education system can have a significant societal impact. A distinctive feature of the approach in Finland is making media literacy a matter of civic competence for all and a feature that has become central to public discourse in the country. From an educational perspective, the focus on positive skills rather than on risks has been an important message that has assisted in the take up of its key messages.

- Another aspect that emerges from the case studies is industry'spotential to support children's empowerment and attainment of media literacy. Partnership initiatives have been to the fore in many countries, with diverse companies and digital providers contributing their expertise and resources in collaborative partnership activities. This is especially important in ensuring that resources and materials are available in all local languages and that children are supported using culturally specific and appropriate resources.

Improving children's active participation (Pillar 3)

The aim of Pillar 3 is to give children a say in the digital environment, with more child-led activities to foster innovative and creative safe digital experiences. Under Pillar 3, the Commission invites Member States to support training including child-to-adult teaching on digital, and to engage an inclusive range of youth ambassadors to contribute to digital policies at the local, regional and national levels.

The BIK Policy Map to date has followed activities related to child and youth participation. The work of SIC youth ambassadors is especially noteworthy in this regard, and nearly all Member States include this as an important part of their contribution to EU policy goals for youth participation. From our case studies, a number of other factors emerge that have the potential for further development with the BIK Policy Map.

- Malta provides an excellent example of the active participation of young people and the factors that make it a success. These factors include a structured and formalised process, the innovative use of technology, and tangible results which are widely communicated. Malta's achievement of political change because of active youth involvement is highly noteworthy.

- In Finland, the involvement of youth councils and the prominent role played by digital youth are active expressions of its media literacy policies demonstrating how empowering children in the digital environment and their active participation in digital policy can constructively work hand in hand.

- The case study of Ireland also offers relevant examples for Pillar 3. Ireland adopted a national strategy for the participation of young people in decision making. This has contributed to a growing body of work at a governmental level where young people are involved in a systematic way in contributing to policies which have an impact on their lives.

- In the German case study, while a number of features of active participation are noted, it is also observed that the element of direct youth participation is somewhat lacking except for the newly established BzKJ Board, where legislation requires two youth representatives among its members.

Annex 1: Ireland case study

1. Introduction

One of the indicators included in the BIK Policy Map tool is the existence of a single legal framework for all BIK-related areas, thereby providing evidence of an integrated approach to policymaking. In the third BIK Policy Map report, there were just two countries that met this criterion, Ireland and Slovenia. For the purposes of undertaking a detailed case study and country profile, Ireland has been selected as an example of an integrated approach in policy and legal frameworks for online safety and better internet aspects.

Many leading ICT and digital services companies have their European headquarters in Ireland. Companies with long-established operations include Intel, HP, IBM, Microsoft and Apple. More recently, internet and social media companies such as Google, Facebook, LinkedIn, Amazon, PayPal, eBay and Twitter have all established a significant presence in Ireland. Dublin is Europe's leading hub of innovative games companies with Big Fish, EA, Havok, DemonWare, PopCap, Zynga, Riot Games and Jolt all having a significant presence here.[15] The sector accounts for more than €50 billion of exports from Ireland per annum.

Under the EU's country of origin principle, regulatory responsibility for certain aspects of digital services falls under regulators such as the Irish Data Protection Commission. With the enactment of the Online Safety and Media Regulation Act 2022, a new regulator, Coimisiún na Meán, will undertake the regulation of video-sharing platforms under the rules of the revised Audiovisual Media Services Directive (AVMSD). For these reasons, the development of integrated policy frameworks has been an important priority for successive governments.

In this case study, the main features of Ireland's approach to online safety and better internet policies are examined through the lens of the collective impact framework. Particular attention is given to identifying factors underpinning the integrated policy approach.

2. Common agenda

According to the collective impact framework, a common agenda refers to a shared vision among all participants for change including a common understanding of the problem and a joint approach to solving it through agreed-upon actions.[16]

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[15] Enterprise Ireland, ICT Sector Profile. Available at: https://www.enterprise-ireland.com/en/Start-a-Business-in-Ireland/Startups-from-Outside-Ireland/Key-Sectors-and-Companies-in-Ireland/ICT-sector-profile.html
[16] Kania, J., & Kramer, M. (2011). Collective Impact. *Stanford Social Innovation Review, Winter*, 36–41.

Common understanding of the problem

In 2020, the Online Safety and Media Regulation Bill (OSMR)[17] was brought forward, integrating broadcasting legislation, transposition of the Audiovisual Media Services Directive and new proposals for the regulation of harmful online content. The Bill provided for the appointment of an Online Safety Commissioner as part of a wider Media Commission to oversee a new regulatory framework for online safety to deal with the spread of harmful online content. The Commissioner will govern this new framework through binding online safety codes and robust compliance, enforcement and sanction powers. Online safety codes will deal with a wide range of issues, including measures to be taken by online services to tackle the availability of harmful online content, for example cyberbullying material, on their services. The legislation was enacted on 28 December 2022 and the new regulator, Coimisiún na Meán, was established in March 2023.

While the OSMR Act does not specifically reference the BIK strategy, its influence is manifest and incorporated extensive stakeholder consultation including with the Safer Internet Centre and other stakeholder groups. Integration with EU policy initiatives is also an important priority among policy makers. At the same time, the BIK strategy was an important support to the preceding Action Plan for Online Safety 2018-2019.[18]

Shared vision for change

Issues of children's online safety, as well as online safety for all, has been the subject of considerable public debate, attracting much media attention in Ireland. High profile cases involving breaches of privacy or abuse of children have contributed to calls for greater public action. The Minister for Communications convened a high-level task force in 2014 to advise on options for online content governance[19] while the Law Reform Commission undertook a review of existing legal provision related to harmful digital communications. Its subsequent report first recommended establishing the role of Digital Safety Commissioner, modelled on comparable offices in Australia and New Zealand.[20]

Stakeholder consultation and the development of shared approaches have been important features of online safety policy making in the Irish context. An Open Policy Debate on Online Safety was hosted by the Minister for Communications, Climate Action and Environment in March 2018.[21] Over 120 representatives from a range of stakeholders participated in the event, including NGOs, industry, parents' groups and young people. The Open Policy Debate informed the development of the Action Plan for Online Safety 2018-2019 (see below), which aimed to "*set out in a coherent plan the actions that are being undertaken across*

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[17] https://www.gov.ie/en/publication/d8e4c-online-safety-and-media-regulation-bill/

[18] Hogan, J., & Murphy, M. P. (Eds.). (2021). *Policy Analysis in Ireland* (1st ed.). Policy Press.
[19] Department of Communications Energy & Natural Resources. (2014). *Report of the Internet Content Governance Advisory Group.* https://arrow.tudublin.ie/cserrep/52/
[20] Law Reform Commission. (2016). *Final Report on Harmful Communications and Digital Safety.* http://www.lawreform.ie/news/report-on-harmful-communications-and-digital-safety.683.html
[21] https://merrionstreet.ie/en/news-room/releases/naughten_hosts_government per centE2 per cent80 per cent99s_open_policy_debate_on_digital_safety.html

government departments and agencies to protect children and adults in their online engagement".[22]

Noteworthy also in this context is the commitment at the national level to embedding processes of youth consultation in the policy process. Ireland is relatively unique in adopting a national strategy for youth participation. Its *National Strategy on Children and Young People's Participation in Decision-making, 2015-2020,*[23] facilitates children's active involvement in policy processes and includes a youth participation hub to support government departments to give children and young people a voice in decision making.[24] The Office of the Ombudsman for Children contributed a report to extend participation through social and digital media.[25]

Stakeholder engagement in the development of the OSMR Act included a public consultation held in 2019 to inform the drafting of the legislation, a virtual workshop on the regulatory framework for online safety attended by all relevant stakeholder groups, and input from the National Advisory Council for Online Safety.[26]

All-party, Joint Oireachtas (Parliamentary) Committees also play an important role in facilitating political debate and providing pre-legislative scrutiny for policy proposals coming forward. For example, the Joint Committee on Children and Youth Affairs held hearings and published a report in 2018 on Cyber Security for Children and Young Adults.[27] In the case of OSMR, the Joint Committee on Tourism, Culture, Arts, Sport and Media presented its Report on the Pre-Legislative Scrutiny of the General Scheme of the Bill in 2021.[28]

An aspect of current policy debates which has attracted considerable attention is the extent to which the regulatory framework should be systemic in nature, i.e., directed at securing long-term industry-wide changes in online safety, or should – in addition – have a consumer or user-facing function. The Joint Oireachtas report along with many civil society groups[29] recommended the inclusion of an independent complaints mechanism as part of the regulatory functions of the Media Commission. Following its report, the Minister appointed an independent expert group to examine whether an individual complaints mechanism could be provided for and, if it can, in how it would work in practice. Its recommendations are to be

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[22] Action Plan for Online Safety, 2018-2019, p.15.
https://assets.gov.ie/27511/0b1dcff060c64be2867350deea28549a.pdf
[23] Department of Children and Youth Affairs (2015) National Strategy on Children and Young People's Participation in Decision-making, 2015 – 2020. Dublin: Government Publications. Available at: www.dcya.ie
[24] https://hubnanog.ie/what-is-hub-na-nog/
[25] O'Neill, B., Dinh, T., & Lalor, K. (2021). *Digital Voices: Progressing children's right to be heard through social and digital media* (p. 114). Ombudsman for Children's Office. https://www.oco.ie/app/uploads/2021/09/Digital-Voices-Progressing-Childrens-right-to-be-heard-through-social-and-digital-media.pdf
[26] https://www.gov.ie/en/publication/d8e4c-online-safety-and-media-regulation-bill/#stakeholder-consultation
[27]
https://data.oireachtas.ie/ie/oireachtas/committee/dail/32/joint_committee_on_children_and_youth_affairs/reports/2018/2018-03-29_report-on-cyber-security-for-children-and-young-adults_en.pdf
[28]
https://data.oireachtas.ie/ie/oireachtas/committee/dail/33/joint_committee_on_tourism_culture_arts_sport_and_media/reports/2021/2021-11-02_report-of-the-joint-committee-on-the-pre-legislative-scrutiny-of-the-general-scheme-of-the-online-safety-and-media-regulation-bill_en.pdf
[29] https://www.childrensrights.ie/resources/press-release-individual-complaints

considered in due course as the legislation progresses through the Houses of the Oireachtas.[30]

Existing common (progress-oriented) agenda

Ireland's Action Plan for Online Safety (2018-19)[31] was a national initiative that immediately preceded the formulation and framing of new legislation for online safety. Building on various previous government-sponsored national initiatives dating back to the early 2000s[32] and informed by the Open Policy Debate of 2018, the Action Plan sought to consolidate a response to online safety as one of enabling all citizens to avail of the positive impacts of online engagement while equipping them with the skills to manage online risks ranging from the most serious and criminal forms to content or online contacts that may be harmful. The Action Plan acknowledged that while the State has a role to play in ensuring the public's safety, it does not have all the answers. Accordingly, it outlined a series of actions to be implemented within a relatively short timeframe of 18 months focusing on education, information and awareness raising; international law making; and engaging with a diverse range of stakeholders (2018, p.12).

The Action Plan for Online Safety 2018-2019 centred on five goals:

- Goal 1: Online safety for all. Including developing a single online access point where all relevant advice and information may be accessed.[33]

- Goal 2: Better supports to include digital citizenship in schools and improved online links to mental health supports and services.

- Goal 3: Stronger protections to include legislation for new criminal offences, responding to harmful and illegal content, and improved industry responses.

- Goal 4: Influencing policy to include working with the EU and international partners on improved policy, legislation, and regulation; developing national regulatory and policy responses and strengthening national protective measures.

- Goal 5: Building our understanding to include the establishment of a new National Advisory Council for Online Safety and to research and publish an annual Safer Internet Report.

Two progress reports were produced on the attainment of the targets set over the lifetime of the Action Plan and are published on its website.[34]

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[30] See Report of the Expert Group on an Individual Complaints Mechanism, May 2022. Available at: https://assets.gov.ie/234897/7b1b1a0c-4405-41a2-a942-bcb2c59fabe0.pdf

[31] Government of Ireland. (2018). *Action Plan For Online Safety 2018-2019*. https://www.gov.ie/en/campaigns/be-safe-online/

[32] O'Neill, B., & Dinh, T. (2013). Children and the internet in Ireland: Research and policy perspectives. In *Digital Childhoods Working Paper Series (4)*. https://doi.org/10.21427/D74J5V

[33] https://www.gov.ie/en/campaigns/be-safe-online/

[34] https://www.gov.ie/en/campaigns/be-safe-online/

Degree of acceptance of/commitment to common agenda

Ireland's online safety policy has received broad support across the political spectrum and among stakeholders. The proposals to establish an integrated Media Commission and a new role of Online Safety Commissioner has been debated since first proposed in 2014. In introducing the legislation, the government agreed to incorporate several alternative proposals from opposition parties. It continued cross-party consultation and accepted several amendments to the legislation during its passage through parliament. As noted by the Minister, the role of the Online Safety Commissioner was a key recommendation of the Joint Oireachtas Committee and has been identified as central to enforcing the regulatory framework for online safety set down by the Bill.[35]

The Children's Rights Alliance, an umbrella organisation representing over 100 member children's organisations, lent broad support to the legislation while advocating for changes to strengthen its online safety provisions. A national campaign – *the 123 of Online Safety* – lobbied for three key changes: ensuring adequate resourcing of the role of Online Safety Commissioner; inclusion of an education remit including the power to evaluate and regulate educational and community awareness programmes on online safety; and provision for an Individual Complaints Commission within the regulatory framework as a redress mechanism of last resort.[36]

A parliamentary report from the Houses of the Oireachtas Library and Research Service provided a detailed background of the stakeholder consultation process for the OSMR Act.[37]

Representativeness of formal partners/parties or amount of buy-in by third parties

Representative bodies involved in advising on online safety include a wide range of stakeholder interests.

The National Advisory Council for Online Safety (NACOS) is chaired by the Minister and has a core membership of 20, comprising representatives of academia, law enforcement, public agencies such as the Irish Data Protection Commission and the Ombudsman for Children's Office, child and youth organisations, member organisations of the national Safer Internet Centre, industry trade associations for the ICT sector, and representatives of leading technology firms. Senior officials from each of the six Sponsor Group departments attend

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[35] https://www.gov.ie/en/press-release/ca233-minister-martin-brings-forward-amendments-to-the-online-safety-and-media-regulation-bill/

[36] https://www.childrensrights.ie/resources/1-2-3-online-safety-campaign

[37] Library & Research Service (2022). *Insights into the OSMR Bill.* https://data.oireachtas.ie/ie/oireachtas/libraryResearch/2022/2022-02-22_l-rs-note-insights-into-the-osmr-bill-part-1-introduction-and-background_en.pdf

meetings of the NACOS in an advisory capacity. NACOS is the primary multi-stakeholder forum providing advice to government on online safety matters.

Other relevant multistakeholder bodies include:

- Media Literacy Ireland (MLI)[38] is an alliance of organisations working to promote media literacy in Ireland. Operating under the aegis of the media regulator, the Broadcasting Authority of Ireland. The Steering Group membership reflects the cross-sectoral nature of media literacy promotion such as Broadcast Media (including Community Media), Information Society, the Academic and Education sectors, Public Service Agencies, the Film sector, news publishers, Civil Society and Digital platforms.

- The Safer Internet Ireland Project,[39] Ireland's Safer Internet Centre, is a consortium of industry, education, child welfare and government partners that provide Safer Internet awareness, hotline and helpline functions and activities for the Republic of Ireland. The PDST, ISPCC Childline, the National Parents Council, and the Internet Service Providers Association of Ireland are the partners in the consortium.

