The Better Internet for Kids (BIK) Policy Map

Fourth edition

2023

The Better Internet for Kids Policy Map, Fourth edition

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

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List of abbreviations

AI	Artificial Intelligence
AVMSD	Audiovisual Media Services Directive
BIK	Better Internet for Kids
BIK+	The new European strategy for a better internet for kids (BIK+)
DEAP	Digital Education Action Plan
DSA	Digital Services Act
EEA	European Economic Area
EUN	European Schoolnet
GDPR	General Data Protection Regulation
SIC	Safer Internet Centre
SID	Safer Internet Day
SIF	Safer Internet Forum
UNCRC	UN Convention on the Rights of the Child

Executive summary

The BIK Policy Map, which was created to compare and exchange knowledge on policies and activities to support children's well-being in the digital environment, including measures specified in the BIK strategy, presents findings on policy frameworks, policy-making and policy implementation in all EU Member States, Iceland and Norway. The fourth edition of the BIK Policy Map is the first overview of policies since adopting the updated European strategy for a better internet for kids (BIK+) in May 2022. Its findings are organised under the three pillars of the BIK+ strategy – safe digital experiences, digital empowerment, and active participation.

Policy frameworks and policy-making

Policy frameworks refer to the organising principles and long-term goals underpinning the diverse policies developed nationally to support children in their digital practices.

This edition of the BIK Policy Map finds that there is active engagement with the topic of children's internet use in all countries, with many new policy developments in this area. Stakeholder involvement, evidence-based policy-making, and active policy debate of BIK-related topics all show small increases since 2020, when the last policy mapping was undertaken. There is also increasing awareness of the goals of the BIK+ strategy, and more countries identify the BIK+ strategy as something which informs their national policy. However, in practice, there is high variability in how policy priorities are specified and consequently, a cohesive approach to BIK policy at the national level is still lacking. There is, thus, a risk of fragmentation between different areas of policy development and competing policy objectives. Despite some consolidation, the siloed nature of policies in this area, noted in the very first BIK Policy Map report (DIGIWORLD by IDATE et al., 2014), is still evident, suggesting that drawing together the different strands of BIK-related policy within a common strategic framework remains a challenge.

The main gaps highlighted in this edition of the BIK Policy Map are the need for dedicated governance structures for policies and their implementation in the context of a better internet for children, the continuing need for robust and comparative research, and a systematic approach to evaluation to monitor progress in the attainment of BIK policy objectives. The lack of reference to child rights impact assessments in national policy development and evaluation approaches is also noteworthy. Continued focus on these aspects in future BIK Policy Map studies is needed, with more detailed attention to policy design and governance, particularly in the context of new and emerging regulatory structures for the digital environment.

Safe digital experiences

Pillar 1 of the BIK+ strategy – safe digital experiences – aims to protect children from harmful and illegal online content, conduct, contact and consumer risks. It was

found to be an important and evolving area of policy development nationally in participating countries. This is a policy area in which government ministries lead with the significant involvement of public agencies with BIK responsibility and Safer Internet Centres (SICs). Indicators from the original BIK strategy, such as simple reporting tools for users, age-appropriate privacy settings, and content classification, remain highly relevant due to the coming into effect of the GDPR (General Data Protection Regulation) and obligations for the protection of minors under Article 28b AVMSD (Audiovisual Media Services Directive). Most countries report increased resources for law enforcement in fighting against online child abuse material. The area of consumer law to protect children as digital consumers was found to be less well-developed. With the proposed development of the EU code of conduct on age-appropriate design, this area will likely receive increased attention at the country level.

Digital empowerment

Pillar 2 of the BIK+ strategy – digital empowerment – aims to better empower children to make sound choices online and covers digital literacy and awareness-raising activities. This was found to be a well-established area of practice in all countries in the BIK Policy Map. Safer Internet Centres, government ministries with BIK responsibility, and public agencies with BIK responsibility lead in policy development and delivery of activities on this topic. Safer Internet Centres remain a leading policy actor in supporting digital empowerment at the national level.

A high level of commitment to teaching online safety in schools is demonstrated with online safety education and fostering digital and media literacy being a continuing high priority in all Member States. The range of new curricular innovations and new training programmes show that this area continues to evolve and respond to a changing digital environment. A key area of further development concerns the availability of national policies and measures to tackle forms of digital divide that affect children's equal, effective, safe and inclusive access to digital technology. The capacity of online safety education and skills development to respond to new areas of digital technology – including virtual reality (VR) and augmented reality (AR), artificial intelligence (AI) and the use of AI-based communication – will be important areas to monitor in future BIK Policy Map studies.

Active participation

Pillar 3 of the BIK+ strategy – active participation – aims to respect children by giving them a say in the digital environment. According to this edition of the BIK Policy Map, it is the least developed of the three BIK+ pillars at the national level. While high levels of participation of youth, in general, are reported, this is seldom as decision-makers and instead takes the form of consultations, hearings and specific surveys. Children's involvement in developing national public awareness-raising campaigns, supported by SICs and BIK Youth Ambassadors, is noteworthy in all countries. However,

mechanisms to involve children more directly in the policy process are much less developed.

In terms of fostering innovative and creative digital experiences, the trend noted in the 2020 BIK Policy Map towards an increased focus on supporting children's digital creativity has been maintained. 27 of the 29 countries (93 per cent) in the study say there are actions at the national level to stimulate the production and visibility of quality content for children. However, actions to implement and monitor standards for quality online content for children are scarce.

As a newly defined pillar within the BIK+ strategy, it will be important to monitor further development of this policy area at the national level to include opportunities for children's participation in public decision-making, the embedding of children's rights as a cross-cutting action, child-led evaluation activities, and the fostering of innovative and creative digital experiences.

Recommendations

The report concludes with a number of recommendations from the perspective of the Collective Impact model of social change on further developing the effectiveness and impact of the BIK+ Strategy.

Introduction

This is the fourth report of the Better Internet for Kids (BIK) Policy Map, a series that began in 2014 with the aim of mapping the implementation of the *European Strategy for a Better Internet for Children* (the 'BIK strategy') in EU Member States and the EEA.[1] In May 2022, a new European strategy for a better internet for kids (BIK+)[2] was adopted by the European Commission to improve age-appropriate digital services and ensure that every child is protected, empowered and respected online, with no one left behind.[3] Accordingly, this is the first BIK Policy Map to report on developments in EU Member States, Iceland and Norway with the new BIK+ strategy as the underpinning framework.

Background to the BIK Policy Map

The BIK Policy Map was created to compare and exchange knowledge on policies, programmes and activities to support children's well-being in the digital environment, including measures specified in the BIK strategy.

The first report in the series, *Mapping Safer Internet Policies in the Member States* (DIGIWORLD by IDATE et al., 2014), was the first full review of national policies addressing children's participation in the digital environment across the European Union. The study established a framework for analysing BIK-related policies in all EU Member States, Iceland, and Norway and also developed the BIK Map tool – a data collection instrument used to gather information on national policies – allowing the analysis of public policies in terms of governance and actions. The resulting report found that the implementation of EU policies such as the Safer Internet Programme and the BIK strategy was subject to country-specific dynamics, including the relative sensitivity to the topic at a national level, the cultural context and the level of commitment among the various stakeholders.

The second BIK Policy Map report (O'Neill and Dinh, 2018) was coordinated on behalf of the European Commission by European Schoolnet (EUN) and provided a review of progress since the first baseline study. The report found that while there was wide support for children's online safety in policies and activities in EU Member

[1] https://eur-lex.europa.eu/legal-content/EN/ALL/?uri=CELEX:52012DC0196
[2] https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=COM:2022:212:FIN
[3] Further information and factsheets are available at: https://digital-strategy.ec.europa.eu/en/library/digital-decade-children-and-youth-new-european-strategy-better-internet-kids-bik

States, there were some significant gaps in policy governance and stakeholder participation at the national level.

The third BIK Policy Map (O'Neill, Dreyer et al., 2020) provided a more extensive overview with profiles of policies and activities in 30 European countries, including all EU Member States, Iceland, Norway and the United Kingdom. The study found increased policy attention to the topic of children's online safety and participation in the digital environment. Three-quarters of participating countries also stated that the BIK strategy had influenced national policies. However, the study highlighted continuing gaps in policy governance and stakeholder participation (including children's participation) in policy-making. The report also introduced the theory of Collective Impact (Kania & Kramer, 2011) as a framework to further analyse the dynamics of policy-making highlighted in the first report. Based on this approach, further recommendations were made to strengthen policy coherence and multistakeholder cooperation.

The current report, the fourth BIK Policy Map report, has two main goals:

a) To provide an update on policies and activities in EU Member States, Iceland and Norway since the last report in 2020, in particular, to take account of new policy developments, including the coming into effect of the revised AVMSD[4] and the adoption of the BIK+ strategy.
b) To reorganise the presentation of data in the BIK Policy Map to align with the three pillars of the BIK+ strategy.

Data collection for the study was undertaken from October 2022 to January 2023 with the support of a network of national contacts comprising representatives of the Expert Group on Safer Internet for Children[5] and Safer Internet Centres in the Member States (see Annex 2). The questionnaire used for data collection – the BIK Map tool – is the same as that used in the three previous policy mapping initiatives. The BIK Map tool is organised around the four pillars of the original BIK strategy. Given that the revised BIK+ strategy was adopted relatively recently, i.e., in May 2022, and will take further time to be addressed more comprehensively at the national level, the original questionnaire was retained for this round of data collection. However, the findings are reorganised according to the new BIK+ strategy to bring this up to date and to provide a baseline for future policy mapping studies.

[4] https://eur-lex.europa.eu/eli/dir/2018/1808/oj
[5] https://digital-strategy.ec.europa.eu/en/policies/expert-group-safer-internet#

The BIK+ strategy

The new *European strategy for a better internet for kids (BIK+)*[6] aims to ensure that children are protected, respected and empowered in the digital environment. The BIK+ strategy builds on the EU Strategy on the Rights of the Child in which the commitment to update the BIK strategy was first announced.[7] It builds upon its predecessor, the 2012 *European Strategy for a Better Internet for Children* (BIK strategy), which, since its adoption, has guided and shaped national policies across Europe and beyond.

The BIK+ strategy, which was a flagship initiative of the European Year of Youth 2022, provides an ambitious vision for age-appropriate digital services, with no one left behind and with every child in Europe protected, empowered and respected online. The strategy aims to support accessible, age-appropriate and informative online content and services that are in children's best interests, building on three key pillars:

1. ***Safe digital experiences*** that protect children from harmful and illegal content, conduct, contact and consumer risks and improve their well-being online through a safe, age-appropriate digital environment created in a way that respects children's best interests.
2. ***Digital empowerment*** so children acquire the necessary skills and competencies to make sound choices and express themselves in the online environment safely and responsibly.
3. ***Active participation***, respecting children by giving them a say in the digital environment, with more child-led activities to foster innovative and creative safe digital experiences.

In the *Declaration on European Digital Rights and Principles for the Digital Decade,*[8] the Presidents of the Commission, the European Parliament and the Council articulated the shared political commitment of the EU and its Member States: to protect all children and young people against harmful and illegal content, exploitation, manipulation and abuse online; to support them in acquiring the necessary skills, including media literacy and critical thinking skills to make informed choices; and to involve children and young people in the development of digital policies that concern them.