- The Irish Digital Skills and Jobs Coalition[40] was established in April 2017 as an association-led, multi-stakeholder initiative bringing together 50 partners from academia and education, industry, the public and the not-for-profit sector. The primary objective of the Coalition is to strengthen the workforce and enhance the digital inclusion of all citizens, with a special focus on the digital skills of younger adults in the context of a modernised education system. The initiative is coordinated by the Irish Computer Society.

Coherence across policy initiatives

The Online Safety and Media Regulation Act 2022 established the new regulator, Coimisiún na Meán (the Media Commission), with a wide remit covering on-demand audiovisual media, video-sharing platforms and online safety. The establishment of a statutory regulatory function for online safety is a first in the European Union and is modelled, in part, on Australia's Office of the eSafety Commissioner, which itself was a world first.

The legal and regulatory position prior to OSMR drew on a diverse range of provisions covering defamation, harmful communications and sexual offences legislation involving several different government departments. The parliamentary Library and Research Service has produced an overview of the legislative provision on all matters related to online safety.[41]

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[38] https://www.medialiteracyireland.ie/
[39] https://www.webwise.ie/news/the-safer-internet-ireland-awareness-centre-2/
[40] https://digital-skills-jobs.europa.eu/en/about/national-coalitions/ireland-digital-skills-and-jobs-coalition
[41] Oireachtas Library and Research Service (2022). *Insights into the OSMR Bill Part 3: Introduction to the Current Legal and Regulatory Framework.* https://data.oireachtas.ie/ie/oireachtas/libraryResearch/2022/2022-02-22_l-rs-note-insights-into-the-osmr-bill-part-3-introduction-to-the-current-legal-and-regulatory-framework_en.pdf

The third BIK Policy Map Study[42] identified six government departments which shared responsibility for various aspects of online safety. Despite this, stakeholders regard the approach to be generally consistent with a high degree of coherence on online safety matters. Three ministries share particular responsibility for aspects of policymaking and implementation:

- The Department of Tourism, Culture, Arts, Gaeltacht, Sport and Media leads on structured engagements by departments with online platforms and review of the Audiovisual Media Services Directive (AVMSD), and also provides the secretariat to the National Advisory Council for Online Safety.

- The Department of Education leads on school policy development including support for Webwise.ie – the national awareness node – and support for schools, teachers, students and parents.

- The Department of Justice leads on oversight of Hotline.ie, legislative changes to criminal law, liaison with Garda Síochána on implementation/enforcement issues, and disbursement of EU funding.

An inter-departmental group, the Sponsors' Group, established under the Action Plan 2018-2019, is in place for the purposes of cross-departmental communication and coordination.

3. Measurement system

The collective impact framework emphasises the importance of a shared measurement system and agreement on the ways success is measured and reported with key indicators by all participating organisations. Applying this to the online safety and better internet domain, the following is a brief summary of the measurement systems in place and methods of evaluation and progress reporting that apply.

Ex-post evaluation and key indicators for progress and/or success

- Regulatory impact analysis (RIA) is carried out by all government departments on proposals for primary legislation such as OSMR and for EU directives and significant EU regulations. The Regulatory Impact Assessment of the OSMR was carried out in November 2020 and considered a range of options with particular reference to the transposition of the AVMSD.[43]

- The Safer Internet Ireland Project, co-funded by the European Union, is overseen by the Department of Justice, and is subject to periodic review and evaluation at the EU

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level. The *Irish Safer Internet Centre Public Report* (2021) provides an overview of impact in the period July 2019 to June 2021.[44]

- The National Advisory Council for Online Safety (NACOS) acts as the national stakeholder forum for the purposes of EU-funded programmes and provides an annual report for government to coincide with Safer Internet Day (SID). It also publishes regular progress reports in respect of online safety matters at a national and international level.[45] Its function is advisory, however, and neither NACOS nor other oversight bodies such as the Advisory Board for the Safer Internet Centre has an accountability function to hold stakeholders accountable for goals and measurements.

Data collection

Data collection on online safety and better internet policy topics is irregular. EU Kids Online has provided some of the most detailed statistics on online safety with reports in 2011, 2015 and 2020.[46]

- NACOS commissioned a national survey of children, their parents and adults in 2021.[47] The research was commissioned following a NACOS recommendation in 2019 that research be undertaken to address gaps in the evidence base about the state of online safety in Ireland. Fieldwork for the research was carried by Ipsos MRBI between December 2019 and October 2020, covering the period both before and after COVID-19 restrictions. The survey was modelled on EU Kids Online, and the dataset was integrated into European countries' 2020 EU Kids Online survey.[48]

- Growing Up in Ireland, a national longitudinal study, is managed by the Department of Children and Youth Affairs in association with the Central Statistics Office. The survey includes a smaller number of questions related to digital technology and online use.[49]

- CybersafeKids, a not-for-profit organisation established in 2015 working to empower and educate children, parents and teachers to navigate the online world safely, undertakes an annual survey of all participants in its training workshops.[50]

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[44] Department of Justice (2021). *Irish Safer Internet Centre Public Report – Working towards a positive and inclusive digital world where children are safe and protected.* https://www.justice.ie/en/JELR/30 per cent20August per cent202021 per cent20Irish per cent20SIC-SII7 per cent20Public per cent20Friendly per cent20Report-FINAL.pdf/Files/30 per cent20August per cent202021 per cent20Irish per cent20SIC-SII7 per cent20Public per cent20Friendly per cent20Report-FINAL.pdf

[45] https://www.gov.ie/en/publication/ebe58-national-advisory-council-for-online-safety-nacos/

[46] See EU Kids Online, Ireland Country page (n.d.) https://www.lse.ac.uk/media-and-communications/research/research-projects/eu-kids-online/participating-countries/ireland

[47] https://assets.gov.ie/204409/b9ab5dbd-8fdc-4f97-abfc-a88afb2f6e6f.pdf

[48] EU Kids Online (2020). EU Kids Online 2020: Survey results from 19 countries. https://www.eukidsonline.ch/files/Eu-kids-online-2020-international-report.pdf

[49] https://www.growingup.ie/

[50] https://www.cybersafekids.ie/

- More general indicators of ICT and online usage include the Digital Economy and Society Index (DESI)[51] which provides comparative data at the EU level across a number of digital indicators.

- The ICT Household Survey carried out by the Central Statistics Office[52] is carried out on an annual basis and collects data on households' access to and individuals' use of the internet. The survey covers a range of topics related to internet penetration and the use of ICT by households and individuals, providing information on households' and individuals' use of the internet and other information and communication technologies (ICTs). The survey includes individuals 16 years and over.

- An annual Irish Digital News Report is carried out by the DCU Institute of Future Media, Democracy and Society (FuJo) at Dublin City University, supported by the Broadcasting Authority of Ireland. This is part of the global Reuters Digital News Report, based at Oxford University, and is the largest ongoing comparative study of digital news consumption, taking in 46 countries.[53]

Progress/result measurements (common metrics)

While data collection and research capacity at a national level appear to be growing, indicated by the increasing number of research studies included in the Children Online: Research and Evidence (CO:RE) Knowledge Base,[54] the evidence base overall remains uneven. A positive impact of the EU Kids Online and Global Kids Online research networks is that their indicators have been incorporated into a broad range of studies. However, different methodologies and irregular patterns of data collection mean that it is difficult to identify trends or assess the impact of online safety measures.

As such, it is possible to say there is a developing shared measurement approach represented by surveys such as CyberKids.ie, NACOS and other studies which conform to the conceptual model advanced by EU Kids Online. However, the lack of a consistent approach to data collection at a national level suggests that this is not a fully developed shared measurement framework and that further work is needed to develop measurement systems to assess collective impact.

Refinements upon key insights/identified hurdles

Existing data collection and research findings are extensively used in awareness-raising activities, in the development of educational resources, and in informing policy developments. The NACOS survey of 2020 was the largest national survey undertaken to date and provided a baseline for the purposes of evaluating future developments.

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[51] https://digital-strategy.ec.europa.eu/en/policies/desi
[52] https://www.cso.ie/en/releasesandpublications/ep/p-isshh/informationsocietystatistics-households2020/introductionandkeyfindings/
[53] https://www.digitalnewsreport.org/survey/analysis-by-country/2020/ireland-2020/
[54] https://core-evidence.eu/

Webwise.ie, the national awareness node in the Irish Safer Internet Centre, develops an extensive range of educational materials for primary and secondary school use. It draws on research findings to highlight areas of particular focus and includes a research component in its annual Safer Internet Day campaigns. Similarly, the National Parents' Council Primary, also a partner in the Safer Internet Centre, regularly undertakes and features research findings on digital parenting.

NACOS has established a Research Working Group to examine national and international research and communicate key findings to the government, stakeholders and the wider public. The newly-established Coimisiún na Meán also has a research remit and is likely to adopt an evidence-based approach.

4. Mutually reinforcing activities

According to the collective impact framework, mutually reinforcing activities refer to the engagement of a diverse set of stakeholders, typically in multiple sectors, coordinating a set of differentiated activities through a mutually reinforcing plan of action. With a focus on the specific theme of an integrated policy framework, this is considered below in the context of the activities of two bodies – the National Advisory Council for Online Safety and the Media Literacy Ireland network – as examples of coordinated joint action at a national level which has sought to positively impact young people's experiences of the digital environment.

National Advisory Council for Online Safety

The National Advisory Council for Online Safety[55] was established in 2019 as a forum for non-governmental, industry, and academic stakeholders to discuss and work on online safety issues. The Council was formed as part of the Action Plan for Online Safety 2018-2019. It replaced an earlier multistakeholder group – the Internet Safety Advisory Committee (ISAC) – which had been in place since 2004 as an advisory body to the then Office for Internet Safety. The Council is chaired by the Minister and has 20 members drawn from children's and parents' organisations, major online platforms, and experts on online safety issues. The Council's role is to advise the government on online safety issues, assist in developing online safety guidance, and support the dissemination of international and national research findings.

The terms of reference of NACOS, established in accordance with Action #20 of the Action Plan for Online Safety, are as follows:

1) Provide advice to the government on online safety policy issues.

2) Identify emerging issues where government intervention may be warranted, including in future iterations of the government's action plan.

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[55] https://www.gov.ie/ga/foilsiuchan/ebe58-national-advisory-council-for-online-safety-nacos/

3) Input to the development of clear and easy to understand online safety guidance materials for all internet users, including targeted material for children and young people, parents, persons with learning disabilities, and older people.

4) To act as the national stakeholder forum for the purposes of EU-funded programmes.

5) Review national and international research and disseminate key findings to government, stakeholders, and the wider public.

6) Provide an annual report for government to coincide with Safer Internet Day.

NACOS publishes an annual work programme and progress reports in respect of actions agreed. The Council also established two working groups: Research and Evidence, and Information and Guidance. In 2019, the Council oversaw commissioning a large-scale research project to develop a strong evidence base and robust benchmark for online safety initiatives and future research. More recently, the Council provided substantive feedback and input on the proposed Online Safety and Media Regulation Bill, the general scheme of which was published on 10 January 2020.

Media Literacy Ireland

Media Literacy Ireland (MLI)[56] was established in 2018 as an independent, informal alliance of organisations and individuals working together voluntarily to promote media literacy in Ireland. Facilitated and supported by the national media regulator, the Broadcasting Authority of Ireland (BAI), MLI is an unincorporated body with members drawn from many sectors including the media, communications, academia, online platforms, libraries and civil society. Its aim is to foster discussion, identify gaps in media literacy provision, and bring stakeholders together to help fill those gaps. MLI acts as an enabler for media literacy stakeholders in Ireland. Its work is focused on four key work strands: coordination, communication, innovation and promotion. It currently has over 240 members.

Following on the Media Literacy Policy of the BAI, the alliance seeks to leverage the network of diverse stakeholders to empower Irish citizens with the skills and knowledge to make informed choices about the media content and services they consume, create and disseminate across all platforms. As articulated in the BAI strategy, media literacy is understood as the ability to understand and critically evaluate broadcast, online and other media content and services in order to best manage media use.

A particular focus for its multistakeholder activities has been public awareness about critical thinking skills needed to counter disinformation. The alliance launched a national Be Media Smart campaign, encouraging people to "Stop, Think and Check" that the information they are getting is accurate and reliable. The campaign originated as part of a European initiative to counter disinformation in the lead up to the 2019 European elections. In 2020, the campaign evolved to focus on accurate and reliable information about COVID-19 and in

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[56] https://www.medialiteracyireland.ie/

2021 the initiative focussed on the need to make informed choices about the COVID-19 vaccination based on accurate and reliable information.

The Be Media Smart campaign was delivered across TV, radio, online, and the press, supported by free air-time, editorial, online credit, social media activity and events from a very wide range of MLI members. RTÉ, TG4, and Webwise made particularly significant contributions in the development stage, while additional key strategic contributions were made by Virgin Media, Sky Ireland, Learning Waves and the commercial radio sector, the community media network, Newsbrands Ireland, the Library Association of Ireland, and the online platforms.

This initiative clearly demonstrated the power of collaboration when MLI members play to their own strengths. At the campaign's peak, it was estimated that about 2 million people encountered the Stop, Think and Check message. Research carried out by Ipsos MORI in June 2020 indicated that 27 per cent of adults recalled the campaign unprompted. MLI has also used the media literacy framework set out in the BAI Media Literacy Policy to help people develop the skills and knowledge to understand and critically evaluate media, to access and use media, and to create and participate via media in a responsible, ethical and effective manner in the creative, cultural and democratic aspects of society.

These two examples exemplify aspects of mutually reinforcing activities envisaged by the collective impact framework. While NACOS is explicitly focused on online safety and MLI on media literacy, both have come to act as coordinating multistakeholder bodies, bringing key actors together and encompassing key elements of public-private partnership in the conceptualisation and delivery of initiatives. Importantly, as will be noted under Section 5 below, both also have the support of a backbone organisation in the form of a government department in the case of NACOS and a media regulatory authority in the case of MLI. Both bodies have enjoyed success in bringing diverse perspectives together and have made efforts to ensure that all relevant sectors are represented and included. This cross-sectoral approach has allowed significant progress in developing common goals and delivery based on sharing resources and multiple inputs.

Challenges identified in sustaining the activities of bodies such as these are that they rely on voluntary input and additional effort by individuals and organisations with their own concerns. Stakeholders tend to agree that the activity could be sustained at all without the support of an overarching 'backbone' organisation and team. Funding and continuity were also identified as further challenges.

5. Communication

The collective impact approach suggests that consistent and open communication is needed across the many players to build trust, ensure mutual objectives, and create common motivation. Communication activities are seen as an important means of building public awareness and commitment to the goals of the initiative and the objectives for social change. As with other aspects of the framework, this is not always directly applicable to

online safety as a policy issue – particularly given its basis as a governmental legislative initiative – though, as set out in the preceding sections, some elements are relevant.

- Communication in respect of the development of the Online Safety and Media Regulation Act 2022 received extensive support. A departmental website[57] was set up to provide full documentation of the process, including a range of explanatory materials, outputs of the impact analysis, and details of the consultation process.