The BIK+ strategy has been introduced at a time of significant policy change, where a series of intertwined legislative acts and strategies at the EU level are being

[6] https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=COM:2022:212:FIN
[7] https://commission.europa.eu/strategy-and-policy/policies/justice-and-fundamental-rights/rights-child/eu-strategy-rights-child-and-european-child-guarantee_en#the-eu-strategy-on-the-rights-of-the-child
[8] https://digital-strategy.ec.europa.eu/en/library/european-declaration-digital-rights-and-principles

discussed or have recently been adopted that (will) affect young people's online experiences. For example:

- The **Digital Services Act (DSA)**[9] obliges platform providers to implement appropriate and proportionate measures to ensure a high level of privacy, safety, and security for minors. Very large online platforms, as well as search engines, have to identify systemic risks, including any actual or foreseeable negative effects in relation to the protection of children, and mitigate such risks accordingly. Moreover, children must be able to easily understand the terms and conditions of the services they use, while online platforms are not allowed to show ads to children based on profiling.
- The proposed **Artificial Intelligence (AI) Act**[10] aims at ensuring trustworthy AI systems and applications that consider, *inter alia*, children's rights.
- The European Commission has proposed a regulation laying down rules to prevent and combat child sexual abuse (**CSA Regulation**)[11] aiming at detecting, reporting and removing child sexual abuse online.
- The **Digital Education Action Plan (DEAP) (2021-2027)**[12] builds a path to ensure a sustainable digital transformation in education by creating an effective digital education framework including strengthened digital skills and competences of children. The EU Youth Strategy 2019-2027[13] describes youth participation as a cornerstone for democratic life.

The BIK Policy Map conceptual model

The BIK Policy Map provides a means of comparing the availability of BIK-related policies in EU Member States, Iceland, and Norway. It provides a framework to examine how policy is created and developed, how it is overseen, coordinated and evaluated and, specifically, how it implements EU-wide policies in this area.

The conceptual model developed for the BIK Policy Map is set out in Figure 1.

[9] https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex:32022R2065
[10] https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex:52021PC0206
[11] https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=COM:2022:209:FIN
[12] https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52020DC0624
[13] https://youth.europa.eu/strategy_en

Figure 1: BIK Policy Map conceptual model

Policy framework refers to the organising principles and long-term goals that provide the basis for the range of policies, guidelines and decisions and other statements that combine to make up the overall policy response of countries to the issues raised in the BIK strategy. In the BIK Map tool, we ask about the current state of policy in each of the Member States and the kinds of policies that have been developed across each of the pillars of the BIK strategy.

Policy-making: this refers to the overall process by which policies are developed within each country. Questions here address how responsibility for coordination and oversight is managed among different stakeholders; the extent to which the policy agenda is informed by an evidence base; and whether there is a facility for young people to be involved in the policy process.

Policy pillars refer to how policy is delivered in accordance with EU policy goals for a better internet. For this version of the BIK Policy Map, findings are presented in line with the three pillars of the BIK+ strategy. Questions in the BIK Map tool include the level of involvement of the relevant stakeholders and the spread of activities that are actually covered.

The BIK Policy Map – building on the Collective Impact framework – hypothesises that greater levels of consistency across the different strands of policy (**'policy frameworks'**) combined with good governance mechanisms, robust evidence and inclusive stakeholder involvement (**'policy-making'**) can lead to more effective coverage and delivery of programmes and activities ('**policy implementation**'). While the aim of the project is to share knowledge rather than to evaluate or benchmark the implementation of the BIK strategy in individual countries, the combination of measures shows how different countries have approached policy implementation and the progress made in working towards better and more comprehensive outcomes.

The **Collective Impact model** introduced in the third BIK Policy Map (2020) developed this analysis further by highlighting the importance of i) a common agenda; ii) shared measurement systems; iii) mutually reinforcing activities; iv) continuous communication; and v) the role of a backbone organisation. The application of the Collective Impact model is discussed further in the report *Country Impact Case Studies* published in conjunction with the fourth BIK Policy Map (2023).[14]

The 2023 BIK Policy Map report

The process of updating the fourth edition of the BIK Policy Map commenced in September 2022. Data collection was supported by the Expert Group on Safer Internet for Children and Safer Internet Centres (SICs) in the Member States. National contacts were given access to the previous submission for their country and asked to review changes since 2020 and to update accordingly. While the BIK Map tool retained the original four pillars, the findings are re-organised for this report and presented in line with the newly defined pillars of *protection*, *digital empowerment* and *active participation* in line with the BIK+ 3-pillar structure.

Following this Introduction, the remainder of the report is organised as follows:

Chapter 1 – Policy frameworks and policy-making examine how countries have incorporated children's internet use into their national policies and presents an overview of existing policy frameworks related to a better internet for children. The section also examines how the relevant policies are developed at the national level regarding coordination, cooperation, participation and an evidence base.

Chapter 2 – Safe digital experiences (Pillar 1) presents findings on policies and activities in the Member States that contribute to a safe online environment for children. Measures include supporting age-appropriate privacy settings, the use of parental controls, age rating and classification, online advertising, implementation of codes of conduct, and support measures to ensure the implementation of EU legislation. Fighting against child and child sexual exploitation (Pillar 4 in the original BIK strategy) is also included for information.

Chapter 3 – Digital empowerment (Pillar 2) presents findings on improving awareness, empowerment, and digital and media literacy activities.

Chapter 4 – Active participation (Pillar 3) presents findings on how countries support the involvement of children and young people to have their say in policy decision-making regarding the digital environment. This includes the involvement of children when developing national campaigns, support for youth panels, young people's

[14] *BIK Policy Map Country impact case studies* (2023). Available at: https://www.betterinternetforkids.eu/policy/bikmap

involvement when developing legislation with an impact on their online activities, the promotion of democratic participation and fundamental rights online, and national efforts to encourage interaction, engagement and participation through digital media. Fostering innovative and creative digital experiences that are safe and age-appropriate also comes within the scope of this pillar.

Chapter 5 – Conclusions and recommendations includes an overview of the main findings of this edition of the BIK Policy Map and using this as a baseline, outlines topics for its further development through new indicators that align with the BIK+ strategy.

Chapter 1: Policy frameworks and policy-making

This chapter examines the policy process associated with BIK-related policies in EU Member States, Iceland and Norway, specifically how widely available such policies are in each country and how they are organised, coordinated and supported at the national level.

The chapter addresses two main questions. Firstly, the BIK Policy Map examines the availability of a *policy framework* at the country level. Acknowledging that better internet policies may comprise highly differentiated measures, strategies or activities across different government departments or ministries, the research asks if any framework or structure is available to unify these. Previous BIK Policy Map reports have noted the importance of coordinated policy initiatives to support children's online participation, and it is here where a dedicated policy framework is relevant. A supplementary question asks whether such policy frameworks refer to the BIK+ strategy.

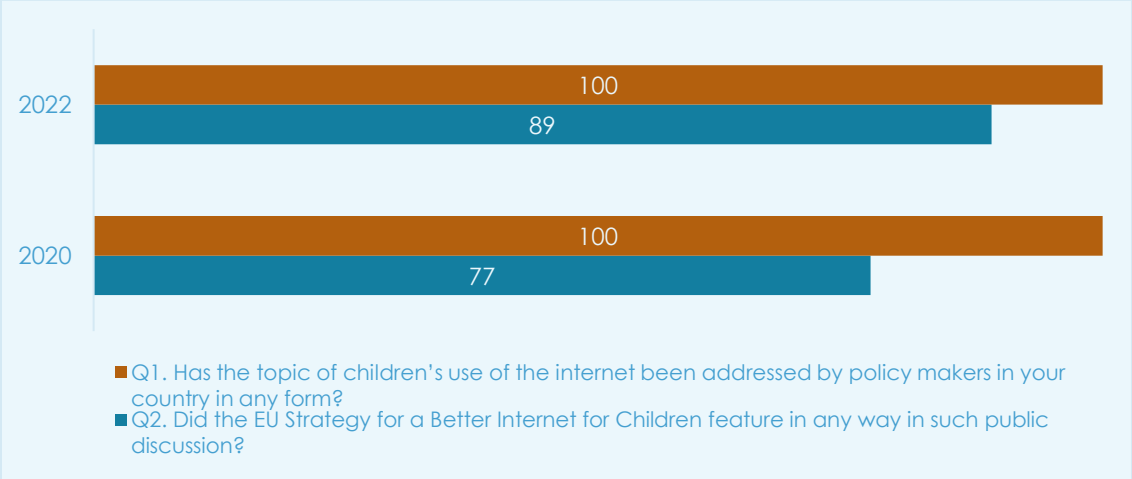
A second set of questions concerns the process of policy-making and coordination of BIK-related policies in the Member States. The research asks how policies are coordinated, how many ministries are involved in their development, whether research evidence is used to support policy development, the availability of mechanisms to support inter-departmental cooperation, and whether policies have been evaluated.

The BIK Policy Map hypothesises that setting a common agenda, for example, in a strategic policy framework at the national level, supported by good governance mechanisms, a robust evidence base and strong stakeholder involvement, leads to more effective outcomes and impact on children's digital experiences. Using the Collective Impact theory of social change as an underlying model (Kania & Kramer, 2011), the BIK Policy Map explores evidence from Member States, Iceland and Norway to illustrate relevant trends and share good practices.

BIK policy frameworks

Countries were first asked if the topic of children's use of the internet had been addressed by policymakers in any form and, if so, the extent to which the BIK strategy featured in policy development.

Figure 2: *Policy on children's online use at the national level*



As shown in Figure 2, all 29 countries – all EU-27 Member States, Iceland and Norway – confirm that children's internet use is addressed in national policy (Q1.)

25 out of 29 countries (89 per cent) say that the BIK strategy has featured in such policies, an increase from 77 per cent or 23 countries which reported that the BIK strategy had influenced national policies in the 2020 BIK Policy Map.

National contacts were asked to provide further context regarding policies influenced by the BIK strategy. A sample of comments is given below:

- The National Strategy for Better Internet for Children[15] in **Cyprus** has taken into account the guidelines of the European Better Internet Strategy for Children. It has also adopted ideas from other strategies and actions at national, European, and international levels while adapting the suggestions in the Cypriot context by assessing the needs of different population groups (teachers, parents, and children) in the evidence base.
- In August 2021, the **Danish** Government, through the ministries of Commerce, Justice, Culture and Education, launched a new strategy, *The Responsibility for Social Media*. The three themes of the strategy – the responsibility of social media in relation to illegal content, better protection of social media users, and targeted action in relation to children's use of social media – align closely with the three pillars of the BIK+ strategy. The Media Council was given new tasks based on the strategy: developing ethical guidelines for social media and developing guidance systems for children, parents and other stakeholders on the risks of social media use.[16]
- In **Finland**, in October 2022, the Parliament held formal hearings regarding the new BIK+ strategy. Several organisations and experts, including KAVI and

[15] https://www.esafecyprus.ac.cy/
[16] https://www.medieraadet.dk/en

Mannerheim League for Child Welfare, provided statements. The report states that the Finnish Safer Internet Centre will adjust its goals according to the new strategy.