- There is a commitment to openness and transparency in all such legislative processes. Responses to the public consultation from industry, civil society, trade associations etc. are all published on the website of the Department of Tourism, Culture, Arts, Gaeltacht, Sport and Media (TCAGSM). Government debates, progress in the legislation, and parliamentary committee hearings are all documented online, with many available via live video stream.[58]

- Deliberations of the National Advisory Council for Online Safety are also made publicly available on its website.[59]

- At civil society level, the Children's Rights Alliance is an umbrella organisation for over 130 organisations and has coordinated awareness and public debate about online safety for children. The "1,2,3 Online Safety Campaign"[60] was established to call for key changes in the then-draft legislation to ensure it facilitated a safer, more positive online environment for children and young people.

- The Safer Internet Centre also plays a key role in raising awareness and contributing educational resources and online safety guidance resources. Webwise, which is the SIC's awareness node, develops and disseminates educational resources to integrate digital citizenship and online safety into teaching and learning in schools. Webwise also provides parents' information, advice, and tools to support their engagement in their children's online lives. The Webwise Youth Advisory Panel also develops youth-oriented awareness-raising resources and training programmes that address topics such as online well-being, cyberbullying and more. Webwise coordinates Safer Internet Day in Ireland, which has become a landmark event in the online safety calendar.

- The Irish Society for the Prevention of Cruelty to Children (ISPCC) operates Childline, which provides a 24/7 active listening service across phone, text and online for anyone under the age of 18 concerned about something they have encountered online, or other issues. The National Parents Council Primary operates the parent/adult helpline, dedicated to helping parents and guardians deal with issues relating to online safety, including cyberbullying. The NPC also provides parents with training courses, both online and face-to-face.

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[57] https://www.gov.ie/en/publication/d8e4c-online-safety-and-media-regulation-bill/
[58] https://www.oireachtas.ie/en/bills/bill/2022/6/
[59] https://www.gov.ie/en/publication/ebe58-national-advisory-council-for-online-safety-nacos/
[60] https://www.childrensrights.ie/resources/1-2-3-online-safety-campaign

- There have been several notable industry and civil society partnerships in online safety that have served to support additional educational capacity and awareness raising. The ISPCC partnership with the Vodafone Ireland Foundation has supported several initiatives related to education, helplines and resources, including a Digital Parenting Hub.[61]

- Google supports the Barnardo's children's charity in delivering the *Be Internet Legends* programme around the country.[62]

- Meta has provided support to the National Anti-Bullying Centre in the development of a multi-annual research and education programme. *FUSE* is the first research-based anti-bullying and online safety programme designed to comply with UNESCO's Whole Education Approach to tackle bullying and online safety in schools.[63]

6. Backbone organisation

According to the framework, creating and managing collective impact requires a separate organisation or organisations with staff and a specific set of skills to serve as the backbone for the entire initiative and coordinate participating organisations and agencies. Policy coordination has been an important theme in successive iterations of the BIK Policy Map. Many instances reported of a lack of or inconsistent coordination at the country level, hampering the effective delivery of programmes. The availability of a supporting backbone organisation is especially important in the development of an integrated policy framework, given the need to manage the diverse perspectives and inputs of different stakeholder groups.

Separate/integrated backbone organisation

- According to the third BIK Policy Map, six government departments share responsibility for aspects of online safety and better internet policies. The Action Plan for Online Safety provides for an inter-departmental communication mechanism through the Sponsors' Group.[64]

- Three government departments have particular responsibilities in this regard. Oversight of the Safer Internet Centre remains with the Department of Justice, where it has been since its inception. It also previously hosted the Office for Internet Safety (OIS) until 2016. The Department of Tourism, Culture, Arts, Gaeltacht, Sport and Media (TCAGSM) leads on structured engagements by departments with online platforms and new legislation, including OSMR and the Audiovisual Media Services Directive (AVMSD). The Department of Enterprise, Trade and Employment (DETE) leads on oversight of the E-commerce Directive (2000/31/EC), coordination of the EU Digital Single Market

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[61] https://www.ispcc.ie/ispcc-digital-ready-hub/
[62] https://www.barnardos.ie/news/2019/september/googleorg-provides-1-million-euro-grant-to-barnardos-to-help-make-the-internet-safer-for-over-75-000-irish-children
[63] https://antibullyingcentre.ie/fuse/
[64] Action Plan for Online Safety 2018-2019. https://assets.gov.ie/27511/0b1dcff060c64be2867350deea28549a.pdf

strategy, and has responsibility for the implementation of the Digital Services Act (DSA).

- Stakeholders argue that there remains much fragmentation across the system and that a position of integrated policy coordination has not yet been achieved. However, with the advance of new legislation and the establishment of a new regulatory entity in the Media Commission in 2023, significant steps have been taken to consolidate online safety and coordination of policy, programmes and delivery around a single entity. As illustrated in Figure 2, the newly-established Media Commission has several different functions across the media landscape, including regulatory, developmental, education and public awareness functions. Adequate staffing and resourcing of Coimisiún na Meán has been a topic of public and political debate, with initial staffing levels envisaged of approximately 180 employees.[65]
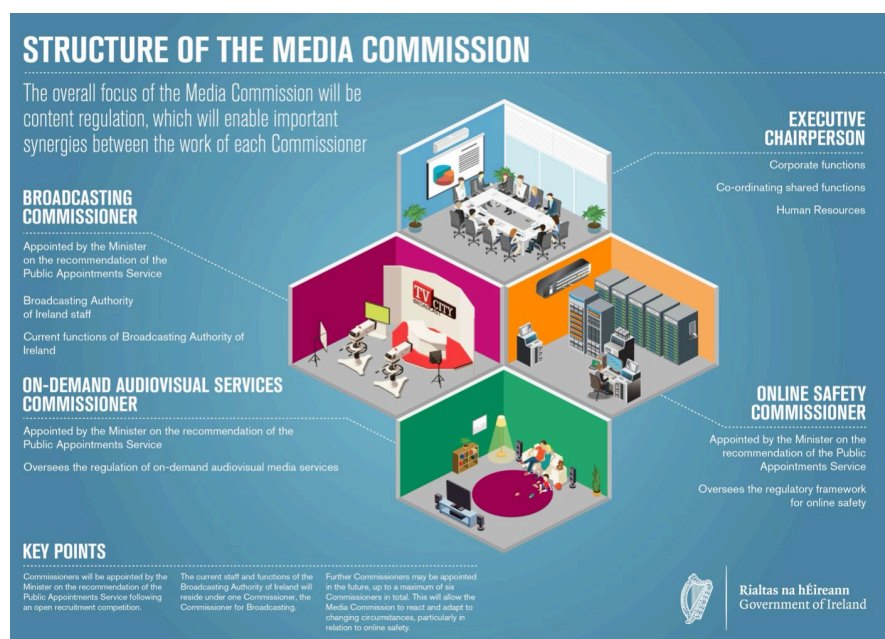

Figure 2: Structure of the Media Commission. Source: TCAGSM

Leadership, support and guidance activities

- Leadership has long been identified as a key element in ensuring acceptance and support for collective or collaborative forms of governance.[66] The approach adopted in Ireland is modelled on the Office of the eSafety Commissioner in Australia. As an independent statutory regulator, Coimisiún na Meán is tasked with promoting online safety, designating online services within the regulatory framework, administering statutory schemes in the form of online safety codes, and supporting public

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[65] Irish Times 24 March 2022, 'BAI seeks balance in transition to Media Commission'.
https://www.irishtimes.com/business/media-and-marketing/bai-seeks-balance-in-transition-to-media-commission-1.4834580
[66] Tambini, D., Leonardi, D., & Marsden, C. T. (2008). Codifying cyberspace: Communications self-regulation in the age of Internet convergence. Routledge.

awareness and engagement through education and research. The functions and proposed activities will be a first for EU Member States.

- In advance of the coming into effect of the Digital Services Act, and specifically, the obligation to designate a competent authority for implementing and enforcing the DSA in Ireland, the Government decided that Coimisiún na Meán will be the Digital Services Coordinator. National legislation will be needed to give effect to that designation which is to be in place by the time the DSA applies.[67]

- It is also anticipated that the National Advisory Council for Online Safety will transfer to the Coimisiún na Meán in due course, thus retaining its multistakeholder representation and consultative basis.

- SICs have been found in successive reports of the BIK Policy Map to be the most visible point of contact at the national level for online safety matters through the provision of hotlines, helplines and awareness raising. SIC youth panels have also been a vital platform for young people's voices on issues regarding digital participation. SICs have, since their inception, been co-funded by the European Commission under the Connecting Europe Facility (CEF) programme and, more recently, through the Digital Europe Programme (DIGITAL). Yet, funding for many participating organisations remains insecure. Many organisations report the inability to plan given the uncertainty regarding future funding.

- Industry and other NGOs are also sources of trusted guidance and advice on online safety. The presence in Ireland of global and EMEA headquarters for many large technology companies has facilitated closer engagement between industry and civil society, and given rise to several significant partnerships. Several national initiatives exist, providing information hubs and educational programmes through the support of philanthropy and other sources. Most of the relevant organisations participate in the National Advisory Council for Online Safety, contributing to better coordination of activities and campaigns.

7. Summary

This case study highlights some of the main factors underpinning the development of a single integrated policy framework for online safety and better internet in Ireland. Using the collective impact framework as an analytical tool, the following dimensions were assessed in terms of their significance in contributing to achievements in this area:

Common agenda

- A common understanding of the problem has been facilitated through the development of proposals for online safety legislation. These have been long in the making and have undergone several iterations resulting in a largely consensus-based

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[67] https://www.oireachtas.ie/en/debates/question/2022-05-19/28/

set of proposals for systemic regulation of the online sphere with provisions for sanctions, redress schemes and ancillary support functions.

- Adopting a multi-stakeholder approach, successive governments have sought to ensure that there is a shared vision for change with support from all stakeholders. The availability of consultation mechanisms, a multistakeholder forum, and political and sectoral support has been decisive. Alternative and additional proposals have been sent for consultation and expert opinion. Legislation has been open to amendment during its passage through parliament.

- EU legislation has had an important influence on the development of a common agenda. The transposition of the AVMSD provided the immediate context, while the development of the Digital Services Act package has provided additional impetus for the creation of national regulatory frameworks. The BIK strategy was a key influence in the development of Ireland's Action Plan for Online Safety 2018-2019 which immediately preceded the current framework.

Measurement system

- Impact analysis, and monitoring and evaluation, are formally embedded within the policy development process for online safety. Regulatory impact analysis has been carried out on all aspects of proposals for new legislative arrangements.

- Research was commissioned to support the development of an evidence base for child, parent and adult experiences of online safety issues. Longitudinal research and trend analysis remains uneven, however. The newly-established Coimisiún na Meán includes a research function as part of its role.

Mutually reinforcing activities

- Ireland has several examples of successful initiatives involving the engagement of diverse stakeholders and leveraging of cross-sectoral approaches.

- The establishment of a National Council for Online Safety representing various stakeholders, including public agencies, civil society, industry, education stakeholders and so on, has been an important contributor to building consensus. The model developed built on previous experiences of fora that included diverse voices. The inclusion of industry has always been a feature of such groups in the Irish experience.

- The involvement of the media regulator, the Broadcasting Authority of Ireland, in establishing a national alliance for media literacy is another example of a public agency leading and supporting multistakeholder dialogue and delivery of programmes.

Communication

- In tandem with mutually reinforcing activities, the availability of and support for high-quality communication was identified as an important factor.

- The open and transparent manner in which new legislative proposals have been developed has been welcomed by stakeholders and regarded as important for its

ultimate success. This has included the availability of public consultations, a well-documented process, public committee hearings, and public awareness campaigns.

- Separate civil society communication campaigns have also contributed to public awareness and debate. The role of an umbrella organisation representing children's charities has played an instrumental role in this.

Backbone organisation

- Support of a backbone organisation was identified as central to the achievement of a common agenda. Inter-departmental mechanisms and leadership in coordinating activities have proved effective despite the potential for fragmentation across multiple government departments.

- Proposed future arrangements envisage a central role being played by a backbone organisation in the form of the Media Commission. All stakeholders agree that this is essential. The functions of the new entity will be primarily regulatory in nature but will include public awareness, education and research functions.

- The converged nature of the approach bringing all regulatory aspects of the media landscape into one organisation is also regarded as significant.

Annex 2: Finland case study

1. Introduction

Finland is an advanced digital economy with a highly skilled workforce and a strong reputation for the quality of its educational system. It has the second highest level of mobile broadband penetration in the world with 147 subscriptions per 100 inhabitants, just behind Japan with 152 subscriptions. It also has a strong tradition of research and development (R&D) and has been setting R&D intensity targets for almost 50 years. At 15 researchers per thousand in employment, Finland and Denmark have the second highest rates, behind Israel (17) but ahead of Korea and Sweden (both at 14). Finland, together with Denmark and Norway, had the highest ICT-task intensity of jobs in manufacturing in 2012.

According to the OECD, 94 per cent of persons aged 16-74 in Finland were internet users in 2016, up from 77 per cent in 2006. Nearly all 16-24-year-olds are internet users, compared to 84 per cent in the 55-74 age group. Women in Finland accounted for about 28 per cent of tertiary graduates in natural sciences, engineering and ICT fields in 2015, below the OECD average of 31 per cent. In 2015, 11.4 per cent of domestic scientific documents in Finland were in the world's top 10 per cent most cited publications.[68]

In this case study, the focus is on the nature of the cooperation mechanisms between several competent authorities to achieve shared policy objectives with particular reference to digital media literacy. Finland has established an international reputation for the quality of its educational system and ranks among the top performers in many international studies. Finland is ranked #1 by the Economist in their "Educating for the future" index, while the OECD says Finland is #2 in the world for the highest-performing graduates. Finland also tops the Media Literacy Index, an annual index of European countries measuring resistance to fake news, and has a strong reputation for teaching media literacy in schools.

2. Common agenda

According to the collective impact framework, a common agenda refers to a shared vision among all participants for change, including a common understanding of the problem and a joint approach to solving it through agreed-upon actions.[69]

In Finland, the European Strategy for a Better Internet for Children has featured in national policy debates on the subject of children's use of the internet. This topic is covered in part of broader policies, principally through laws and regulations that address the BIK strategy's contents. "Stepping up awareness and digital empowerment" is managed by the National

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[68] https://www.oecd.org/finland/sti-scoreboard-2017-finland.pdf
[69] Kania, J., & Kramer, M. (2011). Collective Impact. Stanford Social Innovation Review, Winter, 36–41.

Audiovisual Institute[70] (KAVI), the public agency responsible for providing access to a range of resources and policy initiatives.

- Media literacy became an element of Finnish civic competence in the early 2010s. Following several cases where fake news on immigration, the European Union, and NATO membership was widely disseminated, the Finnish government recognised the need to increase the population's resilience to digital misinformation. It instituted a cross-sector approach to improve media literacy within Finnish society, with a particular focus on children. According to the chief communications officer for the Finnish Prime Minister's office, "*The first line of defence [against fake news] is the kindergarten teacher*"[71]. The Department for Media Education and Audiovisual Media[72] (MEKU) is legally tasked with promoting media education, youth media skills, and fostering a safe media environment for children.[73] At the same time, the NGO-run fact-checking service, Faktabaari, provides fact-checking and media literacy materials for schools.[74]

- *Media literacy in Finland* [75] is the media literacy policy and the national media education policy document published by the Ministry of Education and Culture in 2019. This followed the publication of the first national strategy, *Good Media Literacy; National Policy Guidelines 2013–2016.*[76] Media literacy in Finland in fact has a long history and goes back to mass media education which was widely promoted during the 1970s at basic education level and, prior to that, film education since 1958. The first Finnish PhD in media literacy was awarded in 2001[77] in Tampere University and since then there has been a flourishing academic tradition of research and scholarship in the area. The Finnish Society on Media Education (FSME) was founded to help in bridging the gap between researchers and professionals with a focus on practical activities.

- *Media Literacy in Finland* aims to promote media literacy, awareness, and empowerment nationally and for all people in Finland. The policy's main goal is that comprehensive, high-quality and systematic media education is carried out in Finland. The vision is that as a result of strong media education work in Finland, the opportunities for every person to develop their media literacy will improve. The guidelines present several proposed measures to support the achievement of the goals. The guidelines for media literacy in Finland aim to clarify the field of media education and describe the strengths, values and principles of Finnish media

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[70] https://kavi.fi/en/

[71] https://medialukutaitosuomessa.fi/mediaeducationpolicy.pdf

[72] http://www.meku.fi/

[73] National Audiovisual institute Finland (2016) *Finnish Media Education: Promoting Media and Information Literacy in Finland,* p 3.

74 https://faktabaari.fi/in-english/

[75] https://medialukutaitosuomessa.fi/en/category/medialukutaito/

[76] https://julkaisut.valtioneuvosto.fi/handle/10024/75280

[77] Kotilainen, S. (2001). *Mediakulttuurin haasteita opettajankoulutukselle*. (Acta Universitatis Tamperensis; No. 807). https://researchportal.tuni.fi/en/publications/mediakulttuurin-haasteita-opettajankoulutukselle-2

education. In addition, development targets and social, cultural and technological development trends affecting them are highlighted.

- The goal is that the opportunities for all people to develop their media literacy will improve in Finland. Broad media literacy that promotes a meaningful, good life is a civic skill that belongs to everyone. Media literacy is promoted and supported through high-quality, systematic and comprehensive media education. Practical media education activities are goal-oriented, ethical and sustainable. Multifaceted media education is planned, implemented and developed by many different parties in broad-based cooperation. High-quality media education aims to promote human rights and equality, and create conditions for sustainable development.

- *National Core Curriculum for Basic Education*[78] (22.12.2014); *Pre-Primary Education* (22.12.2014): This core curriculum for primary education is a national regulation issued by the Finnish National Board of Education, on which local curricula are drawn up. The national core curriculum contains the guidelines for the provision of education, and the objectives and critical contents of the instruction. The core curriculum also addresses the development of the school culture and cooperation, implementation of education, teaching and guidance, support for learning, pupil welfare, and assessment of learning. To support the work of the education providers, the core curriculum also contains references to the legislation that underpins the norms laid down in this document and the field of primary education, as well as guidelines for preparing the local curricula.

- General Upper Secondary Education[79] (7.11.2019) aims to increase the attractiveness of general upper secondary education as a form of education providing solid general knowledge and eligibility for further studies in higher education, enhance the quality of education and learning outcomes, and make the transition from upper secondary education to higher education smoother.

- Common units for Basic Vocational Education Curricula[80] (1.8.2018). The 2018 vocational education and training (VET) reform reflects its holistic approach to lifelong learning: initial and continuing VET have been reorganised under the same legislation, underpinned by common principles. Using a competence-based approach, it caters for young people, adults, employees with upskilling or reskilling needs, and the unemployed. The objective of this most extensive reform in almost 20 years was to make VET more efficient and better match qualifications.

- Early Childhood Education Act [81] (19.12.2018) lays down provisions on the rights of a child to early childhood education and care (ECEC). Early childhood education and care is provided as: 1) centre-based early education activities organised in early education centres; 2) family-based day care arranged in family day care premises; 3) open early childhood education and care activities organised in a suitable place.

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[78] https://www.oph.fi/en/education-and-qualifications/national-core-curriculum-basic-education
[79] https://www.oph.fi/en/education-system/general-upper-secondary-education
[80] https://www.cedefop.europa.eu/files/4176_en.pdf
[81] https://www.finlex.fi/en/laki/kaannokset/2018/en20180540.pdf

3. Measurement system

The collective impact framework emphasises the importance of a shared measurement system and agreement on the ways success is measured and reported with key indicators by all participating organisations. Applying this to the online safety and better internet policy domain, the following is a brief summary of the measurement systems in place and methods of evaluation and progress reporting that apply.

Ex-post evaluation and key indicators for progress and/or success

In Finland, implementation evaluations of the curricula for basic education and early childhood education are undertaken by the Finnish Education Evaluation Centre[82] (FINEEC). The Finnish Education Evaluation Centre also publishes basic education graduates' learning results evaluation on Finnish language and literacy in 2022. It is based on an external review conducted between June 2021 and February 2022.[83] This report results from an external review assessing the compliance of Finnish Education Evaluation Centre[84] (Kansallinen koulutuksen arviointikeskus, FINEEC) against the 2015 Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG). As it is already the third review of FINEEC, the review approach also reflects the developmental dimension and considers the impact of organisational changes that happened close to the last review. However, these evaluations discuss curricula in general and are not focused specifically on media literacy and ICT issues.

Data collection and consultations

Data collection on online safety and better internet policy topics is irregular. EU Kids Online has provided some of the most detailed statistics on online safety with reports in 2011, 2015 and 2020.

- Data collection to support policy making related to the BIK strategy in Finland includes national and regional surveys with quantitative data specifically focused on children's use of the internet, quantitative data on some topics of children's use of the internet collected as part of a broader survey, and qualitative research specifically focused on children's use of the internet.

- As part of the EU Kids Online 2020 study, the EU Kids Online Finland survey is a national survey of children funded by the National Audiovisual Institute.[85] The report maps the

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[82] https://karvi.fi/app/uploads/2019/09/KARVI_1519.pdf
[83] https://www.enqa.eu/wp-content/uploads/FINEEC-external-review-report.pdf
[84] https://www.enqa.eu/wp-content/uploads/FINEEC-external-review-report.pdf
[85] https://kavi.fi/en/

internet access, online practices, skills, online risks and opportunities for children aged 9-17.

- The School Health Promotion[86] in 2019 was a public-funded survey. The School Health Promotion (SHP) study monitors the well-being, health and schoolwork of Finnish children and adolescents. The aim of the SHP study is to strengthen the planning and evaluation of health promotion activities at school, municipal and national levels. It covered 85 per cent of children in the 4th and 5th grade, 75 per cent of children in the 8th and 9th grade, and 69 per cent of children in upper secondary schools.

- A total of 581 young people around the country were consulted (through interviews, etc.) during the preparation phase of the National development program for Youth Work and Youth Policy 2020-2023.[87] According to the Finnish Local Government Act, the local executive must set up a youth council representing young people's views. Youth councils must be given the opportunity to influence the planning, preparation, execution and monitoring of the activities of the municipality's different areas of responsibility and also in other matters that the youth council considers to be significant for children and young people. Youth councils must be involved in the municipality's work to develop children's and young people's participation and the opportunities for their views to be presented.

- In the 2020 BIK Policy Map, the involvement of young people in policy making was described as one whereby young people's interests are considered indirectly (for example, through analysis of existing surveys, or data collections).[88] Relevant organisations involved in supporting youth participation in policy making include: the Union of Upper Secondary School Students which is a member organisation of the Advisory Board[89] in the General Upper Secondary Education curriculum revision.

4. Mutually reinforcing activities

According to the collective impact framework, mutually reinforcing activities refer to engagement of a diverse set of stakeholders, typically in multiple sectors, coordinating a set of differentiated activities through a mutually reinforcing plan of action.

Coordination through joint plan of action of all parties/partners

In general, government ministries are in charge of the planning, guidance and implementation of the policies within their policy areas. However, practically all policies (as well as the implementation) are made in cooperation with relevant stakeholders and subordinate governmental authorities.

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[86] https://thl.fi/web/thlfi-en/research-and-development/research-and-projects/school-health-promotion-study
[87] http://urn.fi/URN:ISBN:978-952-263-887-8
[88] https://www.betterinternetforkids.eu/policy/bikmap
[89] https://lukio.fi/seravo-start/english/

- In Finland, policy design is led at ministerial level for all educational policies, tools and regulations for a safer environment, and in terms of legislation and law enforcement against child sexual abuse and exploitation. There is no single coordinating body and, in practice, a diverse range of organisations and stakeholders implement policies and deliver outcomes which align with BIK strategy.

- Government ministries develop legislation and provide funding including to NGOs and other agencies.

- The Finnish Safer Internet Centre (FISIC) is a joint project of three individual organisations: the National Audiovisual Institute (KAVI), Save the Children Finland (STC) and the Mannerheim League for Child Welfare (MLL). Each organisation has an established role in Finnish society and strong national and international relations. The main national supporter of the project is the Ministry of Culture and Education.

- Teaching ICT skills including online safety has been a part of all curricula from early childhood education (since 2016) to basic (since 2014) and upper secondary education (since 2015). More than one million euro were granted during 2019 by the Ministry of Education and Culture for projects promoting online safety and raising awareness about risks such as grooming and sexual harassment online.

- The new national media literacy policy was introduced by the Ministry of Education and Culture in 2019. In 2020, the Ministry of Education and Culture assigned its subordinate agencies, the National Audiovisual Institute and the National Agency for Education, to conduct a new national development programme, New Literacies (estimated budget three million euros in three years), to develop children and young people's media literacy and digital competencies.

- The Ministry of Education and Culture is responsible for policy development and funding related to early childhood education, schools, higher education, research, youth work, culture (including media literacy). The National Agency for Education oversees normative curricula and teaching development. The National Audiovisual Institute oversees the promotion of media education, children's media skills, and the development of a safer media environment (through the Finnish Safer Internet Centre which it also assists in coordinating).

- The Ministry of Social Affairs and Health oversees the planning, guidance and implementation of health and social policy (for example, preventing violence against children). The Ministry of Justice maintains and develops legal order and legal protection, and oversees the structures of democracy and the fundamental rights of citizens (such as hate speech prevention).

- The Ministry of the Interior's responsibilities include preparing legislation concerning the police. Its subordinate agencies include the National Bureau of Investigation (NBI), which deals with child sexual abuse material (CSAM) notice and takedown. The Finnish Competition and Consumer Authority (FCCA), subordinate to the Ministry of Economic Affairs and Employment (MEAE), is responsible for consumer protection.

- The National Audiovisual Institute facilitates discussions between different stakeholders regarding media literacy and internet safety including the Finnish Safer Internet

Centre. Save the Children Finland and The National Bureau of Investigation have direct connection regarding CSAM takedown.

5. Communication

Communication activities among all parties/partners

The collective impact approach suggests that consistent and open communication is needed across the many players to build trust, ensure mutual objectives, and create common motivation. Communication activities are seen as an important means of building public awareness and commitment to the goals of the initiative and the objectives for social change. As with other aspects of the framework, this is not always directly applicable to online safety as a policy issue – particularly given its basis as a governmental legislative initiative – though as set out in the preceding sections, some elements are relevant.

- The policy on Media Literacy in Finland (2019) led by the Ministry of Education and Culture aims to promote media literacy and digital skills for all people in Finland. The policy was developed through wide cooperation with different stakeholders and addresses both general policies (such as curricula starting from early childhood education) and policy specific to media literacy.

- Media literacy policy has also been produced as part of a cross-administrative media policy programme. The National Audiovisual Institute (KAVI) prepared the policies in cooperation with the ministry and actors in the field of media education. An online survey on the current state and future of media education, results from media education planning workshops organised in seven different cities, and expert interviews were used in the preparation of the guidelines.[90]

- The Finnish Media Education Authority (KAVI), an agency of the Finnish Ministry of Education and Culture, is legally responsible for promoting media education, children's media skills and the development of a safe media environment for children. KAVI actively participates in international collaboration and represents Finland in the European Commission Media Literacy Expert Group and the Expert Group on Safer Internet for Children. Since 2012, KAVI has organised the annual Media Education Forum event that supports networking between the different actors and the development of the sector. KAVI's Media Literacy School is a portal for educators with information and exercises that support media education activities in schools, libraries, youth centres, and so on. All resources are free of charge, and many of them are available in English. KAVI also implements and actively develops film education as part of the promotion of audiovisual culture. The implementation of the media literacy policy will be regularly studied and evaluated by KAVI in collaboration with stakeholders and the Ministry of Education and Culture.

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[90] https://kavi.fi/en/

- The National Youth Work and Youth Policy Programme 2020-2023[91] indicates that "*coordinating ways to prevent child and youth grooming on social media*" is one of its main objectives. To this end, the Ministry of Education and Culture coordinates the actions of an inter-ministerial collaborative project which will be set up in co-operation with Ministry of the Interior, Ministry of Social Affairs and Health, the Finnish National Agency for Education and NGOs. The results of this collaboration will be reported in forthcoming years. However, at the same time, it can be said that the Finnish policy approach is not focused on raising awareness of the risks as such, but rather by strengthening all the positive media skills of young people.

- The Finish Safer Internet Centre focuses on media literacy, online safety, digital skills and the takedown of child sexual abuse material (CSAM) in cooperation with different government agencies and stakeholders. The Finnish Safer Internet Centre exists to promote a safer and better use of the internet and mobile technologies among children and young people. Media literacy week is part of the Finnish Safer Internet Centre project coordinated by KAVI and co-funded by the European Commission. The FISIC works with a well-established multi-stakeholder network, involving the public sector, private sector and civil society to help make the internet a trusted environment through actions that empower and protect users online.

Good practices

The following are selected examples of good practices in supporting children's use of the internet in Finland:

- *Self-help programme.* Save the Children Finland has, in co-operation with the Criminal Sanctions Agency and the Hospital District of Helsinki and Uusimaa (HUS), created a self-help programme otanvastuun.fi [92](I take responsibility) for adolescents and adults who are concerned about their sexual interest in children. The programme was published in January 2018 and can be used anonymously and free of charge. It is available on Mental Hub (mielenterveystalo.fi), which has approximately 80,000-90,000 users per month and is maintained by HUS. Mental Hub already has different self-help materials, for example on coping with depression and anxiety.

- The *Erasmus+ KA201 project AMeLiE*[93] (Advanced Media Literacy Education to counter online hate-speech) deals with the phenomenon of hate speech on the internet – a topic that is increasingly being discussed in public debate. The aim of the project is to sensitise schools, for example, teachers, pupils and their parents, to the presence of hate speech online and to provide them with useful methods, materials and tools to specifically counteract hate speech. The aim is to promote respectful and tolerant interaction with others, online and offline.

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[91] http://julkaisut.valtioneuvosto.fi/handle/10024/162381
[92] https://www.otanvastuun.fi
[93] https://www.amelieproject.eu/be-kind-amelie-project-to-counter-online-hate-speech-was-kicked-off/

- One of the main awareness-raising efforts of the Finnish Safer Internet Centre is the annual *Media Literacy Week* [94](MLW) which includes the Safer Internet Day (SID) campaign. The MLW is planned and carried out together with over 40 partners and the actions are implemented in various educational institutions. The aim of the initiative is to advance media literacy skills, as well as to support professional educators, guardians and other adults in their important media educational tasks. In 2019, Media Literacy Week was organised as a series of 30 different materials and campaigns created together by 55 partner organisations from all sectors of society. Media Literacy Week is part of the Finnish Safer Internet Centre project coordinated by KAVI and co-funded by the European Commission. Another major awareness-raising campaign which is part of the project is Finnish Game Week. Game Week comprises of hundreds of individual events organised around Finland. FISIC also coordinates the Nordic Game Day in an effort to promote game literacy through hundreds of local events each November. In addition, the awareness centre organises an annual Media Education Forum supporting national cross-sectoral co-operation and partnerships.