- In **Slovenia**, the BIK strategy contributes to this topic's overall awareness and importance. It is an important reference in policy debates and in preparing further policy documents and additional legislative proposals, such as Slovenia's New Programme for Children 2020-2025, currently in development.[17]
- In **Portugal**, the BIK strategy is relevant to the Portuguese Safer Internet Centre consortium's work, particularly informing its policies on digital citizenship education. The BIK strategy has also been used to develop a guiding roadmap for digital ambassadors who support Portuguese schools in the process of digital transition.[18]
- In **Croatia**, the provisions of the BIK strategy have been incorporated into the *National Plan for Children's Rights in the Republic of Croatia from 2022 to 2026* and the *Action Plan for Children's Rights in the Republic of Croatia for the period from 2022 to 2024*.
- During the **Czech Republic's** Presidency of the Council of the EU in 2022, the BIK strategy was one of the discussion topics of the conference EU Secure and Innovative Digital Future.[19] This included a screening of the documentary *Caught in the Net* followed by a debate with experts from the Commission, representatives of the Czech Safer Internet Centre and youth representatives. National stakeholders also contributed to comments on BIK+, informing the Czech position on the strategy.
- The BIK and BIK+ strategies have been influential in developing national public policies on this topic since their launch in **Spain**. For example, the BIK strategy is specifically referenced in the regulatory impact assessment undertaken for the *General law on Audiovisual Communication (Law 13/2022)*,[20] as well as in the development of the organic law on the *Comprehensive Protection of Children and Adolescents against Violence (LO 8/2021)*,[21] and in the development of the National Cybersecurity Strategy.[22] The BIK+ strategy continues to play an important role in new policy developments, such as the draft strategy on the rights for childhood and the draft strategy to eradicate violence against children and adolescents.
- In **Germany**, various references to the BIK strategy were made while amending the German Youth Protection Act 2020 – 2021.[23]

Nearly all submissions note the importance of the BIK strategy in fostering support for Safer Internet Centres. As mentioned by Greece and Norway, Advisory Boards for

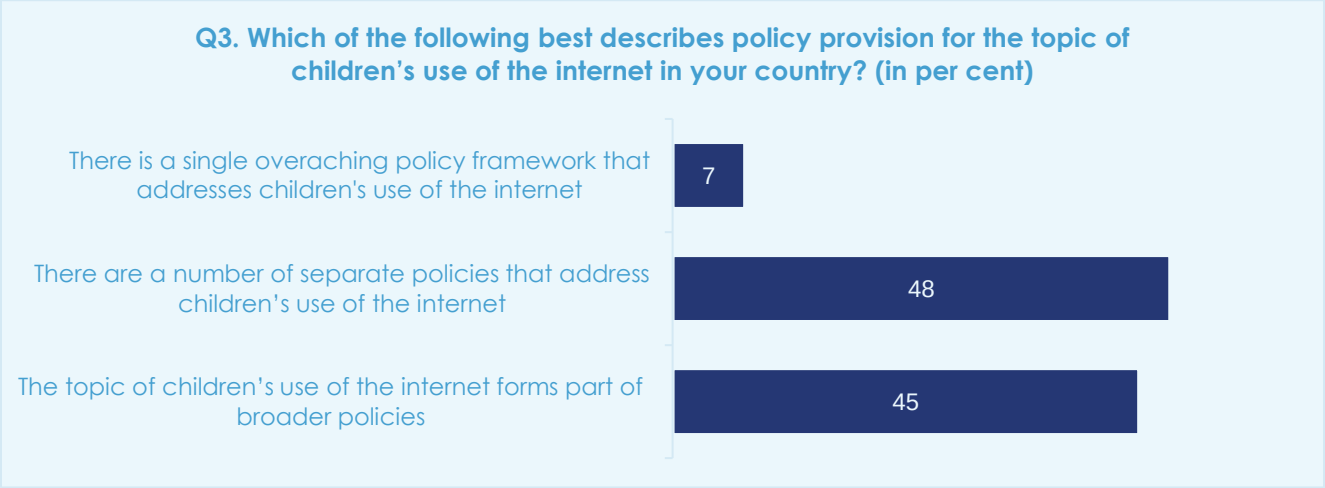
[17] https://www.gov.si/en/news/30th-anniversary-of-the-convention-on-the-rights-of-the-child/
[18] See: Centro Internet Segura (2020). *Final Report: Portuguese Safer Internet Centre V*. https://www.internetsegura.pt/sites/default/files/2021-03/PT_SIC_V_Final_Public_Report_2020.pdf
[19] https://www.digitalconference2022.cz/
[20] https://www.boe.es/diario_boe/txt.php?id=BOE-A-2022-11311
[21] https://www.boe.es/eli/es/lo/2021/06/04/8
[22] https://www.boe.es/boe/dias/2019/04/30/pdfs/BOE-A-2019-6347.pdf
[23] https://www.bmfsfj.de/bmfsfj/meta/en/youth

Safer Internet Centres act as an important communication channel, bringing together all of the relevant stakeholders (ministries, law enforcement, ISPs, NGOs, consumer groups) into a single body and serving the important function of information and knowledge exchange between the European and national levels. The Belgian Safer Internet Centre also notes that the BIK strategy is the standard reference document when creating new content, tools and campaigns and is widely used in its advocacy work with different stakeholders and policymakers.

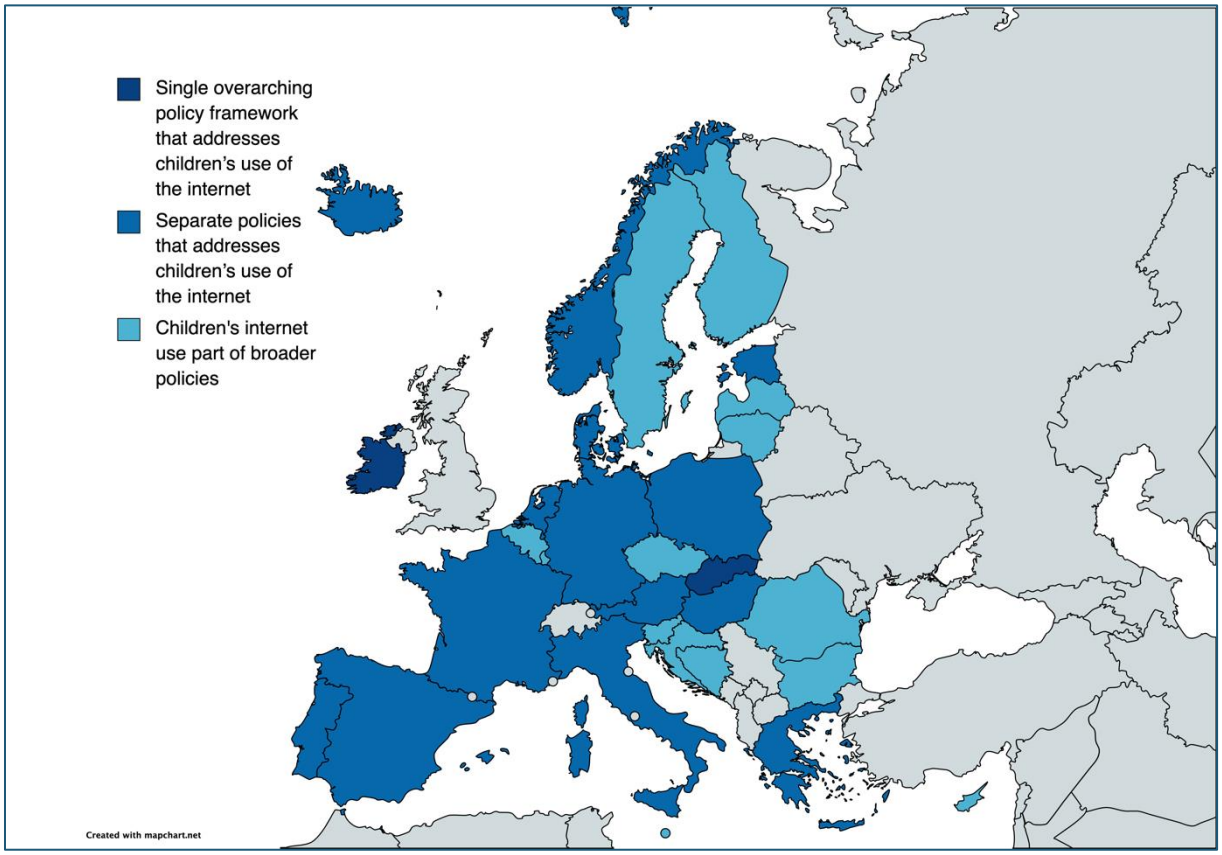
How has policy been implemented at the national/regional level?

Countries were also asked to state whether policy provision for children's use of the internet took the form of a) a single overarching policy framework, b) separate policies that address this policy topic, or c) if the subject of children's internet use has been incorporated within broader policies.

***Figure 3**: Policy provisions at the national/regional level*



Q3. Which of the following best describes policy provision for the topic of children's use of the internet in your country?



As shown in Figure 3, countries are evenly divided as to the extent to which they have dedicated policies on this topic and those which incorporate children's digital participation into broader policies.

- Just two countries – Ireland and Slovakia – say there is a single overarching integrated policy framework that addresses children's internet use in the country (shaded in dark blue).
- 14 of the 29 countries, or 48 per cent (shaded in blue), say that there are a number of separate policies at the national level that address children's internet use.
- 13 of the 29 countries, or 45 per cent (shaded in light blue), report that children's internet use is included in broader policies.

There has been relatively little change in this aspect of BIK policy at the national level over successive editions of the BIK Policy Map. Since the last BIK Policy Map in 2020, just two countries reported that they had developed an integrated policy framework at the national level with regard to children's internet use. The remaining countries are evenly divided between those where children's online use is addressed in dedicated but separate policies and those where children's internet use forms part of broader policies.

As evidenced elsewhere in the BIK Policy Map, this suggests that the different dimensions of the BIK+ strategy – protection, empowerment and participation pillars – are, for most countries, more optimally addressed in separate policies for digital protection, education and overall youth strategy, for instance. Approximately half of the countries in the BIK Policy Map fall into this category. For remaining countries, however, children's internet use is not treated as a policy topic in its own right but rather is incorporated within broader digital policies. Future research will need to continue to track this aspect, given the increased emphasis on protecting minors and supporting their well-being at the EU policy level.

BIK policy-making

In addition to the availability of dedicated policies focused on children's internet use, the BIK Map tool also looks at policy development and policy-making processes. Three main questions are addressed in this part of the study:

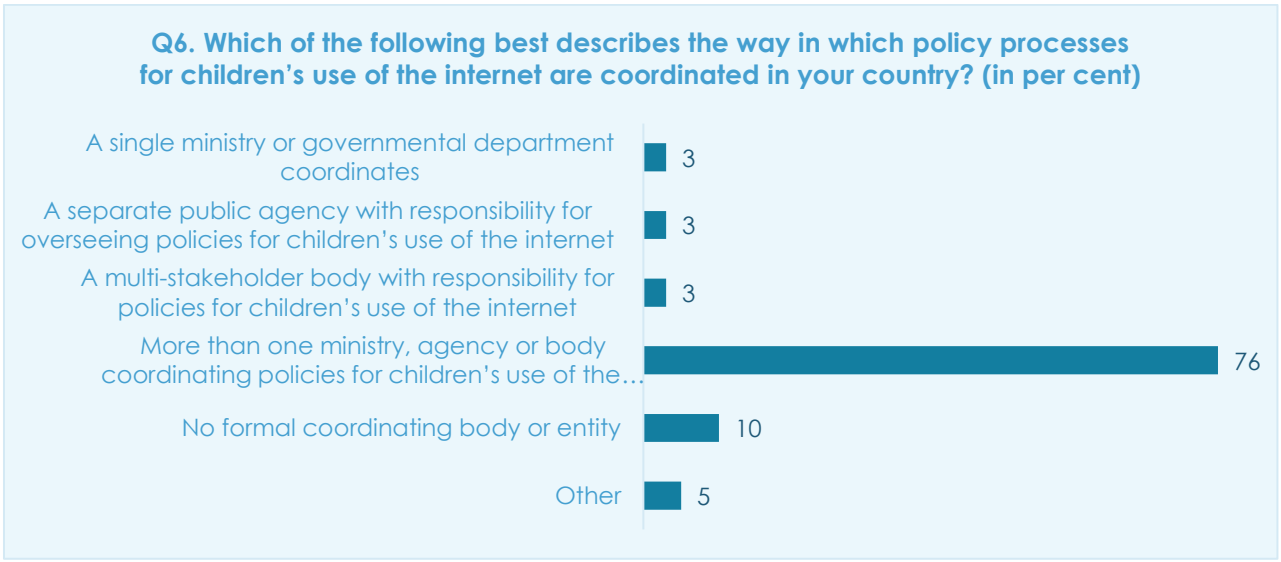
- How policies are managed and coordinated.
- Stakeholder involvement in policy governance.
- The availability of research and evidence to support policy-making.

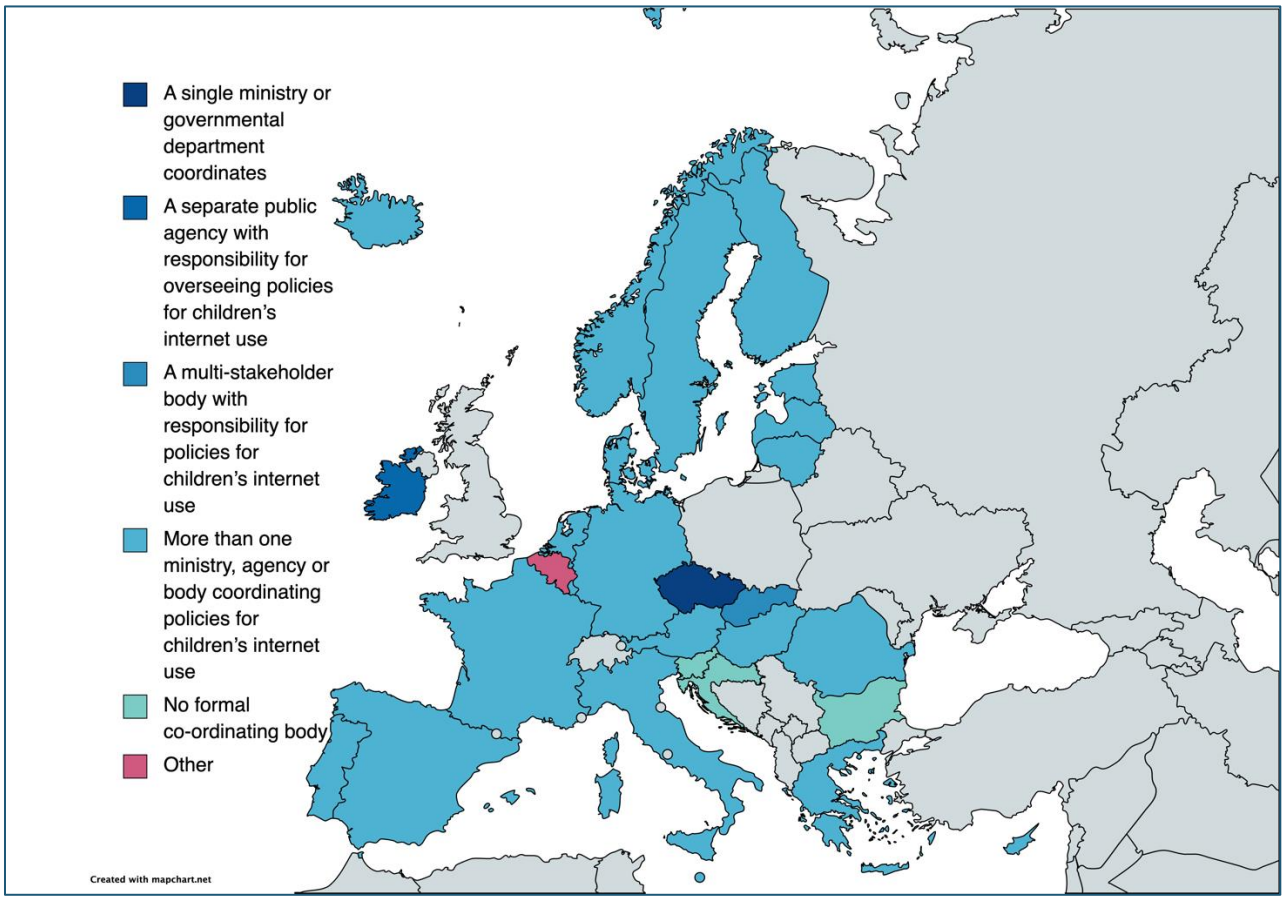
Youth participation in policy-making is considered separately in Chapter 4.

How are policies coordinated?

Countries were asked to indicate how policies on children's internet use are coordinated, e.g., overseen by a single ministry, a separate public agency or multistakeholder body, a number of different government departments, or by more than one ministry, agency or body. The findings are summarised in Figure 4.

Figure 4: Forms of BIK policy coordination in the Member States





As shown in Figure 4, most countries have more than one ministry, agency or body coordinating policies for children's internet use.

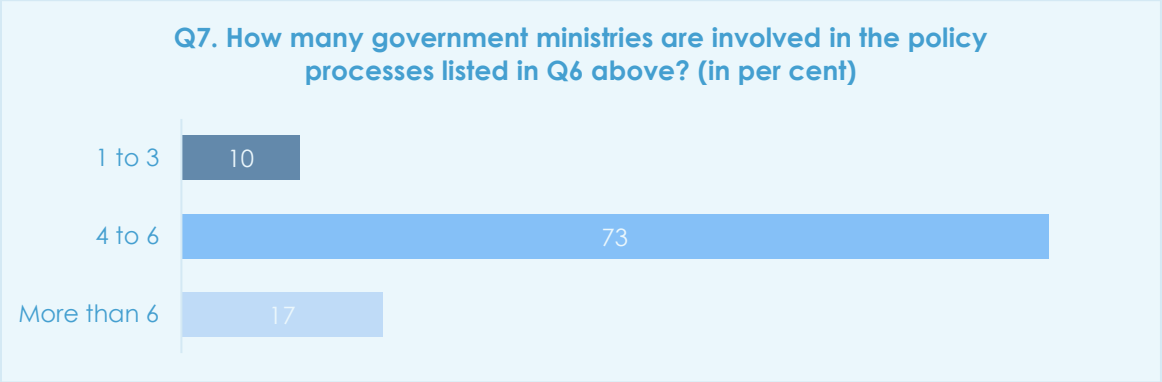
- Three-quarters, or 22 of the 29 countries (in light blue), report multiple bodies involved in the coordination of policies at the national level.

- In just three cases, coordination is undertaken by a single body responsible for BIK policy, whether this is a single government department (as in the case of the Czech Republic), a public agency (in the case of Ireland) or a multistakeholder body with responsibility for coordinating policies for children's use of the internet (Slovakia).
- Three countries – Bulgaria, Croatia, and Slovenia – (shaded in grey) report that there is no formal coordinating body or entity at the national level.
- In the case of Belgium, an alternative coordination mechanism is referred to. This includes a nationwide consortium that reaches across the different parts of the country's federal structure and the different language groups but also has separate coordination undertaken by CSEM and Mediawijs for the French-speaking and the Flemish communities, respectively, based on their regional government mandate.

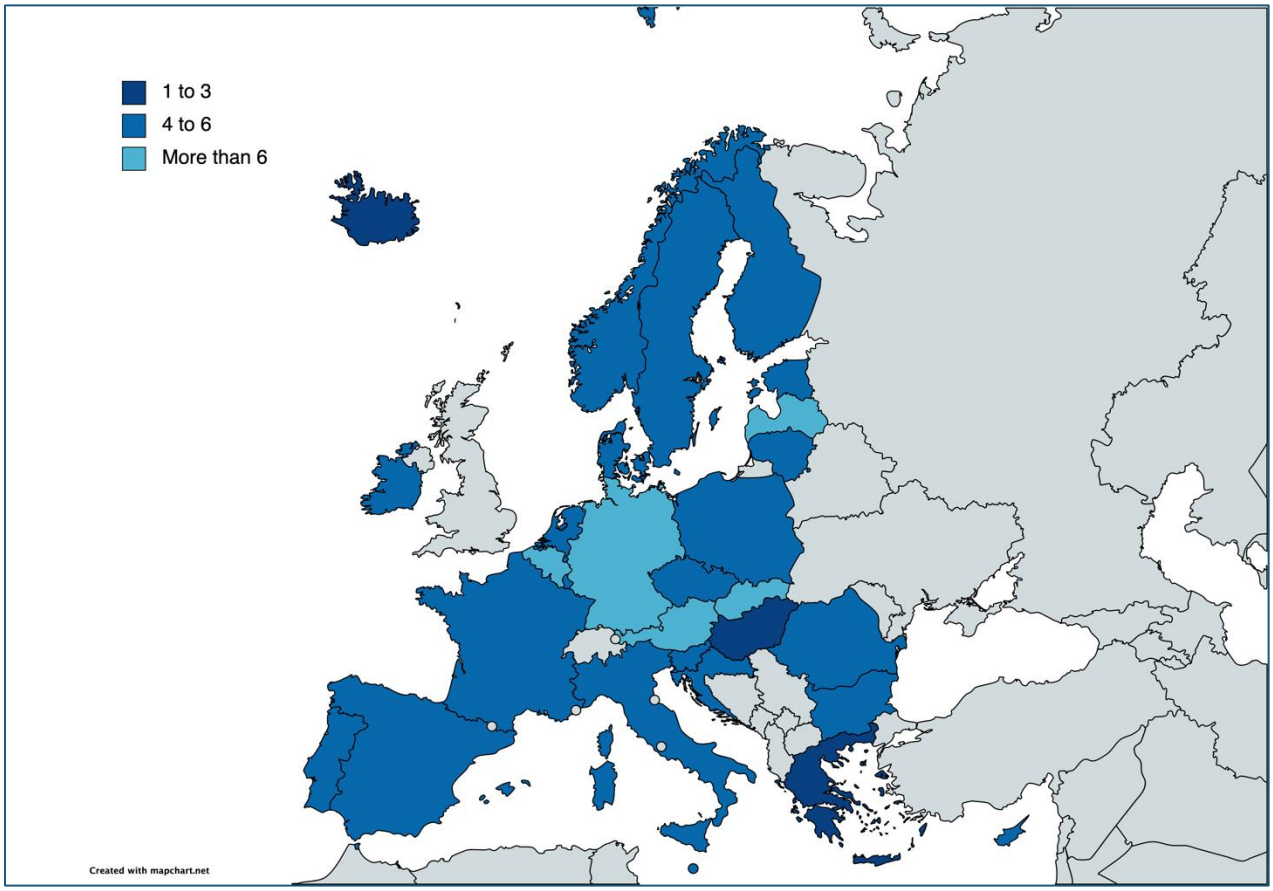
Involvement of ministries

Exploring this issue further, countries were asked to identify the number of ministries involved in policy development across the different strands of BIK-related policies.