- The *Finnish Hotline* [95](Nettivihje) has produced awareness-training material for social workers and professionals working with children. The guidebook, *Broach the subject – the internet and sexual abuse of children*, provides advice on how to improve children's safety and prevent sexual abuse on the internet, and how to support children in difficult situations. There is also video material for youth covering topics such as expressing one's emotions and sexuality on the internet, and protecting oneself from harmful online behaviour.

- The University of Lapland's Media Education Hub[96] (MEH) is a unit for education and research with fifteen years of experience of carrying out interdisciplinary research projects and developing educational models for different contexts. The Hub also coordinates, for example, the Ikaihme-project (2018-2020) funded by the Ministry of Education and Culture that aims to develop teacher education of adult educators – targeting older people's media education.

- The University of Tampere and University of Lapland both provide a two-year Master's programme in media education. The University of Lapland also delivers international Master's degree studies in media education. In a two-year English-taught Master's degree programme, the students will build expertise in three major themes: media in teaching and learning, media in society, and media and psychosocial well-being.

6. Backbone organisation

According to the framework, creating and managing collective impact requires a separate organisation or organisations with staff and a specific set of skills to serve as the backbone for

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[94] https://www.mediataitokoulu.fi/index.php?option=com_content&view=article&id=1139&Itemid=454&lang=fi

[95] https://www.pelastakaalapset.fi/en/child-protection-and-finnish-hotline/

[96] https://www.ulapland.fi/EN/Units/Media-Education-Hub

the entire initiative and coordinate participating organisations and agencies. Policy coordination has been an important theme in successive iterations of the BIK Policy Map. Many instances reported of a lack of or inconsistent coordination at the country level which hampers the effective delivery of programmes. The topic of policy coordination is especially relevant in this context where effective cooperation mechanisms are needed with strong backbone support to ensure the delivery of programme and policy objectives.

Media literacy gained traction as an element of Finnish civic competence in the early 2010s. Following fake news campaigns focussing on immigration, the European Union, and NATO membership, the Finnish government recognised the need to increase the population's resilience to digital misinformation. The Department for Media Education and Audiovisual Media (MEKU) is legally tasked with promoting media education, youth media skills, and fostering a safe media environment for children,[97] while NGO-run fact-checking service, Faktabaari, provides fact-checking and media literacy materials for schools.[98]

The media literacy policy in Finland also promotes actions in non-formal and informal learning. The National Audiovisual Institute KAVI's Department for Media Education,[99] established in early 2012, is the only agency with a statutory duty to promote media education in Finland and Audiovisual Media (MEKU) is responsible for the promotion and coordination of media education at a national level, and the supervision of the provision of audiovisual programmes from the perspective of protecting children.

The Finnish Society on Media Education[100] is the leading organisation among NGOs in the media education field. It aims to support and develop the field of research and practices concerning media literacy education, contribute to the public debate and provide opportunities to share media education experiences online and offline nationally and globally. Their functions include the organisation of events, updating an informative website in three languages (also in English), and co-operating in national and international networks. It also releases information on social media channels (Facebook, Twitter, YouTube and SlideShare) to its followers. The Finnish Society on Media Education is a member of the UN-Alliance of Civilizations Media Literacy Education Clearinghouse[101] and works in cooperation with International Clearinghouse on Children, Youth and Media. Its work is supported by the Ministry of Education and Culture[102] and by its members.

As recognised in Finland's media literacy strategy, there are a multitude of active associations in the child and youth sector that focus on media education in promoting the well-being of children and adolescents. Examples of these organisations include the Mannerheim League for Child Welfare,[103] Save the Children Finland,[104] the Finnish Parents' League,[105] and the Finnish 4H Organisation. The strategy also highlights the work done by the

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[97] National Audiovisual institute Finland (2016) *Finnish Media Education: Promoting Media and Information Literacy in Finland,* p 3.
[98] https://faktabaari.fi/in-english/
[99] https://kavi.fi/en/media-education/
[100] https://mediakasvatus.fi/in-english/
[101] https://www.freetech4teachers.com/2009/08/alliance-of-civilizations-media.html
[102] https://okm.fi/en/frontpage
[103] https://www.mll.fi/en/
[104] https://www.pelastakaalapset.fi/en/about-us/who-we-are/save-the-children/
[105] https://vanhempainliitto.fi/tietoa-liitosta/welcome-to-parental-activity/

youth work centres of expertise.[106] From the perspective of media education, some of the key centres of expertise at a national level in the 2010s were (and still are) the Centre of Expertise for Digital Youth Work in Finland including Verke,[107] and Koordinaatti.[108] These centres of expertise for youth services are financed by the Ministry of Education and Culture to develop and promote competence, expertise, and the flow of information regarding youth services as set out by the Youth Act.[109]

The Finnish Safer Internet Centre (FISIC) is also a key backbone organisation in this context. FISIC is a joint project of three individual organisations: the National Audiovisual Institute (KAVI), Save the Children Finland (STC) and the Mannerheim League for Child Welfare (MLL). Each organisation has an established role in Finnish society, and strong national and international relations. The main national supporter of the project is the Ministry of Culture and Education.

The Finnish National Agency for Education[110] has an important role in promoting media education in formal education. It prepares and makes decisions about the core curricula for basic education and upper secondary education, the core curriculum for early childhood education and care, and bases for vocational and competence-based qualifications. Both agencies operate under the Ministry of Education and Culture. Other ministries which contribute to this initiative include the Ministry of Justice which promotes media literacy as a part of democracy education, the Ministry of Transport and Communications, and the Finnish Transport and Communication Agency which also co-operates in organising, for example, campaigns such as the Media Literacy Week and offer expertise on the safe use of the internet.

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[106] https://okm.fi/en/national-youth-centres
[107] https://www.verke.org/en/verke/
[108] https://koordinaatti.fi/en
[109] https://okm.fi/en/legislation-youth
[110] https://www.oph.fi/en

Better **I**nternet for **K**ids

Annex 3: Malta case study

1. Introduction

Malta is the smallest of the European Union's 27 Member States both in terms of population and area.[111] It is also the Member State which records by far the highest population density (with almost 1,400 inhabitants per km²) and the highest tourism intensity in the EU. With a total population of just over 0.5 million, about 14.42 per cent of population is aged 0 to 14 years.

Although it is one of the EU's smallest economies, Malta is the third fastest growing economy in the European Union. It is also one of the most resilient, resulting from a decades-long strategy of ensuring a wide spread of activities within the economic sector so as to minimise negative exposure to outside economic developments.[112] The ICT sector has grown to represent 6.6 per cent of the GVA (Gross Value Added) generated by the Maltese economy in 2017, an increase of 5.8 per cent over the previous year. Currently the sector comprises more than 300 companies, employing over 7,300 persons. The importance of the sector to the Maltese economy is reflected in government investment in human resources backed up by a strong nation-wide infrastructure with three main service providers, as well as multiple cable connections to the European mainland.

This case study explores the origins, the organisational foundations and the concrete procedures of young people's representation in Malta's policy making, with a focus on children's participation during the whole policy cycle regarding BIK-related policies.

Key findings from EU Kids Online 2020

According to the most recent EU Kids Online survey,[113] smartphone use among children is high, with about half of all children aged between 9 and 10 accessing the internet through a mobile phone. For children aged between 15 and 16, this increases to 9 out of every 10. The two most common online activities for all participants are watching video clips (79 per cent) and listening to music (72 per cent). Regarding risks, one in every four children reported receiving sexually explicit messages and one in five received requests of a sexual nature. Of those aged 15 to 16, 70 per cent have seen sexual content in the last year. Younger children (24 per cent of 9 to 10-year-olds and 34 per cent of 11 to 12-year-olds) were very upset by these images; 21 per cent of children aged between 9 and 16 did not speak to anybody about an online experience that had disturbed them. Friends (39 per cent) and parents (42 per cent) were the main sources of support in cases when they did seek help. The percentage of children who did nothing when facing such problems remains high, with 33

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[111] https://ec.europa.eu/eurostat/cache/countryfacts/

[112] National Statistics Office, https://nso.gov.mt/en/News_Releases/View_by_Unit/Unit_A1/National_Accounts/Pages/Gross-Domestic-Product.aspx

[113] Smahel, D., Machackova, H., Mascheroni, G., Dedkova, L., Staksrud, E., Ólafsson, K., Livingstone, S., & Hasebrink, U. (2020). *EU Kids Online 2020: Survey results from 19 countries* (pp. 156–156). http://www.lse.ac.uk/media-and-communications/assets/documents/research/eu-kids-online/reports/EU-Kids-Online-2020-10Feb2020.pdf

per cent ignoring the problem or hoping that it would go away, and 30 per cent closing the website or app.

89 per cent said that they use the internet every day at home while only five per cent of 15 to 16-year-olds use the internet at school. This may reflect less openness to technology in the classroom. Internet use at school is higher among students between the ages of 9 and 10 (13 per cent). 35 per cent of children aged 9 to 16 made contact with people online they had never met offline. Around half of these children met in real life the people they had come to know online.

The country's small size is possibly one reason so many children could meet up with somebody they met online. The majority of those who decided to meet these online acquaintances in real life were happy to have done so; however, six per cent were uncomfortable with this (EU Kids Online, 2020).

2. Common agenda

According to the collective impact framework, a common agenda refers to a shared vision among all participants for change including a common understanding of the problem and a joint approach to solving it through agreed-upon actions.[114]

- The *National Children's Policy 2017*[115] was the first national policy to reflect the government's commitment to recognise, respect and promote children's rights and their overall well-being. The policy outlines the vision that children are encouraged and supported to reach their maximum potential. In line with the United Nations Convention on the Rights of the Child (UNCRC), the national policy seeks to promote the well-being, best interests and empowerment of all children through the protection of their rights and freedoms, the provision of high-quality services, and their active participation across all sectors of society, to enhance their present and future prospects.

- In Malta, children's participation in a diversity of national activities is supported. This includes, for example, young people's representation in the Civil Society Committee of the Malta Council for Economic and Social Development (MCESD). The MCESD functions as an advisory council that forms opinions and issues recommendations to the Maltese government on economic and social relevance matters. Malta's *National Youth Policy Towards 2020*[116] strategy specifically aims at increasing young people's political participation.

- The development of youth policy in Malta has its origins in the preparation for the publication of the first youth policy in 1993. Since then, Malta has undergone major

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[114] Kania, J., & Kramer, M. (2011). Collective Impact. Stanford Social Innovation Review, Winter, 36–41.
[115] https://education.gov.mt/en/resources/Documents/Policy per cent20Documents/Draft.pdf
[116] https://education.gov.mt/en/resources/Documents/Policy per cent20Documents/National_Youth_Policy_Towards_2020.pdf

changes, including accession to the European Union in 2004. Malta's first National Youth Policy (1993) and the subsequent 1998 policy document sought to provide young people and policy makers with clear objectives for the nation's political, social and economic development. The relevant ministry had the responsibility for implementing the policy with the support of the National Youth Council and national and local voluntary youth organisations. The National Youth Policy (2004), which followed a Council of Europe National Report on Malta conducted by an international group of experts, continued with the themes and concerns of the previous policies. It aimed to ensure social justice, opportunity and equity, promote the authenticity of the identity, diversity and responsible independence of young people, as well as promoting active citizenship and participation. The most significant feature of the 2004 policy was its reference to the need for a national youth agency.

- The National Youth Policy (2010-2013) had a number of significant features. First, it was based on extensive consultation with all the relevant stakeholders. Second, it established an instrument for policy coordination and implementation, *Aġenzija Żgħażagħ*,[117] the National Youth Agency. Third, it emerged against the background of a new policy initiative at the European Union level, the renewed framework for European cooperation in the youth field (2010-2018). It was the first policy approach to embed youth policy in the context of the UNCRC and European policy documents (National Youth Policy towards 2020, 2015).

3. Measurement system

The collective impact framework emphasises the importance of a shared measurement system and agreement on the ways success is measured and reported with key indicators by all participating organisations. Applying this to the online safety and better internet domain, the following is a brief summary of the measurement systems in place and methods of evaluation and progress reporting that apply.

Ex-post evaluation and key indicators for progress and/or success

The involvement of young people in policy making is described as one whereby young people are systematically and directly consulted and informed (for example, through analysis of existing surveys or data collections). In Malta, one of the main responsibilities of the BeSmartOnline! project[118] operated by the Office of the Commissioner for Children, is youth participation. The Office of the Commissioner for Children established the Council for Children which has an advisory role, and young individuals act as ambassadors and form the link between youth and policy makers. Furthermore, a fixed youth panel is always consulted in resource development and campaign ideas. Various outreach sessions are also held so as to include the opinions and experiences of children who are not usually empowered to

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[117] https://youth.gov.mt/
[118] https://www.besmartonline.org.mt/

participate in such fora. Additionally, recommendations are frequently drawn up by young people and presented to policy makers. There was, for example, a significant contribution by youth to the formulation of the National Children's Policy in 2017.

The National Children's Policy is continuously evaluated. The Office of the Commissioner for Children has been tasked with monitoring the implementation of the policy and, prior to issuing the first interim report in 2020, 25 workshops were held with children in various church, state and independent schools with children between the ages of 7 and 15 so as to include their recommendations on children's rights in general. A further 25 workshops were held in the same schools particularly on children's rights in the digital environment. These recommendations were also included in the interim report published by the Office of the Commissioner for Children.

The National Children's Policy refers to measures related to producing, possessing and disseminating child sexual abuse material (CSAM). It stresses the importance of strengthening efforts to eliminate such material through increased law enforcement and public reporting. In response to such recommendations, Malta has strived to build a stronger and more harmonised mechanism between the Foundation for Social Welfare Services and the Malta Police Force Cyber Crime Unit when it comes to dealing with reports. Evaluation of the policy is still ongoing.

Data collection and consultations

Data collection on online safety and better internet policy topics is irregular. EU Kids Online has provided some of the most detailed statistics on online safety with reports in 2011, 2015 and 2020. Malta does not have one data collection point for BIK-related issues. Various BIK-related issues are however collected in various irregular data collection exercises.

- As part of the EU Kids Online 2020 study, the University of Malta, in collaboration with the BeSmartOnline! consortium (Tech.mt, Office of the Commissioner for Children, Foundation for Social Welfare Services, Directorate for Learning and Assessment Programs, and the Cybercrime Unit) undertook research in 2018 on internet opportunities and risks for Maltese children. In Malta the survey was carried out with a representative sample of 1,234 boys and girls aged 9-16.[119]

- The 2020 consultation "*TOWARDS 2030 Reviewing the draft national youth policy: Reaching out to, working with and supporting young people*" covers the period 2021 to 2030 and focuses on all young people aged 13 to 30. The initiative aims at building on the success of the past five years while focusing on the challenges and opportunities that lie ahead. Before its implementation, like any other policy issued, the Maltese government published the draft youth policy for public consultation on its online platform.

- "Aġenzija Żgħażagħ" (National Youth Agency of Malta) involved young people in this consultation process through the use of eParticipation. The Parliamentary Secretary for

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[119] https://tech.mt/media/project/besmartonline/

Youth entrusted "Aġenzija Żgħażagħ" and the National Youth Council to devise a strategy to engage young people in this consultation process. However, text reviewing a policy is an arduous task for anyone. "Aġenzija Żgħażagħ" opted to use the OPIN.me eParticipation platform[120] to facilitate this process. The aim was to invite young people to provide feedback, recommendations and changes on the six strategic goals proposed in the national youth policy. The text reviewing tool on OPIN was the ideal tool to carry out this process. Youth workers from "Agenzija Zghazagh" initiated a project for each respective strategic goal. Over a month, youth workers and representatives from the National Youth Council invited young people on OPIN to share their views. Young people actively engaged in commenting and proposing new ideas and suggesting changes. In some cases, participants reacted and commented on other participants posts. To complement the online participation in collaboration with KNZ, "Aġenzija Żgħażagħ" hosted focus groups for young people to explore the six strategic goals further. This exercise was useful as it created collaborative efforts that led to multiple suggestions, recommendations and text reviews.