***Figure 5**: Number of ministries involved in BIK-related policy-making*



Q7. How many government ministries are involved in the policy processes listed in Q6 above?



In most countries, policy development for a better internet for children involves multiple government departments.

- In 20 of the 29 countries, or 73 per cent (in blue), between four and six government ministries contribute to policy in this area.
- In a further five countries (Austria, Belgium, Germany, Latvia and Slovakia; in light blue) representing 17 per cent of the total, this involves more than six government ministries.
- Just three countries – Iceland, Hungary and Greece (dark blue) – report that between one and three ministries are involved in policy development and policy coordination.

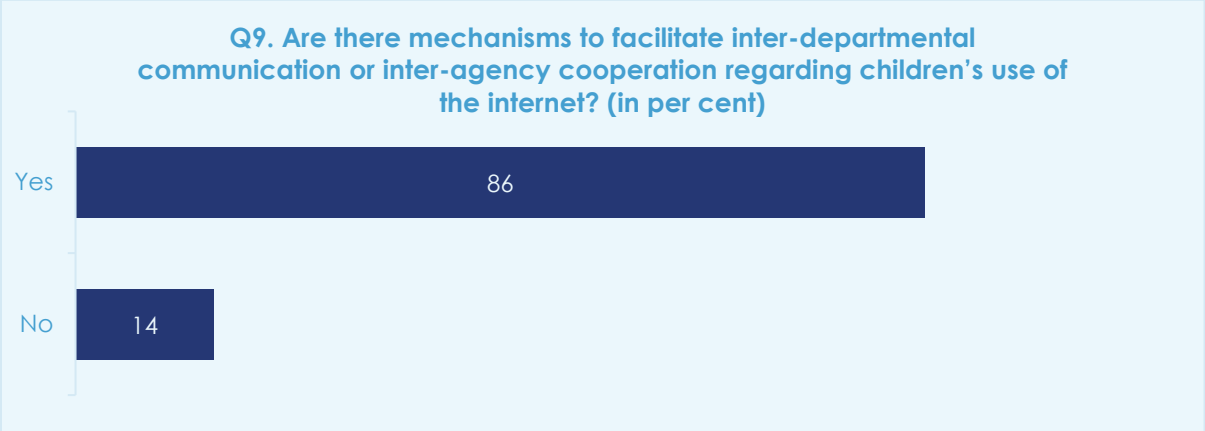
The number of ministries involved in policy development also relates to country size. Larger countries tend to have more ministries involved, while smaller countries are more likely to have fewer ministries, sometimes covering more topics or fields per ministry. Explanations offered by countries provide further insight into the multifaceted nature of policy development in this area, with a number emphasising the importance of ensuring strategic leadership, effective communication and cooperation mechanisms.

- In **Croatia**, the Ministry of Science and Education provides, prepares and implements policies for schools and the whole education system, as well as in the area of safer internet, violence and cyberbullying prevention, and awareness-raising. The Ministry of Internal Affairs works in the area of preventing child abuse. The Ministry of Justice and Public Administration creates criminal law, and the courts sanction the perpetrators.
- In **Finland**, the government ministries are in charge of planning, guiding and implementing the policies within their policy areas. However, practically all policies (as well as their implementation) are made in cooperation with relevant stakeholders and subordinate governmental authorities.
- In **Germany**, government ministries on the federal and state levels are involved in the policy-making processes. The work of the ministries responsible for children and families on the federal and state levels is coordinated by the Council of Youth and Family Ministries (Jugend- und Familienministerkonferenz der Länder – JFMK).
- In **Iceland**, the three ministries have a representative in the Steering Committee of the SIC-IS, as do several other governmental bodies (i.e., the Media Commission, the University of Iceland, The Data Protection Authority, and more), and together are responsible for writing the policy for the SIC-IS. These bodies and ministries regularly consult the SIC-IS on different issues related to children's welfare and education on online matters.
- In **Poland**, a group established by the Ministry of Justice in 2021 includes representatives of government ministries as well as other public institutions and academia who work closely on a national action plan on preventing and combating sexual abuse and sexual exploitation of children following the framework of the WeProtect Model National Response (WeProtect Global Alliance, 2016).
- In **Slovakia**, each ministry works through a nominated person, but such nominees are expected to discuss the policy in their ministries or other subjects. This way, through nominated persons, all policy-making is being implemented – both the strategic documents and the action plans.
- In **Spain**, each ministry promotes the development of public policies over which it has responsibility. Subsequently, it develops the preliminary draft law or regulation based on consultations with organisations and groups involved. Finally, the proposed policy is submitted to public consultation.

Cooperation mechanisms

Given the multiple government ministries and other public bodies involved in policy-making, countries were asked to identify if there were mechanisms to facilitate inter-departmental communication or inter-agency cooperation regarding children's internet use.

Figure 6: Availability of cooperation mechanisms



Most countries – 25 of the 29 in the study or 86 per cent – say there is an inter-departmental communication or cooperation mechanism at the national level. In four cases (Bulgaria, Croatia, Poland, and Spain), or 14 per cent of the total, no such cooperation mechanism is said to exist. This represents a slight reduction from the finding in 2020, where 27 out of 30 countries referred to existing inter-agency cooperation mechanisms.

Examples provided by countries show that cooperation is evenly divided between ministry-level oversight and coordination and mechanisms such as Advisory Boards established by Safer Internet Centres. Selected examples include:

- For the promotion and monitoring of the *National Strategy for a Better Internet for Kids in* ***Cyprus***, an inter-ministerial committee has been established, composed of the Minister of Education and Culture, the Minister of Justice and Public Order, the Minister of Energy, Commerce, Industry, and Tourism, the Minister of Transport, Communications and Works, and the Commissioner of Electronic Communications and Postal Regulations.
- In the **Czech Republic**, a governmental working group – the Czechia in Digital Europe Committee – has been established, with representatives of all ministries, public bodies and stakeholders such as the National Cyber and Information Security Office (NUKIB) or Confederation of Industry of the Czech Republic. The SIC Advisory Board and Youth Panel also contribute in a non-formal way.
- In **Denmark**, most policy is coordinated within the ministries. The Media Council for Children and Young People works with young people, educators, parents, authorities and organisations to inform and advise on children and young people's life and activity in digital media. The Council is a governmental institution and refers to the Ministry of Culture.
- The Advisory Board of the **Greek SIC** brings together state representatives, industry, the academic community and child protection organisations. The Greek SIC cooperates closely with the Ministry of Education and Religious Affairs, the Ministry of Digital Governance and the Ministry of Civil Protection.

- The Communications Regulatory Authority of the **Republic of Lithuania** has formal written agreements with the Police Department and Office of the Inspector of Journalist Ethics concerning the internet hotline operation, where the hotline's operational procedures are thoroughly described. The Advisory Board of the Safer Internet project also acts as a communication channel between stakeholders and the Safer Internet Centre.
- In **Malta**, the BeSmartOnline! project 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.
- In the **Netherlands**, an interdepartmental working group comprises the Ministry of Education, Culture and Science, the Ministry of Health, Welfare and Sport, the Ministry of Economic Affairs and Climate, the Ministry of Justice and Security, and the Ministry of Social Affairs and Employment.
- In **Norway**, the Ministry of Children and Families coordinates policy-making regarding children and online safety and coordinates interdepartmental communication with other ministries. The Norwegian Safer Internet Centre coordinates regular network meetings and has set up an expert group/advisory board with key stakeholders. The Norwegian SIC is also responsible for developing an action plan to implement the strategy for safe digital life for children.
- In **Sweden**, policy-making is coordinated by government assignment to the Swedish Media Council on enhancing media and information literacy by facilitating national cooperation between stakeholders in a network and by carrying out regular mappings.

The 2020 BIK Policy Report noted an increased trend towards a wider distribution of responsibility for policy development and coordination across government departments. This trend has continued on the evidence of the current BIK Policy Map, with most countries counting between four and six ministries involved.

As indicated by the number and range of topics that Member States engage with as part of their policy development, this points to the increasing complexity of BIK-related policy, including, for example, digital education strategy, online safety, privacy and data protection, consumer protection, cybersecurity, audiovisual media services, youth strategy etc. As noted in previous reports of the BIK Policy Map (DIGIWORLD by IDATE et al., 2014), there remains the risk of fragmentation and siloed policy-making where insufficient priority is given to inter-departmental communication and cooperation.

Evidence-based policy

The availability of regular data collection at the national level to support policy development is a further indicator examined by the BIK Map tool. A shared

measurement system is one of the five core elements of the Collective Impact model and is considered important for effective decision-making and for monitoring and evaluating progress.