- By the end of October 2021 several young people had participated actively in the process, generating over 150 comments. A document with the comments, text reviews and suggestions was put together and presented to the Parliamentary Secretary responsible for the youth sector and other policy makers in Malta. "Agenzija Zghazagh" intends to continue using eParticipation and OPIN.me to engage young people in the implementation phases of the new youth policy.

- *Democratic participation listening to the voices of young people (2015)* [121]: As part of the programme for greater democratic participation and inclusive change, Malta's government has undertaken to amend the electoral legislation to give the opportunity to young people aged 16 and 17 to vote for the first time in the local elections held in March 2015. This survey was conducted online and provided an understanding of young people's attitudes to electoral change and political participation. The survey results tend to corroborate other recent research findings: young people in Malta are generally thoughtful, measured as well as forward-looking, and responsible in their political attitudes and responses. The survey also highlights the fact that transitions between childhood and adulthood can often be complex and applying common attitudes and norms to all young people and all age groups is not necessarily conducive to better understanding. In 2018, Malta was the second country in Europe, after Austria, to grant the vote to 16-year-olds in national elections122.

- *National Youth Policy Towards 2020 A shared vision for the future of young people (2015).* [123] The Government has several policy initiatives to strengthen the delivery of effective services and ensure quality outcomes for all. The purpose of these policy

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[120] https://opin.me/en/
[121] https://youth.gov.mt/wp-content/uploads/2020/04/Democratic_Participation_-_listening_to_the_voice_of_young_people-compressed.pdf
[122] https://electoral.gov.mt/faqs
[123] https://education.gov.mt/en/resources/Documents/Policy per cent20Documents/National_Youth_Policy_Towards_2020.pdf

initiatives is to put in place clear policy aims and objectives, with accompanying actions that are specific, measurable, achievable, realistic and time bound, and which will result in quality outputs and outcomes. The National Youth Policy – Towards 2020, which covers the period 2015-2020, and is aimed at supporting young people in the 13 to 30 age group, is another of these policy initiatives.

- *New policy development regarding children's use of the internet*, including new topics and issues: The National Children's Policy (2017) addressed the issue of children's use of the internet and calls for the strengthening of initiatives in order to equip children with the necessary skills to think critically when using the internet. It also addressed the issues of child sexual abuse material (CSAM) and promoted an online-offline balance to prevent problematic internet use.

4. Mutually reinforcing activities

According to the collective impact framework, mutually reinforcing activities refer to the engagement of a diverse set of stakeholders, typically in multiple sectors, coordinating a set of differentiated activities through a mutually reinforcing plan of action.

Coordination through joint plan of action of all parties/partners

- In Malta, policy design is led at the ministerial level for all educational policies, tools and regulations for a safer environment and in terms of legislation and law enforcement against child sexual abuse and exploitation. There is no single coordinating body. In practice, a diverse range of organisations and stakeholders implement policies and deliver outcomes that align with the BIK strategy, even if this is not done purposely.

- According to the BIK Policy Map study, in Malta more than one ministry, agency or body is responsible for coordinating policies addressing the BIK strategy, with four to six ministries involved in the process.[124] There are several important stakeholders, such as the Foundation for Social Welfare Services, the Office of the Commissioner for Children, the Directorate for Learning and Assessment Programmes, and the Cyber Crime Unit within the Malta Police Force, which play an important role in the policy-making processes of policies for a better internet for children. All entities contribute by means of reports, studies, projects and evaluations that feed into the formulation of policies. The Office of the Commissioner for Children also makes various recommendations to the government and other relevant stakeholders in this regard. It also plays an important role in implementing and monitoring such policies.

- The Foundation for Social Welfare Services is the lead partner of the Safer Internet Centre with responsibility for stepping up awareness and empowerment of young

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[124] https://www.betterinternetforkids.eu/documents/167024/6823249/Malta+-+BIK+Policy+Map+Infosheet+-+FINAL.pdf/1dbe9403-f12a-9560-d5a3-d27aa5e8ee9b?t=1622798026489

people, which takes the initiative to use both national and EU funds to organise awareness activities and campaigns. Such activities and campaigns are generally created in collaboration with other public agencies, such as educational institutions and industry players.

- Malta also participates in exchange activities at the international and European level on issues related to children's use of the internet. These include Malta's Safer Internet Centre which forms part of the INHOPE Foundation and the Insafe cooperation network, and works closely with other partners to share best practice, information and resources. Malta's Safer Internet Centre also forms part of the Safer Internet for Children Expert Group whose main objectives are to exchange good practices and promote dialogue among Member States, and to encourage coordination and synergies between national and EU policies.

5. Communication

Communication activities among all parties/partners

The collective impact approach suggests that consistent and open communication is needed across the many players to build trust, ensure mutual objectives, and create common motivation. Communication activities are seen as an important means of building public awareness and commitment to the goals of the initiative and the objectives for social change. As with other aspects of the framework, this is not always directly applicable to online safety as a policy issue – particularly given its basis as a governmental legislative initiative – though as set out in the preceding sections, some elements are relevant.

During a session of the National Youth Parliament, Maltese Prime Minister Robert Abela sent a message to young people stating that youth should lead the discussion on major reforms Malta faces, such as climate change, mass transport and the electoral system. Referring to the government's post-COVID strategy, the Prime Minister said that this strategy was designed with the contribution of so many young people. He also stressed the importance of advancing digitalisation in all aspects of public life and encouraged young people to participate fully in electoral systems. In fact, numerous reforms carried out over the past two years, from the appointment of the judiciary, the Chief Justice and the President of the Republic, were implemented with the strong involvement of young people. The Prime Minister emphasised that "*youth should lead the discussion and come up with the right way forward*" towards the electoral system.

- Mechanisms to facilitate inter-departmental communication or inter-agency cooperation regarding children's use of the internet include the *BeSmartOnline!* project which brings together the Foundation for Social Welfare Services, the Office of the Commissioner for Children, the Directorate for Learning and Assessment Programmes (DLAP), and the Malta Police Force – Cyber Crime Unit. All partners work together to raise awareness and educate children and teens, parents/carers and educators on the safer use of the internet. All partners meet up on a frequent basis

and ensure that a strong relationship is established between them. The
BeSmartOnline! Advisory Board also plays an important role in this policy coordination
and communication.

- The Office of the Commissioner for Children[125] was established in 2003 in order to
promote children's welfare and comply with the United Nations Convention on the
Rights of the Child (UNCRC), as ratified by Malta on 26 January 1990. The work of the
office focuses on the protection of children, the promotion of children's rights, and
ensuring that children have the necessary services for them, as well as their
participation especially in issues that impact them directly. The office works by being
a point of reference that carefully follows the social and cultural situation where
children are concerned, to help substantially in the coordination of work necessary in
different areas so that it is focused primarily on the needs of children.

- Malta's Foundation for Social Welfare Services[126] was established in 1998. Its aims are
to provide social welfare services, to develop and promote social and other related
studies and scholarships, and to collaborate with similar entities, at regional and
international levels. The Foundation is governed by a board of members who
contribute through their experience in the field of social welfare practice and
research.

- The Cyber Crime Unit127 is a specialised section within the Malta Police Force, set up
in 2003. Its primary role is to provide technical assistance in detecting and
investigating crime where the computer is the target or the means used. The Cyber
Crime Unit is made up of police officers who are trained in the investigation of crimes
that take place over the internet or through the use of a computer. The Cyber Crime
Unit's involvement is not limited to criminal acts commonly associated with
technology itself – such as hacking – but extends to investigations of more traditional
offences such as fraud, threats and other serious crimes. Indeed, the Cyber Crime
Unit's assistance is sought regularly in order to preserve information found on internet
websites, during searches carried out by police officers from a number of different
sections of the Police Force, in the analysis of digital evidence seized in connection
with investigations, as well as in identifying persons who are committing crimes over
the internet.

- The Directorate for Learning and Assessment Programmes (DLAP) oversees the
Personal, Social and Career Development (PSCD) programme, enabling children and
youth to become healthy, independent and responsible members of society. Among
other things, PSCD aims to:

- Help students understand their identity, rights and social responsibilities within the local
and international community.

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[125] https://tfal.gov.mt/?lang=en
[126] htps://fsws.gov.mt/en/Pages/default.aspx
[127] https://pulizija.gov.mt/en/police-force/police-sections/Pages/Cyber-Crime-Unit.aspx

- Provide learners with opportunities to develop good communication skills, build healthy relationships, and reflect on their choices and decisions concerning their health and sexuality, drugs, and the environment.

All these aspects relate to the use of new technologies by children and youth. Therefore PSCD provides opportunities for them to learn, achieve and develop emotional literacy, self-confidence, self-worth and self-esteem. The subject also allows learners to develop the necessary skills, knowledge and understanding to live a healthy, safe, productive and responsible life, both online and offline.

Sharing best practices

- Memorandum of Understanding with the national hotline. For the harmonisation of measures related to child sexual abuse online, the Maltese Cybercrime Unit has a Memorandum of Understanding (MoU) with the national hotline run by the Foundation for Social Welfare Services. The memorandum enables hotline analysts to pursue their work within a legal framework. Through the use of the hotline, reports are received that the general public may not feel at ease reporting to the police, thus more people are reached. The hotline passes all illegal content to the Maltese Cybercrime Unit which maintains a "stop list" of known child abuse websites.

- Online safety curriculum: Online safety forms part of the national syllabi for the Personal, Social and Career Development (PSCD) of primary and secondary students. The learning objectives related to internet use and safety within the syllabus have been strengthened and given more impetus through collaboration with the *BeSmartOnline!* consortium.

- Dance roadshow: Educational outreach is achieved through various initiatives, particularly a schools' roadshow, which disseminated key messages on the safe use of the internet through dance. This collaboration with Malta's national dance company, reaching over 1,000 students, covered themes including digital footprints and digital identity, online grooming, and cyberbullying.

- Company roadshow: To reach parents and to create awareness about how they can empower their children to be safe online, an ongoing company roadshow is carried out. Members of the Safer Internet Centre visit parents at their place of work and carry out sessions addressing various online risks.

- 'My journey' project: The Ministry for Education and Employment (MEDE) is launching 'My journey: achieving through different paths', a secondary school reform aiming to tackle early school leaving further, and to provide a system for all learners by addressing their different learning aptitudes, intelligence and patterns. The comprehensive and inclusive reform was introduced in the first year of secondary schooling (year 9, age 13) during the 2019-20 academic year.

6. Backbone organisation

According to the collective impact framework, creating and managing collective impact requires a separate organisation or organisations with staff and a specific set of skills to serve

as the backbone for the entire initiative and coordinate participating organisations and agencies. Policy coordination has been an important theme in successive iterations of the BIK Policy Map. Many instances reported of a lack of or inconsistent coordination at the country level which hampers the effective delivery of programmes. The availability of a supporting backbone organisation is especially important in the development of an integrated policy framework, given the need to manage the diverse perspectives and inputs of different stakeholder groups.

In Malta, as of 2020, children's use of the internet falls under the core responsibility of the Ministry for Finance and the Parliamentary Secretariat for Financial Services and Digital Economy. However, due to its transversal nature, different ministries are responsible for individual policy fields that affect children's online use. Relevant ministries include the Ministry for the Family, Children's Rights and Social Solidarity which is responsible for ensuring children's rights are safeguarded in the digital realm; the Ministry for Education and Employment which is responsible for producing educational curricula that address children's use of the internet; and the Ministry for Home Affairs, National Security and Law Enforcement which is responsible for the security aspect of children's use of the internet.

There are a number of other important stakeholders such as the Foundation for Social Welfare Services, the Office of the Commissioner for Children, the Directorate for Learning and Assessment Programs, and the Cyber Crime Unit within the Malta Police Force which all play an important role in the policy-making processes of policies for a better internet for children. All entities contribute by means of reports, studies, projects and evaluations that feed into the formulation of policies that address BIK-related issues. All stakeholders also play an important role in implementing and monitoring such policies.

The Malta Council for Science and Technology (MCST), acting for and on behalf of the Foundation for Science and Technology, is a public body established by the central government in 1988 to advise the government on science and technology policy. Today its remit has developed and expanded to include:

- Responsibility for the National Research and Innovation Strategy 2020 and related Action Plan.

- Responsibility for policy recommendations in the area of science and technology as well a representation of the Government of Malta in EU fora such as the European Research Area Committee (ERAC), the European Strategy Forum on Research Infrastructures (ESFRI), the European Institute of Technology (EIT), the High-Level Space Working Party, and other relevant bodies.

- Managing and administering the national and EU Research and Innovation Funding Programmes.

- The setting up of the first National Interactive Science Centre, science communication and science popularisation.

The Council is also responsible for supporting entities, being academic institutions or enterprises, to join foreign consortia to undertake large-scale multi-national research activities. Typically, such projects would have public-private partnerships set up at a European level to address strategic areas where research and innovation are essential to

European competitiveness. The Council also enters into bilateral agreements with other countries.

Annex 4: Germany case study

1. Introduction

As governance measures regarding BIK topics rely on the acceptance of all stakeholders involved for maximum effectivity, online child safety is an area where the involvement of different stakeholders, both in terms of participation in the policy-making cycle and in the implementation of activities under the separate pillars of BIK is of high importance. The involvement of stakeholders is taken to be an expression of the shared responsibility underpinning the BIK strategy and includes public and private sectors, civil society, parents, and children. Some of the indicators included in the BIK Policy Map tool hence refer to the type of stakeholder involvement, specifically with regard to IT and media companies.

In the third BIK Policy Map report, many countries had been in the process of implementing the provisions from Article 28d AVMSD, introducing new child protection-related obligations for video-sharing platform providers. Meanwhile, in autumn 2022, most Member States formally notified their legal implementations of Article 28d AVMSD (except for Ireland). One Member State that introduced additional duties of care for relevant user-generated content platforms (with more than one million users) including a new supervisory body that aims at applying a dialogic process ("dialogisches Verfahren") in the context of its supervisory activities is Germany. Against this background, Germany has been selected for an in-depth case study specifically looking into the forms of involvement of user-generated content platforms in applying the new legal provisions requiring them to implement precautionary measures.

In this case study, the main features of Germany's approach to online safety and better internet policies with a focus on user-generated content platforms are examined through the lens of the collective impact framework. Particular attention is given to identifying relevant aspects of the involvement of the relevant stakeholders in the governance process.

2. Common agenda

According to the collective impact framework, a common agenda refers to a shared vision among all participants for change including a common understanding of the problem and a joint approach to solving it through agreed-upon actions.[128]

Common understanding of the problem

In Germany, as in most other Member States, it has been observed since the rise of social media services that both the services provided and the media use of minors is changing to a significant degree, resulting in structurally new categories of online risks due to the dynamic

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[128] Kania, J., & Kramer, M. (2011). Collective Impact. *Stanford Social Innovation Review, Winter*, 36–41.

and interactive forms of services. Against this background, the reformed JuSchG (Jugendschutzgesetz, Youth Protection Act) has extended its objectives, now including "*the protection of the personal integrity of children and young people when using media*". By this extension, the federal lawmaker aims specifically at countering new risks that are based on communication and interaction, especially cyberbullying, cybergrooming and hate speech. Regarding user-generated platform providers, the new § 24a JuSchG states that "*service providers who store or provide third-party information to users […] must take appropriate and effective structural precautionary measures to ensure that the protection objectives […] are respected*". The provision then names potential measures to comply with the provision, among other things, notification and redress procedures for user complaints regarding harmful content, notification and redress schemes with user guidance suitable for children and young people for reporting impairments to their personal integrity through user-generated information, classification systems for user-generated audiovisual content, technical means of age verification, easy-to-find reference to provider-independent advice, help and reporting options, parental controls, and children-related safety by design measures.