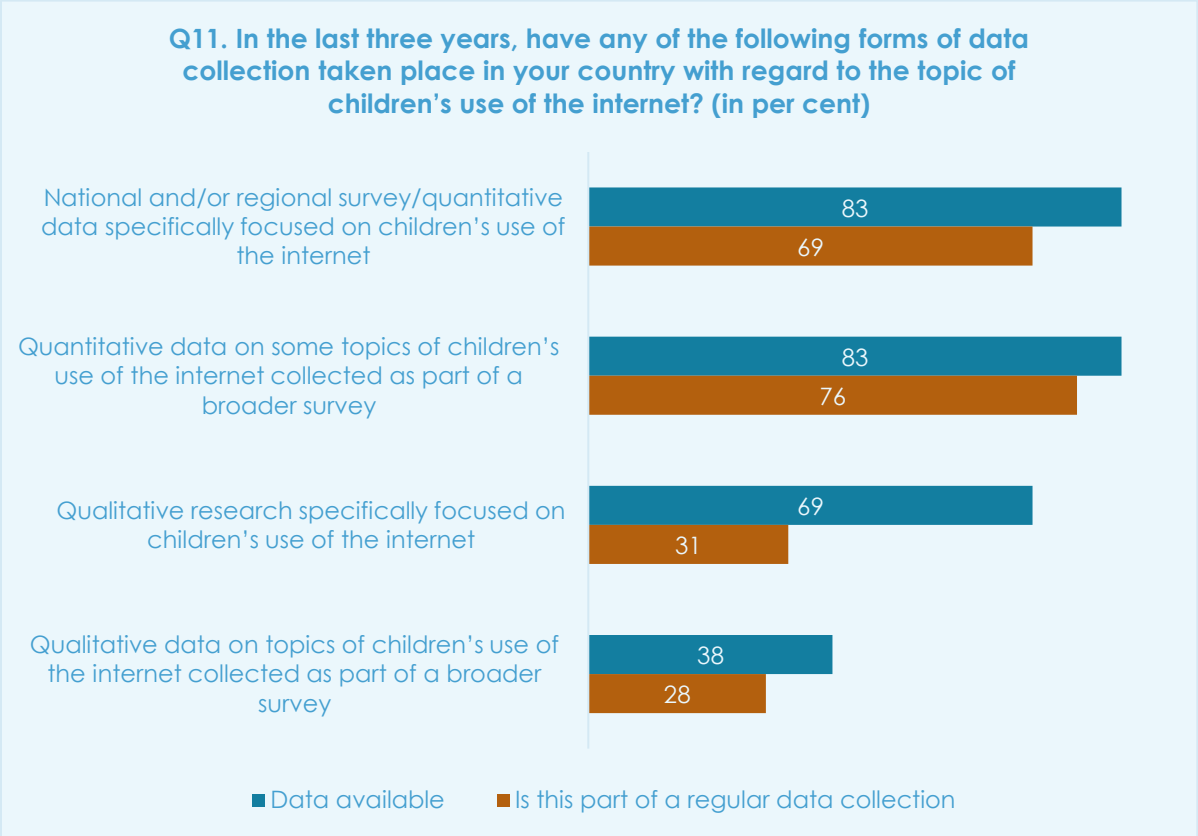
A number of different aspects of evidence-based policy-making are included in the BIK Policy Map. The BIK Map tool includes questions as follows:

- The types of data collection that occur and if this is part of a regular series of national research (Figure 7).
- Evidence collected through such initiatives impacting on policy-making (Figure 8).
- If any evaluation of policies in this area had taken place (Figure 9).
- Any new policy developments occurring in the three years (Figure 10).

Research and evidence to support policy

Figure 7 provides an overview of data collection on children's internet use in the Member States.

***Figure 7**: Availability of evidence on children's internet use*



Findings in this edition of the BIK Policy Map confirm a trend reported in 2020 pointing to the improved availability of research and evidence at the national level. Previous

editions of the BIK Policy Map highlighted the many gaps and uneven nature of data collection on children's internet use. The 2020 BIK Policy Map, however, found a marked increase in the availability of data, with 77 per cent of Member States reporting that national or regional surveys specifically focused on children's use of the internet had taken place.

- 24 out of 29 or 83 per cent of countries report that national or regional surveys of children's online use have been carried out in the last three years. 20 countries, or 69 per cent, say this forms part of a regular series of data collection.
- A similar number also report that children's internet use is collected as part of broader surveys on ICT use.
- The availability of qualitative data is reported by 20 countries or 66 per cent of the total. This is similar to the 2020 finding of 67 per cent. Fewer countries report the regular availability of qualitative studies on children's online use (9 of the 29 countries).

A number of countries refer to the importance of EU-wide comparative research studies such as EU Kids Online (Smahel et al., 2020) and the KiDiCoTi study of children's digital experiences over the course of the COVID-19 pandemic (Joint Research Centre, 2021).

Most research studies cited were, however, national, examples of which include:

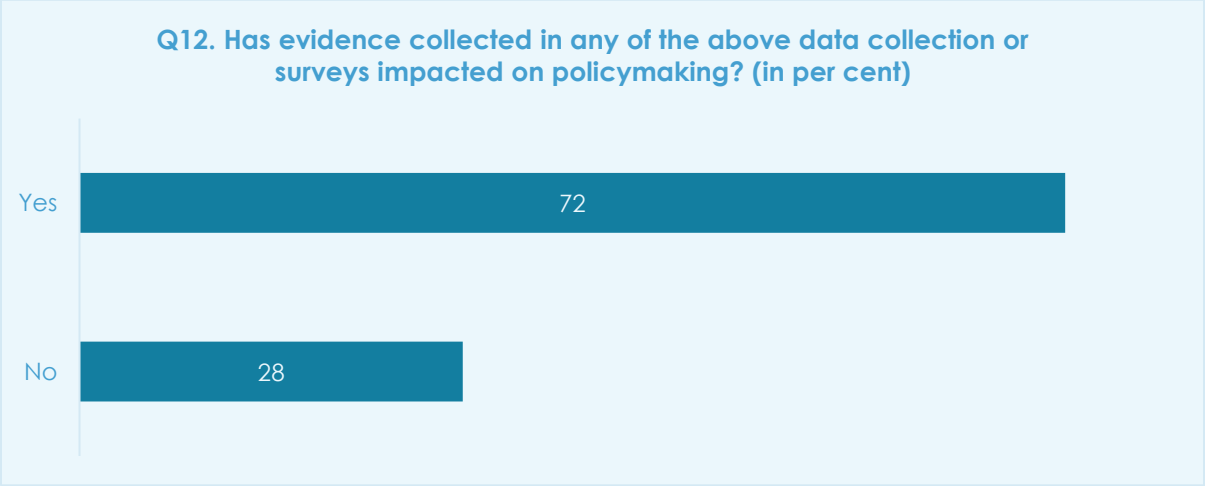
- **Poland:** The Teenagers 3.0 study has been conducted by the Polish NASK centre every two years since 2014. The study of Polish teenagers' experiences regarding activities on the internet is financed under the National Educational Network program, implemented by the NASK National Research Institute under the supervision of the Chancellery of the Prime Minister.[24]
- **Estonia:** A study of attitudes and experiences of sexual abuse of children and young people undertaken by the Justiitsministeerium in Estonia.[25]
- **Ireland:** A study commissioned by Ireland's National Advisory Council for Online Safety in 2020 on the experiences of children, parents and adults of online safety.[26]
- **Germany:** Regular series of quantitative and qualitative studies of children's digital experiences in Germany, including the Shell Jugend study examining 12 to 25-year-olds' behaviour and attitudes.[27]

[24] https://www.nask.pl/pl/raporty/raporty/4295,RAPORT-Z-BADAN-NASTOLATKI-30-2021.html
[25] https://www.just.ee/sites/www.just.ee/files/a_study_of_attitudes_and_experiences_of_sexual_abuse_of_children_and_young_people.pdf
[26] https://assets.gov.ie/204409/b9ab5dbd-8fdc-4f97-abfc-a88afb2f6e6f.pdf
[27] https://www.shell.de/ueber-uns/initiativen/shell-jugendstudie.html

Evidence impacting on policy

Countries were also asked to report if the evidence collected through any of the methods of data collection above had contributed to policy in their country.

Figure 8: Use of evidence in policy-making



Most countries report positively that evidence has influenced policy-making at the national level.

- Three-quarters or 21 of the 29 countries (72 per cent) say that evidence collected at the national level impacts policy-making and has influenced the design of policies.
- Eight countries, or 28 per cent of the total, say this is not the case and that data collection has not impacted policy-making.
- There is a small decrease since the last 2020 BIK Policy Map report in the number of countries who say that evidence collected at the national level has contributed to policy in their country. In the last report, 24 out of 30 countries stated that research evidence contributed to national policy-making.

Some examples provided by countries of evidence contributing to BIK-related policies include the following:

- In **Belgium**, data on grooming, sextortion and problematic sexting made the policymakers change the criminal code to make these crimes specifically illegal.
- In the **Czech Republic**, findings of the Centre for Prevention of risky virtual communication research, Palacký University in Olomouc, were implemented into methodological guidelines for education by the Ministry of Education, Youth and Sports.[28]

[28] http://www.msmt.cz/vzdelavani/socialni-programy/metodicke-dokumenty-doporuceni-a-pokyny

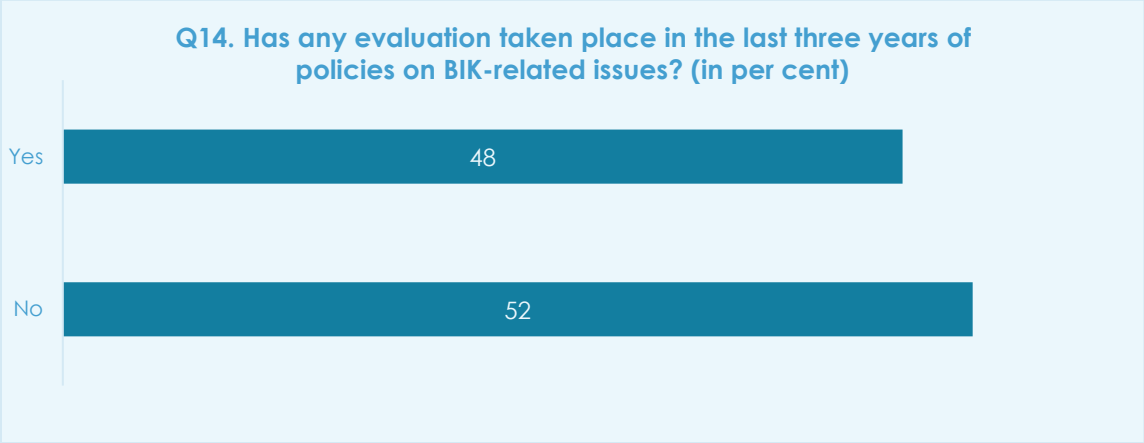
- In **Finland**, the School Health Promotion survey has been used as one of the most significant references for the Childhood Without Violence Action Plan.
- In **Germany**, the amendments to the Jugendschutzgesetz (JuSchG; Youth Protection Act) include references to the following studies: Jugendmedienschutz-Index; KIM-Study; JIM-Study; DIVSI-U25-Study, Speak-Studie 2017.
- In **Ireland**, research commissioned by the National Advisory Council for Online Safety was undertaken to create an up-to-date, reliable evidence base at the national level regarding risks and harm online for children and adults alike.
- In **Norway**, both the *Children and Media* and the *EU Kids Online* surveys are important references in support of several White papers and policy-making processes and forming the basis for different actions and tools developed.
- In **Poland**, the preparation of the draft Act on the Protection of Minors from Access to inappropriate content on the internet, which requires Internet providers to implement a mechanism allowing for the blocking of access of children to pornographic content and also helps parents and guardians to restrict access to pornographic content, was presented together with the NASK report "Teenagers in the face of digital pornography".[29]
- In **Slovenia**, in order to assist evidence-based policy-making, statistical data plays an important role. Evidence collected through Eurostat etc. strongly contributes to policymakers creating new policy proposals and is often the subject of further policy debates.
- In **Spain**, the different bodies with responsibilities in this area follow up on the various published reports and studies, which in turn tend to be widely covered in the Spanish media, such that all these issues influence the development of policies when the data shows evidence of risks and problems when minors use the internet.

Evaluation of policies

Countries were also asked to report if BIK-related policies had been evaluated in the last three years.