Tasked with the supervision of the implementation of these precautionary measures is the BzKJ (Bundeszentrale für Kinder- und Jugendmedienschutz, Federal Agency for the Protection of Children and Young Persons in the Media). The BzKJ is formed out of the Federal Review Board for Media Harmful to Minors as an independent higher federal authority, subordinate to the Federal Youth Ministry. It has been given the competence to "*review the implementation, the specific design and the appropriateness of the precautionary measures to be taken by service providers*", where "jugendschutz.net" (Joint Federal and State Competence Centre for Media Protection of Young Persons on the Internet) is tasked to conduct "*initial assessments*" of the precautionary measures taken by service providers. Once the BzKJ determines that a service provider has not taken any or has not taken sufficient precautionary measures, it will "*give the service provider the opportunity to comment and advise it on the necessary precautionary measures*". If the service provider in question does not take the necessary precautionary measures even after the advice has been provided, the BzKJ "*shall request that the service provider remedy the situation within a reasonable time frame*". Now, if the service provider does not or does not adequately comply with this request by the specified deadline, the BzKJ can impose the necessary precautionary measures, setting a new appropriate deadline.

Alternatively, a service provider can fulfil the new duty by defining and implementing measures in guidelines that specify the precautionary measures, if these guidelines having been agreed with an acknowledged co-regulatory body of which the service provider is a member, if the guidelines have been submitted to the BzKJ for assessment of appropriateness beforehand, and if they have been published following the BzKJ's confirmation of appropriateness. § 24c JuSchG states that in the process of drafting such guidelines, the perspective of children and young people and their concerns must be appropriately considered.

Germany's federal lawmaker has stated in the law's justification that it transposes Article 28b (1) a) AVMSD with § 24a JuSchG. The AVMSD provision had been implemented in national legislation beforehand by § 5a JMStV (Jugendmedienschutz-Staatsvertrag, Interstate Treaty

on the Protection of Human Dignity and the Protection of Minors in Broadcasting and in Telemedia). Since § 24a JuSchG is a federal law, its entry into force on 1 April 2021 made § 5a JMStV obsolete.

Regarding the "dialogic process" in cases of supervisory measures against platforms that do not implement adequate and effective precautionary measures, the interpretation and implementation is taking place on the level of the BzKJ and its newly-established advisory board, as well as on the level of legal academic discourse. All in all, the move to better mitigate children's interaction risks on user-generated platforms has been well discussed and resulted in a common understanding of the issue.

Shared vision for change

In view of the commonly agreed need for action, the former federal government promised the following in its coalition contract – in line with the results of joint working groups of Bund and Länder:

> *"Digital media open up many opportunities for children and young people. At the same time they are constantly accessible, regardless of location, and are thus exposed to massive new risks. The increase in cyberbullying, grooming and sexualised violence, the risk of addiction and guidance to self-harm on the internet is worrying. Contemporary youth media protection must ensure the protection of children and young people from dangerous content, guarantee the protection of their personal rights and their data and further develop the instruments to strengthen media competence. Therefore, we will create a sustainable and coherent legal framework – taking into account the competences of the Länder – for the protection of children and young people in the Interstate Treaty on the Protection of Minors in the Media and the Youth Protection Act.*
>
> *We curb the risks of interaction (e.g. with chat functions) and ensure effective enforcement of the protection of children and young people in the media, also with regard to offerings not based in Germany, while preserving the competences of the Länder."*

Source: Koalitionsvertrag zwischen CDU, CSU und SPD, 19. Legislaturperiode,[129] (translated by the author)

The reform took place in parallel with comparable regulatory approaches in the UK, specifically the "duties of care" of service providers in the draft Online Safety Bill. Both legal ventures mark a more outcome-oriented approach to regulation that consider (highly) personal communication spaces and use of mobile (and therefore less controllable) end devices used by contemporary youth.

During the reform process of the JuSchG, many stakeholders took the opportunity to react to the drafts of the act. It became clear that many stakeholders generally supported the idea of

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[129] https://www.bundesregierung.de/resource/blob/974430/847984/5b8bc23590d4cb2892b31c987ad672b7/2018-03-14-koalitionsvertrag-data.pdf?download=1

providing protecting or supporting precautionary measures with regard to interaction risks but criticised the plan to establish a new supervisory body – regardless of the "dialogic process" – parallel to the already competent State Media Authorities that are being tasked with content-related supervisory functions.

Among these stakeholders only one youth organisation could be found; no other direct participation of youth representatives has taken place during the consultation phase.

Existing common (progress-oriented) agenda

A formal agenda regarding the progress of the implementation of precautionary measures does not (yet) exist. However, since the BzKJ was tasked with the supervision of the compliance with § 24a JuSchG, the authority has begun to hire additional personnel and to work on strategic plans and conceptual approaches to control relevant providers. One of the focus points is the operationalisation of features and functionalities of services that bear risks for the personal integrity of children; another is the assessment of whether precautionary measures are adequate and effective.

In addition, a new advisory board has been established with the BzKJ, consisting of 12 people committed to realising the rights and protection of children and young people. Bodies representing the interests of children and young people are entitled to three places on the board, while two of these must be filled with people who are not more than 17 years of age at the time of their appointment.

Since none of the current co-regulatory bodies has officially started to work on agreed guidelines according to § 24b JuSchG, the only existing procedure in cases of possible non-compliance of a service provider is the one laid down in law: usually, 'jugendschutz.net' (the Joint Federal and State Competence Centre for Media Protection of Young Persons on the Internet) will conduct initial assessments of the precautionary measures taken by service providers. The body will inform the BzKJ of its initial assessments. The BzKJ then determines whether a service provider has not taken any or has not taken sufficient precautionary measures.

In case of an alleged infringement of § 24a JuSchG, this will be the starting point for the "dialogic process", where the BzKJ will give the service provider the opportunity to comment and advise it on the necessary precautionary measures. Since this step is neither a formal investigation nor an administrative act, this dialogue between the federal body and the service provider can be seen as rather counselling or supporting, where the service provider might discuss the differing viewpoints and arguments. However, if the service provider does not take necessary precautionary measures after the advice has been provided, the Federal Agency can request that the service provider remedies the situation within a reasonable time frame. In case the service provider does not or does not adequately comply with the request by the specified deadline, the Federal Agency can formally order the necessary precautionary measures within a specific deadline. Before such a binding administrative order, the BzKJ has to give the KJM (Commission for Media Protection of Young Persons of the State Media Authorities) the opportunity to comment. Non-compliance with the BzKJ's administrative order will lead to a regulatory offence which can be sanctioned with a fine of

up to five million euro. Against this background, for the service providers the dialogic process seems like a low-threshold, low-risk step in communicating and interacting with the BzKJ. Whether the fact that the BzKJ is acting as both a consulting body and a supervisory agency might be detrimental to the openness and the believed eye level of the preliminary talks will have to be seen (see Section 2 below).

Degree of acceptance of/commitment to common agenda

The new legal provisions regarding the obligations to implement precautionary measures have been discussed mostly positively among legal scholars (despite the mentioned critique regarding the supervisory structure), since it does not oblige the service providers to implement specific measures but grants them enough leeway to adapt to the respective service, its functionalities, the accompanying risk potentials for children and the underlying business model. In most cases, service providers have already implemented measures (to different degrees) to protect children online. Hence, a general openness of providers towards protecting or supporting child-oriented measures and functionalities can be assumed.

However, the new provisions and the procedure laid down in law contain several vague legal terms that might pose a challenge for both the dialogic process and the potential following administrative procedure: regarding the implemented, improvable, or missing precautionary measures it is expected that dissensions will occur concerning their "adequacy" and their "effectiveness". While some service providers will claim that current measures fulfil both legal requirements, the BzKJ might conclude that it needs more or other precautionary measures. The dialogic process can serve as a forum for the first exchanges of perspectives and arguments, including understanding how to interpret the provision when applied to the respective service, among other things: What risks does the service pose for the personal integrity of children? What countermeasures have been implemented to mitigate these risks? Are these measures adequate considering the risk(s)? Are they effective in mitigating the risk(s)?

Independent of possible future monitoring findings by jugendschutz.net, the BzKJ has started to reach out to bigger service providers to start a conversation regarding the precautionary measures. As these talks are not based on any first assessments of non-compliance, the conversation can be seen as the BzKJ's wider understanding of its mission regarding a dialogic process. These exchanges are taking place on a bilateral level and their content is not made public. The BzKJ has also continued its project, "ZUKUNFTSWERKSTATT", where it aims to establish a central discourse space for the further development of protection of children and young people.

Meanwhile, the Safer Internet Centre (SIC) ("klicksafe"), support and awareness initiatives and youth, as well as family counselling services, expect rising information needs by children, parents and educators. Due to the new obligations, many service providers might implement a series of new measures which will only be effective if the services' users actually make use of the implemented features or functionalities. More knowledge transfer is expected to be necessary to be aware of new features and to use them on a day-to-day basis. All in all, the

information needed by parents and children will become more complex, calling for more specialised support services.

Representativeness of formal partners/parties or amount of buy-in by third parties

The degree of "representation" is structurally limited due to the hierarchical relation between the BzKJ as the supervisory body and the regulatory addressees. Since talks between the BzKJ and service providers will regularly take place as bilateral communication, there will be no forum for discussion across the providers affected by the new legal provision; the JuSchG implements no integral multi-stakeholder approach. While the concrete "dialogic process" might be able to create a discursive situation at eye level, two aspects seem to be able to strengthen representativeness and/or buy-in by third parties in general.

As explained, a formal administrative procedure by the BzKJ in cases of non-compliance with § 24a JuSchG might result in substantial fines. This heavy stick in the background can be seen as a strong incentive to find a solution during the dialogic process. It can be expected that service providers will be open to talks before any formal procedure is started.

Moreover, the BzKJ has also been tasked with "the promotion of a joint assumption of responsibility by the state, business and civil society for the coordination of an overall strategy" to achieve the legal objectives of the Protection of Young Persons Act. It is understood that this remit includes establishing and maintaining communication and exchange activities encompassing all relevant stakeholders. Since the formal task already points towards an inclusive understanding of a successful youth protection framework, it can be expected that the BzKJ will try to establish one or several central forums for exchange and good practice.

It is not yet clear whether a co-regulatory body will initiate the drafting of guidelines according to § 24b JuSchG. This could be seen as an additional buy-in by the industry since service providers are well-represented in the co-regulatory bodies' member lists.

Coherence across policy initiatives

There are no policy initiatives related to the dialogic process specifically. However, as § 24b JuSchG tasks the BzKJ with a supervisory function regarding the precautionary measures, service providers now face two parallel supervisory structures: the BzKJ reviewing the precautionary measures on the one side, and the competent State Media Authority supervising the services' compliance with the content-related provisions of the JMStV. Since the JMStV is being seen as applicable to the content of a service only, it is expected that any dialogic processes do not interfere with any content-related supervisory functions. During the legislative process, however, several stakeholder groups have pointed out that an administrative procedure on grounds of abstract infrastructural issues might also influence the content of the service in question, resulting in overlaps of supervisory powers.

Coherence on a basic level might result from formal involvements and knowledge exchange between the different supervisory bodies, though: the BzKJ is represented in the KJM, and jugendschutz.net is supporting both bodies.

3. Measurement system

The collective impact framework emphasises the importance of a shared measurement system and agreement on the ways success is measured and reported with key indicators by all participating organisations. Applying this to the better internet for kids domain, the following is an overview of measurement systems in place and methods of evaluation and progress reporting that apply.

Ex-post evaluation and key indicators for progress and/or success

The reformed JuSchG provides an evaluation clause that indirectly targets the new § 24a JuSchG. According to § 29b JuSchG the act "*will be evaluated three years after its entry into force in order to examine the extent to which the protection objectives laid down in § 10a have been achieved*". The federal government has to inform the federal parliament of the outcome of the evaluation. After that, a report has to be submitted every two years to the BzKJ's advisory board regarding the ongoing development in achieving the protection objectives of § 10a. The federal government must submit this report to the German parliament (Bundestag) every four years. The first evaluation report will be due in spring 2024; there are no agreed indicators for measuring success (as of November 2022).

As the superior authority to the BzKJ, the federal Youth Ministry (BMFSFJ) is politically backing the new JuSchG and will monitor the ongoing implementation and application process of the new legal framework closely. Once approved guidelines have been established by a co-regulatory body, its yearly reports might also be helpful in assessing the effectiveness and outcome of the new provision.

Data collection

In Germany, several regularly conducted surveys help in painting a picture of the BIK-related situation. Moreover, relevant studies are being published on an irregular basis. However, there is no specific research accompanying the dialogic process.

- JIM and KIM: Since 1998, the JIM Study has been conducted by the mpfs (Medienpädagogische Forschungsverbund Südwest) annually as a basic study on the media use of 12 to 19-year-olds. Since 1999, the mpfs has regularly conducted a basic study on the significance of media in the everyday life of children (aged 6 to 13). With the miniKIM 2020 study, the research network has presented basic data on the media use of children between the ages of two and five for the third time after 2012 and 2014. In addition to an up-to-date assessment of the current situation, the mpfs data is being used to develop strategies and starting points for new concepts in the areas of education, culture and work.

- Jugendmedienschutzindex: The Youth Media Protection Index examines how the protection of children and young people from negative online experiences is anchored in the concerns, attitudes, skills and actions of parents, as well as children and young people themselves. The study was conducted in 2022 after a first iteration in 2017, identifying strengths and weaknesses of the current media policy regulations as well as the degree of media education services.

- Reports of jugendschutz.net: jugendschutz.net continually examines the internet for dangers for children and young people. Its focus areas are topics such as self-endangerment, political extremism, sexualised violence, harassment and cyberbullying. Its wider perspective also encompasses services containing cost traps, inappropriate advertising, or violations of personal rights of minors.

- UNESCO Internet Universality Indicators: After UNESCO adopted the Internet Universality Indicators (IUIs) in 2018 to assess the state of the national internet and the impact of national internet-related policies, Germany conducted an evaluation report. The aim of the analysis was to identify gaps and make recommendations for targeted improvements. The methodology followed the implementation guidelines developed by UNESCO. The report contains youth-related indicators.

- Children and youth report (Jugendbericht): On behalf of the federal government, an expert commission is being tasked to prepare a Jugendbericht on a four-year basis to the German Bundestag and the Bundesrat, providing an overview of the overall situation of child and youth welfare and the situation of the young generation. The 16th Children and Youth Report was presented in November 2020, the 17th is due in spring 2024. It is dedicated to democratic education in childhood and youth.

- Regarding the use of news in Germany, the Reuters Digital News Report is the largest ongoing comparative study of digital news consumption. The report takes into account 46 countries, including Germany.[130] In addition to that, the German research project "#usethenews" focuses on the news consumption and news competencies of minors in Germany.[131]

- Moreover, individual studies and surveys, e.g. on cyberbullying[132], cybergrooming[133], hate speech, and disinformation have been conducted throughout the years, with a specific focus on changes[134] due to the COVID-19 pandemic during recent years.

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[130] https://www.digitalnewsreport.org/survey/analysis-by-country/2020/ireland-2020/

[131] https://www.usethenews.de/en; cf. Hölig, S.; Wunderlich, L. (2022): Nachrichtennutzung, Meinungsbildung und Informationsorientierung junger Menschen in digitalen Medienumgebungen. In: BPJMAKTUELL, Heft 1/2022.

[132] Bündnis gegen Cybermobbing (Hrsg.) (2020), Cyberlife III - Spannungsfeld zwischen Faszination und Gefahr, Dritte empirische Bestandsaufnahme bei Eltern, Lehrkräften und Schüler/ -innen in Deutschland, Karlsruhe, November 2020, https://www.tk.de/resource/blob/2095298/e576a0e34a8731c50c60d9edbb661ca7/2020-studie-cybermobbing-data.pdf

[133] Landesanstalt für Medien NRW (2021), Kinder und Jugendliche als Opfer von Cybergrooming, Zentrale Ergebnisse der 1. Befragungswelle 2021, Hamburg, 10. Dezember 2021, https://www.medienanstalt-nrw.de/fileadmin/user_upload/NeueWebsite_0120/Medienorientierung/Cybergrooming/211216_Cybergrooming-Zahlen_Praesentation_LFMNRW.pdf

[134] Lampert/Thiel (2022): Alltag – Lernen – Wohlbefinden. Onlinenutzung von Kindern und Jugendlichen während der ersten Phase der COVID-19-Pandemie, KJug 4/2022, 144-148; Vodafone Stiftung Deutschland (ed.): Die Jugend in der Infodemie. Eine repräsentative Befragung zum Umgang junger Menschen in Deutschland mit Falschnachrichten während der Coronakrise. Düsseldorf 2020.

Besides that, EU Kids Online has provided detailed statistics on online safety with reports in 2011, 2015 and 2020.[135]

Progress/result measurements (common metrics)

While data collection and research capacity at a national level appears to be growing, indicated by the increasing number of research studies included in the Children Online: Research and Evidence (CO:RE) Knowledge Base,[136] the evidence base overall is mostly based on quantitative surveys. Here, different methodologies and irregular patterns of data collection means that it is sometimes difficult to identify trends or assess the impact of online safety measures. More research and more interviews based on qualitative or mixed methods are needed to shed some light on reasons and contexts of children online when it comes to risk exposure, risk realisation and risk mitigation, as well as resilience and coping of young people.

Refinements upon key insights/identified hurdles

It is expected that once the formal evaluation has identified hurdles in enforcing the § 24a JuSchG, respective optimisations will be implemented in the law (see above). However, since from February 2024 on the Digital Services Act (DSA) will be applicable (here: especially Article 28 (1) DSA), it remains questionable whether the European Regulation leaves room for national provisions in this field. Most legal scholars currently expect § 24a JuSchG to become inapplicable/obsolete from 2024 onwards.

4. Mutually reinforcing activities

According to the collective impact framework, mutually reinforcing activities refer to engagement of a diverse set of stakeholders, typically in multiple sectors, coordinating a set of differentiated activities through a mutually reinforcing plan of action. With a focus on the specific theme an integrated policy framework, this is considered to happen foremost in the context of the activities of the BzKJ and possible co-regulatory bodies that develop co-regulatory guidelines regarding precautionary measures as examples of coordinated joint action at a national level.

BzKJ's Future Workshop series

Already in 2017, a formal agreement on objectives between the predecessor of the BzKJ and the Federal Youth Ministry was concluded, establishing a department for the advancement of the legal framework for the protection of young persons, prevention, and public relations. Part of this agreement was the insight that close cooperation must be intended:

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[135] See EU Kids Online, Ireland Country page (n.d.) https://www.lse.ac.uk/media-and-communications/research/research-projects/eu-kids-online/participating-countries/ireland
[136] https://core-evidence.eu/

"[M]edia protection for young people can be designed in a responsible and thus sustainable manner by applying a target group-oriented overall strategy that guarantees intelligent risk management that is just as multi-layered in accordance with the complexity of the risks and dangers. This requires the bundling of proven approaches as well as new ones to be developed, which necessarily provide for regulatory, technical and educational instruments. This, in turn, can only be ensured by concerted action of all relevant actors, taking into account their respective responsibilities."[137]

For the further development of the protection of children and young people from harmful media in this sense, the agreement provides for the coordination of a youth policy strategy process with the relevant actors; the overall aim was and is to develop an encompassing strategy for intelligent risk management. Subsequently the BPjM – and now its successor the BzKJ – considers itself responsible for making the organisation and results of this strategy process transparent. Part of the process has been to further develop the dialogue processes necessary for the protection of children and young people in the media with the entire media industry, supervisory bodies, self-regulatory and co-regulatory bodies, as well as science. During several Future Workshops, relevant stakeholders have been brought together to jointly realise children's rights to protection, empowerment and participation with regard to digital media use. One of the focus points has been the (societal) responsibility of the service providers, making way for the current legal approach concerning precautionary measures. A central outcome of the strategy process has been the publication of the "Gefährdungsatlas"; based on the current media use by children and adolescents, it provides orientation on media phenomena, the dangers associated with them and, where appropriate, development opportunities for children and adolescents, and classifies the challenges to the protection of minors from the point of view of children's rights.[138] In light of the new and extended remit of the BzKJ (see above), the body is currently reworking the strategy process.

Co-regulatory bodies as development forums of industry guidelines

Since a significant range of relevant service providers are members of acknowledged co-regulatory bodies in the Germany system of protection of young persons against media-based harms, it is these bodies – in the area of telemedia services mainly the FSM – that might initiate good practice across service providers by initiating and pursuing talks aiming at the development of agreed guidelines that concretise or even operationalise adequate and effective precautionary measures according to § 24a JuSchG (see above).

These two examples exemplify aspects of mutually reinforcing activities envisaged by the collective impact framework. And while both processes might have a strong central actor,

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[137] Zielvereinbarung zwischen dem BMFSFJ und der BPjM, Juli 2017, https://www.bzkj.de/resource/blob/176384/fb93f84a81ce96137e103f73d3adef31/zielvereinbarung-data.pdf
[138] Brüggen et al. (2022), Gefährdungsatlas. Digitales Aufwachsen. Vom Kind aus denken. Zukunftssicher handeln. Updated and extended 2nd edition. Bonn. https://www.bzkj.de/resource/blob/197826/5e88ec66e545bcb196b7bf81fc6dd9e3/2-auflage-gefaehrdungsatlas-data.pdf

the overall idea shows the openness for and interest in multi-stakeholder approaches, fostering the potential outcome of common goals and delivery based on sharing of resources and cross-sector participation.

5. Communication

The collective impact approach suggests that consistent and open communication is needed across the many players to build trust, assure mutual objectives, and create common motivation. Communication activities are seen as an important means of building public awareness and commitment to the goals of the initiative and the objectives for social change. As with other aspects of the framework, this is not always directly applicable to online safety as a policy issue – particularly given its basis as a governmental legislative initiative – though as set out in the preceding sections, some elements are relevant.

- Communication in respect of the development of the new legal framework has been extensive, including consultations and hearings for two iterations of the JuSchG. The Federal Youth Ministry published the relevant drafts, explanatory papers as well as the public hearings, and received respective comments.[139]

- The ongoing process of the BzKJ's "Zukunftswerkstatt" (see above) is made transparent by regular publications on the steps achieved.[140] Relevant deliberations and decisions of the BzKJ's advisory board are published via press releases.[141]

- All relevant analyses conducted by jugendschutz.net are available on the body's website; the same goes for their extensive yearly reports.[142]

- Klicksafe, as Germany's national Safer Internet Centre, develops and disseminates information, advice, and tools to children and parents to provide awareness, orientation and support.[143] Moreover, it publishes educational resources to integrate digital citizenship and online safety into teaching and learning in schools. Part of such information material are explanations regarding precautionary functionalities offered by service providers and how to use them.

- There have been several notable industry and civil society partnerships in online safety that have served to support additional educational capacity and awareness raising.[144]

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[139] https://www.bmfsfj.de/bmfsfj/service/gesetze/zweites-gesetz-zur-aenderung-des-jugendschutzgesetzes-147956
[140] Cf., inter alia, https://www.bzkj.de/bzkj/zukunftswerkstatt; Die ZUKUNFTSWERKSTATT als zentraler Diskursraum zur Ausgestaltung des erweiterten gesetzlichen Auftrags, BzKJ aktuell 2/2022; Die ZUKUNFTSWERKSTATT als zentraler Diskursraum zur Ausgestaltung des erweiterten gesetzlichen Auftrags, BzKJ aktuell 4/2021.
[141] https://www.bzkj.de/bzkj/beirat/sitzungen
[142] https://www.jugendschutz.net/mediathek
[143] Cf. https://www.klicksafe.de/materialien
[144] Inter alia, https://www.wakeup.jetzt/, https://no-hate-speech.de/,

6. Backbone organisation

According to the collective impact framework, a separate organisation or organisations with staff and a specific set of skills to serve as the backbone for the entire initiative and coordinate participating organisations and agencies is most suitable. The availability of a supporting backbone organisation is especially important in the further development and implementation of an up-to-date policy framework that manages the diverse perspectives and inputs of different stakeholder groups.

Separate/integrated backbone organisation

- Regarding the new precautionary measures, the BzKJ has been tasked with the supervisory role. It will be informed about monitoring results by jugendschutz.net and has to consult with the KJM before any formal decisions. During the explained dialogic processes it will be able to not only get insights into arguments and perspectives on precautionary measures by service providers, but it will also be the central actor in establishing forums for legal interpretation, practical implementation and best practice exchanges.

- In general, the German legal framework regarding online safety of children is divided between the federal government's JuSchG and the Länder's JMStV, showing overlapping areas, parallel competent bodies and incoherent provisions and yardsticks to a significant degree. Almost all stakeholders have made the criticism that a plan to develop a more coherent and convergent framework is still not existent.

Leadership, support and guidance activities

- Leadership has long been identified as a key element in ensuring acceptance and support for collective or collaborative forms of governance.[145] Due to the divergent regulatory framework – also in the area of platform-related governance – in Germany, no clear leadership position can be observed: as described above, the BzKJ is responsible for overseeing compliance with § 24a JuSchG and is tasked with establishing a strategy to modernise the online safety governance approaches. However, the KJM and the competent State Media Authorities of the Länder are responsible for content- and advertising-related regulation and supervision, with the acknowledged co-regulatory bodies enforcing co-regulatory measures. While the State Media Authorities are deemed independent according to Article 30 AVMSD, the BzKJ formally is a sub-department of the Federal Youth Ministry (BMFSFJ). With regard to BzKJ decisions in the context of § 24a JuSchG, no commission or body is being designated; a single civil servant within the BzKJ could decide on initiating a proceeding against a service provider.

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[145] Tambini, D., Leonardi, D., & Marsden, C. T. (2008). Codifying cyberspace: Communications self-regulation in the age of Internet convergence. Routledge.

- Since the majority of the material scope of § 24a JuSchG will be made obsolete with Article 28a DSA, it is still unclear whether and which role the BzKJ will take over after January 2024. In anticipation of the coming into effect of the Digital Services Act, and specifically the obligation to designate a competent authority for implementing and enforcing the DSA, the German government has not yet decided whether to establish a new body or to delegate this role to one or several existing bodies to different degrees. The BzKJ with its narrow focus does not seem to be at the centre of such considerations, but might be tasked with specific supervisory functions related to the scope of Article 28 DSA.

- Like in many Member States, the German Safer Internet Centre (SIC) (klicksafe) is a key national resource in delivering online safety activities and programmes. As SICs are deemed to be one of the most visible points of contact at the national level for online safety matters, the insecurity in sustainable (EU or other) funding leads to short-term planning, making medium- or long-term strategies and projects difficult.

- NGOs and service providers are also sources of trusted guidance and advice regarding online safety. With Germany being the biggest EU market for most of the big tech platforms, many have started their own campaigns or campaigns in co-operation with third parties (like NGOs or co-regulatory bodies).

7. Summary

This case study highlights some of the most relevant aspects of the current framework in Germany with a focus on the newly-established obligations of user-generated content service providers to implement precautionary measures aimed at child safety online. Using the collective impact framework as an analytical tool, the following focus points could be identified as the most significant when it comes to effective contributions in this area:

Common agenda

- Making user-generated content service providers more responsible has been on Germany's political wish list for years. With the new provision in § 24a JuSchG, the federal lawmaker incorporated an obligation for these providers (with a minimum of one million users) to implement precautionary measures to protect children, specifically against risks for their personal integrity.

- The newly created supervisory body, the BzKJ (Bundeszentrale für Kinder- und Jugendmedienschutz, Federal Agency for the Protection of Children and Young Persons in the Media), has been tasked with supervising compliance. Before a formal administrative procedure commences, the new body aims to talk to the service provider on eye level to sort things out. These talks are being discussed under the term "dialogic process".

- During the reform process of the JuSchG, many stakeholders took the opportunity to react to the drafts of the act. All in all, the move to better mitigate children's interaction risks on user-generated platforms has been well discussed and resulted in a

common understanding of the issue. However, direct youth participation has been marginal.

- While a formal agenda regarding the progress of the implementation of precautionary measures does not (yet) exist, the BzKJ has worked on strategic plans and conceptual approaches to control relevant providers. In addition, a new advisory board has been established with the BzKJ, consisting of 12 people committed to realising the rights and protection of children and young people; two of the members must be filled with people who are no older than 17 years.

- The degree of "representation" is structurally limited due to the hierarchical relation between the BzKJ as the supervisory body and the regulatory addressees; however, the BzKJ has also been tasked with "*the promotion of a joint assumption of responsibility by the state, business and civil society for the coordination of an overall strategy*" to achieve the legal objectives of the Protection of Young Persons Act. It is understood that this remit includes establishing and maintaining communication and exchange activities encompassing all relevant stakeholders.

Measurement system

- Evaluations of the new provision are formally embedded within the legal framework. No indicators have been agreed on yet.

- In Germany, several regularly conducted surveys regarding BIK-related issues take place, with additional relevant studies being published on an irregular basis. However, there is no research accompanying the dialogic process specifically.

Mutually reinforcing activities

- The BzKJ is responsible for developing and nurturing a strategy process for children's safety online including all relevant stakeholders. Since 2019 it has conducted a series of evidence-based and open-ended workshops with all relevant stakeholders to jointly realise children's rights to protection, empowerment and participation with regard to digital media use.

- A central outcome of the strategy process has been the publication of the "Gefährdungsatlas", a publication providing orientation on media phenomena, the dangers associated with them and, where appropriate, development opportunities for children and adolescents, including classifying the challenges to the protection of minors from the perspective of children's rights. Currently, the BzKJ is reworking the strategy process.

Communication

- The ongoing process of the BzKJ's "Zukunftswerkstatt" is made transparent by regular publications regarding the latest activities and insights.

Backbone organisation

- The BzKJ might be an adequate player to implement both the dialogic process with service providers as well as the modernisation of the governance framework. However, due to the overlapping legal frameworks between Bund and Länder in Germany, competencies are not 100 per cent clear, resulting in potential parallel supervision. The BzKJ can be seen as the central actor in establishing forums for legal interpretation, practical implementation and best practice exchanges.

- It is still disputed whether the material scope of § 24a JuSchG will be made obsolete with Article 28 DSA, and if so, what role the BzKJ will take over after February 2024. Until then, the BzKJ seems like a central backbone organisation vital for the implementation of the commonly agreed agenda.