[29] https://akademia.nask.pl/badania/2022-nastolatki-a-pornografia-badania.pdf

Figure 9: Evaluation of policies in the last three years



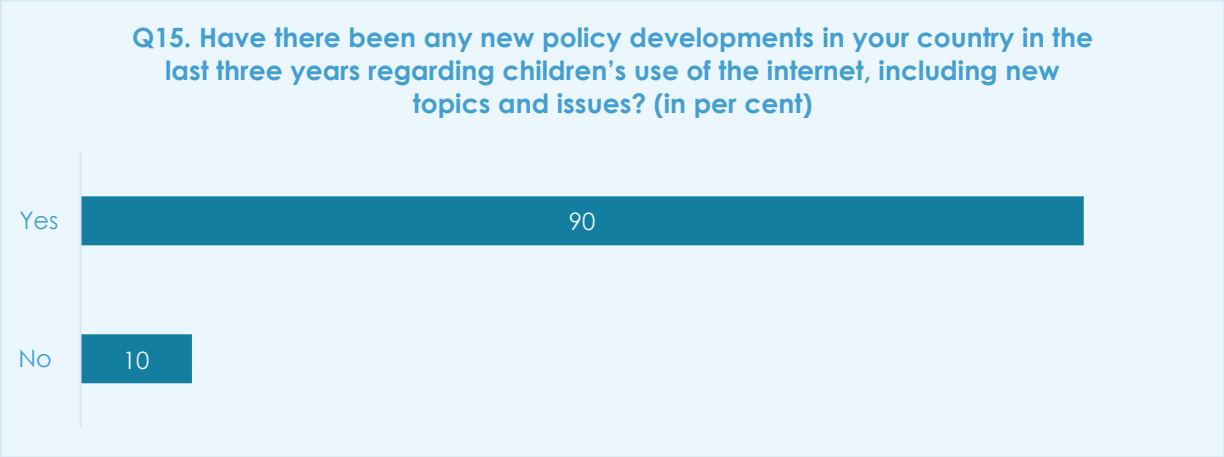
Just under half, or 14 of the 29 participating countries, say that BIK-related policies have been evaluated in the last three years. There has been no change since the 2020 BIK Policy Map on this indicator.

Evaluations reported to have taken place include evaluations of Safer Internet Centre activities, ongoing evaluation of education policies, and regulatory impact assessments for new policy proposals. Major policy initiatives relating to children, such as a national children's strategy, are reported to undergo continuous evaluation through the preparation of national reports to the UN Committee on the Rights of the Child. However, there were relatively few references to evaluations focusing on children's experiences of online risks and safety.

New policy developments

Finally, countries were also asked to note whether any new developments had occurred at the national level since the last survey in 2020, as shown in Figure 10.

Figure 10: New policy developments



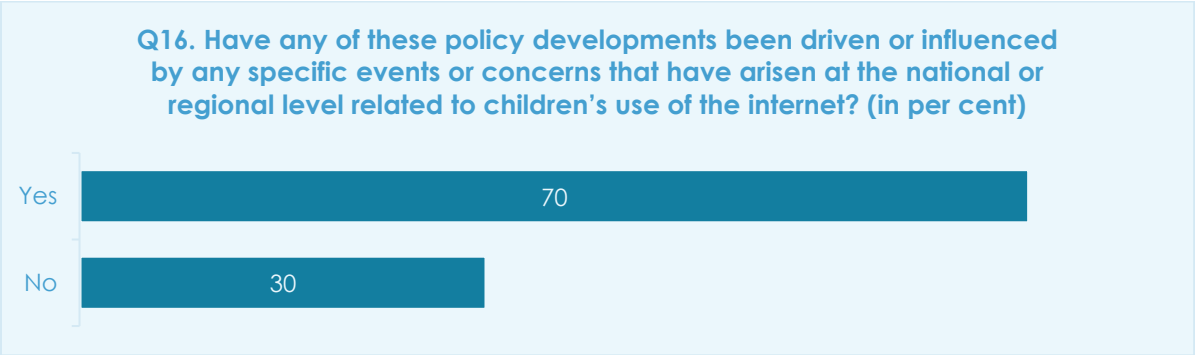
The majority, 26 of the 29 countries, confirmed that new policy developments, including new topics and issues, have taken place in the area of children's online use. This continues a trend noted in the 2020 report and confirms that policies contributing to a better internet for children continue to grow in scope and number.

Examples cited by countries include some of the following initiatives:

- In **Austria**, media and information literacy were formally incorporated into the national youth strategy.
- In **Belgium**, a complete revision of the sexual criminal law was undertaken.
- A new criminal law procedure involving cybercrime was enacted in the **Czech Republic**.
- In **Germany**, the amendment of the Youth Protection Act was undertaken in 2021 with a child rights-based approach to the protection of minors in the digital environment.
- In **Ireland**, the enactment and commencement of the Online Safety and Media Regulation Act 2022 took place, along with the establishment of a new multi-person media commission (to be known as 'Coimisiún na Meán').
- In **Italy**, the definition of cyberbullying was incorporated into the legal system.
- In **Lithuania**, the subject of child online safety was incorporated into the Law on Fundamentals of Protection of the Rights of the Child.
- In **Norway**, a national action plan to combat problem gaming was developed.
- In **Poland**, a digital competence development programme was created.
- In **Portugal**, a national plan was created to prevent and combat cyberbullying in schools.

Countries were also asked to comment if such policy developments had been driven or influenced by any specific events or concerns that had arisen at the national level.

***Figure 11**: Policy responding to national concerns*



20 of the 29 countries, or 70 per cent, say that policy developments are in part a response to specific events or concerns at the national level.

Countries under this heading provided a variety of explanations.

- The impact of the COVID-19 pandemic on youth was noted in comments from **Slovakia**, **Slovenia**, and **Estonia** and featured more generally across many of the support activities reported in the submissions. In **Germany**, concerns about children's equal access to digital technology were raised during the COVID-19 pandemic. In **Denmark**, there was growing political attention to children's well-being online and the resultant responsibility of social media providers.
- Concerns about the exploitation of nude and explicit images among younger users were highlighted as key concerns in national policy debates in **Germany**, **Norway** and in **Spain**. Both **Austria** and **Belgium** referred to legislative reform regarding the sharing of explicit images, including non-consensual sharing or so-called revenge porn.
- Concerns about access by children and youth to online pornography online were noted in **Poland**, while in the **Czech Republic**, there was a more general debate about child sexual abuse and grooming on the internet.
- Bullying and cyberbullying in schools featured as an important issue of policy debate in **Italy** and **Portugal**, where a number of new initiatives were launched.
- Concerns about the need for a more systematic approach to strengthening digital skills and media literacy were reported by **Croatia** and **Luxembourg**, while disinformation and radicalisation through extremist content online were topics of debate in **Germany**.

Summary

Main changes and trends

- **The fourth BIK Policy Map findings show that children's internet use continues to be an important policy topic, with all countries developing new policies in this area.** EU Member States, Iceland and Norway say that the BIK strategy, including the updated BIK+ strategy, has been influential nationally. This edition of the BIK Policy Map finds an increase in the number of countries reporting that the BIK strategy has influenced their policy development.
- **There is also evidence of continued fragmentation in how policies are coordinated nationally.** This is partly due to the multi-dimensional and sometimes siloed nature of BIK-related policies, which cover various issues from platform regulation to education and youth participation. However, it also highlights continued gaps in the availability of coordination mechanisms between the various stakeholders contributing to policies on the subject of children and the digital environment. It is also noteworthy that very few examples of integrated policy frameworks cover BIK-related policy at the national level.

- **The situation regarding evidence-based policy-making at the national level shows some improvement.** It will be important to continue to track this as policy is increasingly implemented on an EU level, with the concern that it may weaken the rationale for national surveys in the BIK field.
- **Nearly three-quarters of countries report that policies are still driven by specific events discussed in national societies.** In this context, it is also important to avoid disjointed policy efforts in the different topics covered under BIK and that further efforts are made to align policies around the BIK+ strategy themes of safe digital experiences, digital empowerment and active participation.

Areas for further exploration

- **The effects of new EU legislation are as yet unknown and may either consolidate competencies or conversely lead to an overall decline of policy-making and coordination at the national level due to less emphasis on national policies**. This will need to be monitored in future editions of the BIK Policy Map.
- **Effects of further Europeanisation of BIK-related legislation are to be seen,** such as updates to national legal frameworks, the withdrawal of certain national laws and policies to comply with EU legislation, and the implementation of coordination and enforcement mechanisms and bodies, for example, with regard to Art. 28 AVMSD.
- **The types of policy coordination that are applied at the national level and whether, for example, it is person-dependent, organisation-dependent or work-form-dependent.** The country-specific dynamics associated with developing better internet policies need to be further studied, for example, in further case studies of the impact of the BIK+ strategy.
- **The impact of enhanced awareness of children's rights in the digital environment is also an important area for further exploitation regarding policy development**. With the adoption of General Comment No. 25 in 2021 (UN Committee on the Rights of the Child, 2021), the primacy of the best interests of the child (UNCRC Art. 3) has been strengthened in policies contributing to a better internet for children. Accordingly, policy frameworks and policy-making processes should reflect a rights-based approach.

Chapter 2: Safe digital experiences (Pillar 1)

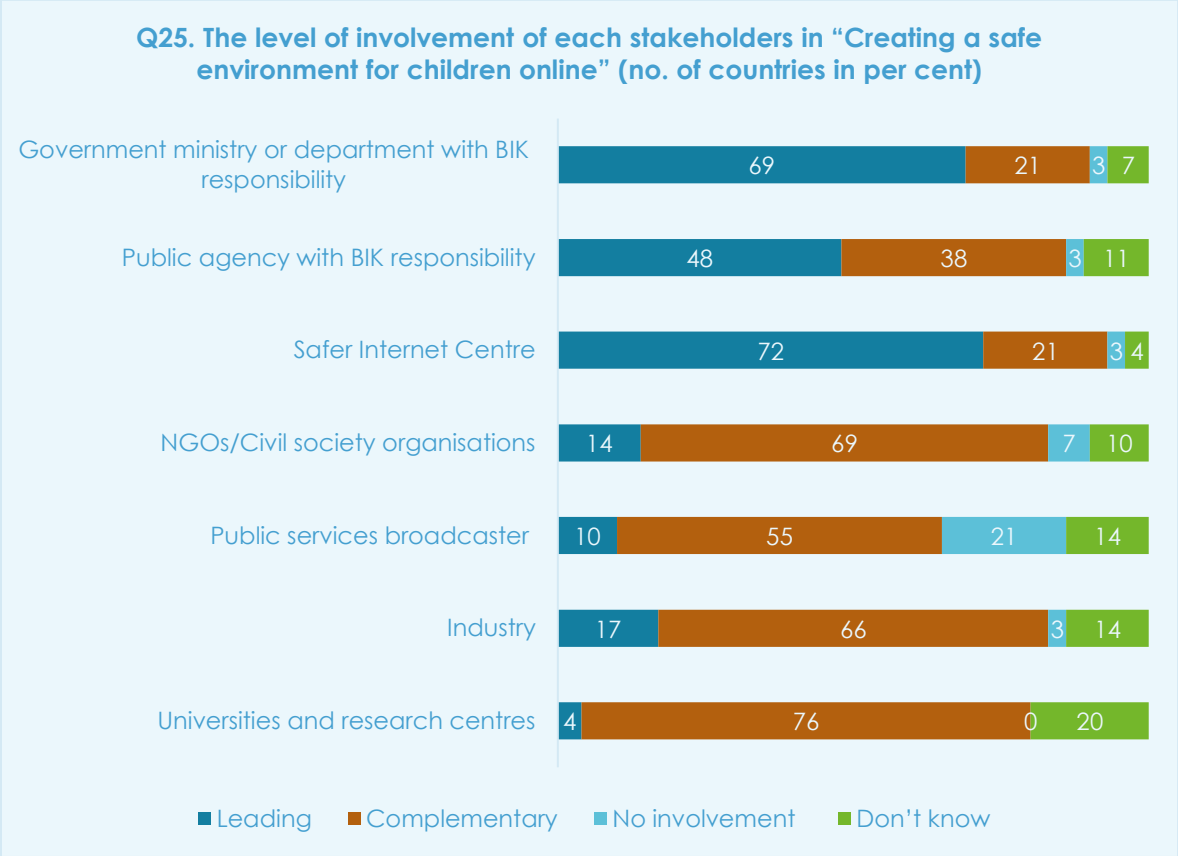
Pillar 1 of the BIK+ strategy focuses on protection and refers to safe digital experiences and actions to better protect children online. Pillar 1 encompasses initiatives and activities on the part of the Commission, Member States, NGOs and industry to protect children from harmful and illegal online content, conduct, contact and contract/consumer risks and to improve their well-being online through a safe, age-appropriate digital environment, created in a way that respects children's best interests (European Commission, 2022, p. 9).

To update the BIK Policy Map to align with the new approach, indicators from the original BIK strategy (*Creating a safe environment for children online*) are used to provide a baseline of policies and activities in the Member States contributing to safe digital experiences. Additional indicators will be developed in future editions as policy evolves in this area. To provide additional context, indicators from the original BIK strategy – *Fighting against child sexual abuse and child sexual exploitation*, are also included in this section of the report, though this line of activity is no longer part of the BIK+ strategy.

Who leads in delivering this pillar?

Countries were first asked to identify the level of stakeholder involvement in supporting actions to create a safe environment for children online. A leading role in policy implementation is defined as *being formally tasked or responsible on a statutory basis* for activities in this pillar, while a complementary role is defined as having *an active interest, engagement and involvement* in this area.

Figure 12: Stakeholder involvement in creating a safe environment for children online (Pillar 1)



Overall, there is relatively little change in the profile of leading policy actors in Pillar 1 – *safe digital experiences* since the last BIK Policy Map in 2020.

- The leading role in carrying out the most relevant or significant activities in this pillar is shared between government ministries (69 per cent), public agencies with responsibility for BIK-related issues (48 per cent) and Safer Internet Centres (72 per cent).
- These options are not mutually exclusive, however. As such, leadership in this pillar is shared between government ministries, public agencies acting on their behalf at the policy level, and Safer Internet Centres. Notably, nearly three-quarters of all countries say that Safer Internet Centres have a leading role in policy implementation at the national level.
- NGOs and civil society organisations play a complementary role in most countries. In four cases – Denmark, Finland, Portugal and Sweden – NGOs are also said to play a leading role.
- Other stakeholders are strongly represented as complementary actors in contributing to safe digital experiences. Universities are identified as complementary actors in three-quarters of all countries. Industry is identified as a complementary actor in 66 per cent or 19 out of the 29 countries. In five cases (17 per cent), industry is said to have a leading role.

As elaborated in some of the explanations provided by countries, there is a distribution of responsibility among different actors at the national level – primarily the relevant government ministries, public agencies and SICs – in accordance with local arrangements. This suggests a collective effort consistent with the involvement of multiple departments and agencies identified in the previous section.

Commenting as to why SICs are identified as leading in this area, for example, the observations from the Netherlands, Portugal and Malta provide the following insights:

- [The] Safer Internet Centre is leading in creating a safe environment, co-financed by EC, Ministries and privacy partners, who all play their role. (**Netherlands**)
- [The] Safer Internet Centre, through its members, are the main players in creating and providing awareness sessions on different topics. Also, the Safer Internet Helpline is the only helpline in the country responsible for giving support to children regarding different subjects regarding online safety. (**Portugal**)
- The Safer Internet Centre is led by the Foundation for Social Welfare Services, which is also the same that provides the service of the hotline and helpline thus, the level of involvement of the SIC is holistic. (**Malta**)

More generally, comments from national contacts point to the distinct but complementary responsibilities that apply to ministries, public agencies and SICs, the combination of which is regarded as vital to contributing to safe digital experiences. For example:

- In **Norway**, government ministries are responsible for ensuring efficient regulation for protecting children online. Audiovisual media services and the industry are responsible for complying with the regulation. Public Agencies like the Media Authority, the Consumer Authority and the Data Protection Authority are responsible for supervising the industry's compliance with the legislation. In addition, there are initiatives from other stakeholders to provide information about age-appropriate privacy settings and the use of parental control.
- In **Estonia**, the ministries are responsible for developing relevant strategies and action plans and providing funding for implementation. Public agencies and private law organisations (NGOs) provide services (training, resources, assistance) and are responsible for the quality of their services. Industry is interested in increasing awareness for the safe and secure use of the internet, and therefore they are taking part in developing relevant resources and providing technical solutions. Universities take part in developing resources as well as carrying out research.
- The Communications Regulatory Authority of the **Republic of Lithuania** (RRT), with the hotline and Safer Internet Centre, lead in creating a safe environment for children online. Other institutions play a complementary role in this field.

- In **Sweden**, there are various ministries dealing with these issues: the Swedish Media Council, the Swedish Data Protection Authority, the Ombudsman for Children in Sweden, the Swedish Consumer Agency, and the Swedish Press and Broadcasting Authority.

Comments from countries also called attention to the fact that increasingly policy actions in this area take place at the EU level and that the responsibility of national actors is to implement EU-wide policy in such areas as the protection of minors on video-sharing platforms (AVMSD) and data protection (GDPR).

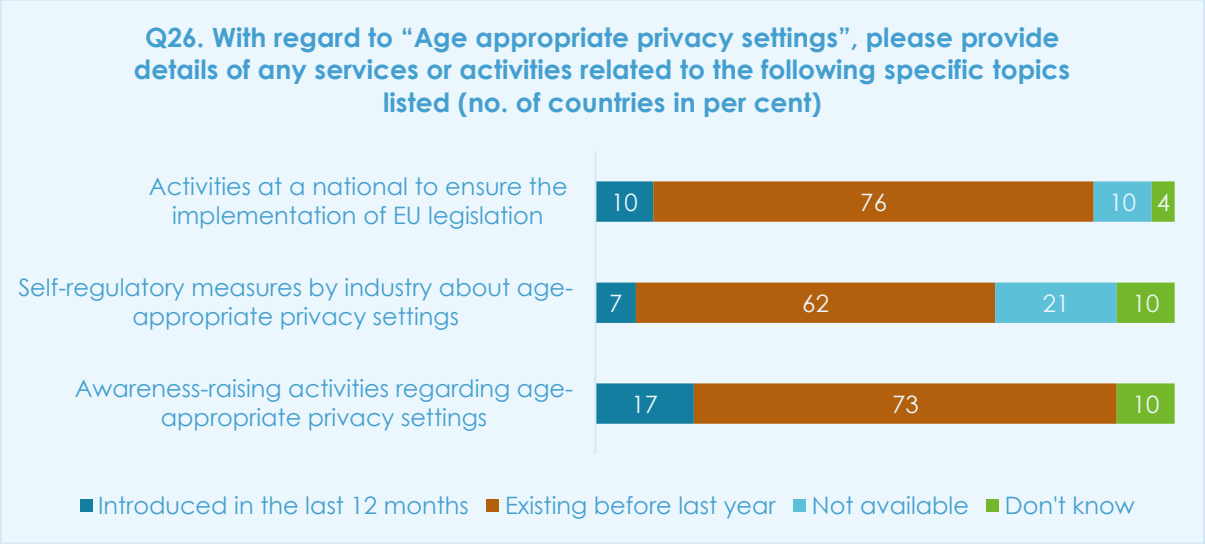
Age-appropriate privacy settings

The original BIK strategy referred to measures to support children's online privacy through the industry's implementation of transparent age-appropriate privacy settings by default. Member States were asked to ensure the implementation of relevant EU legislation, encourage further adoption of self-regulatory measures, and foster greater awareness about privacy risks.

In the BIK+ strategy, such measures are incorporated within the overarching commitment at the Commission level "*to facilitate a comprehensive EU code of conduct on age-appropriate design, building on the new rules in the DSA and in line with the AVMSD and GDPR*" (p.9) with the aim of ensuring the privacy, safety and security of children when using digital products and services. According to the Commission, such a code would be co-regulatory in nature and involve industry, policymakers, civil society and children.

For this edition of the BIK Policy Map, countries were offered the opportunity to update information using the original formulation of the question which referred to activities nationally to support awareness-raising regarding age-appropriate privacy settings, self-regulatory measures by industry, and activities to support the implementation of EU legislation. Additional information was provided as required.

Figure 13: Activities to support age-appropriate privacy settings



- The majority of countries (76 per cent) report existing activities to support the implementation of EU legislation. A further three countries, or 10 per cent, have introduced new actions in the last twelve months.
- Nearly all countries report awareness-raising activities regarding age-appropriate privacy settings. Again, in three-quarters of countries, these existed before the last year.
- 20 countries also say industry self-regulatory measures about age-appropriate privacy settings are in place. Six countries, or 21 per cent, say self-regulatory measures are unavailable.

The 2020 BIK Policy Map found a marked increase in activity in this area following the coming into force of the General Data Protection Regulation (GDPR). This level of activity has been maintained in the current report. This is supported by some of the comments from the Member States noting continuing investment and activities to support awareness of privacy and data protection.

- The submission from **France**, for instance, observed that GDPR and other legislation, such as AVMSD, impacted the industry's attitude towards child protection with social media platforms introducing new products and services aimed at families.
- In **Ireland**, the Data Protection Commission extensively consulted with children to prepare its guidance document, *Fundamentals for a Child-Oriented Approach to Data Processing* (Data Protection Commission, 2021).
- In **Germany**, the draft CSA Regulation of May 2022 has initiated a fresh debate on social media surveillance ("#Chatkontrolle"), age verification and age-appropriate privacy, though no national strategy has been communicated as of the end of March 2023. With regard to self-regulatory measures by industry about age-appropriate privacy settings, one of Germany's co-regulatory bodies, FSM, is in dialogue with the industry, but

there is no information available on recent developments. FSM also addresses the issue in its Jugendmedienschutzindex.[30]

- In **Poland**, in January 2022, the Polish hotline (Dyżurnet.pl) operating at NASK published the report *Mobile applications – are our children safe?*[31] Aimed at parents, educators and carers of children and teenagers, as well as developers of mobile applications, for whom it can be a basis for creating applications that are safe at the design level in the future, the purpose of the report was to highlight general potential threats and safety rules for the use of mobile applications by children and youth.
- In **Sweden**, three government agencies with special responsibility for protecting children and young people and strengthening their rights developed joint guidance for stakeholders focusing on the implementation of the GDPR and the UN Convention on the Rights of the Child (UNCRC), with reference also to the legislature's intentions to protect children from harmful media influence and content.[32]

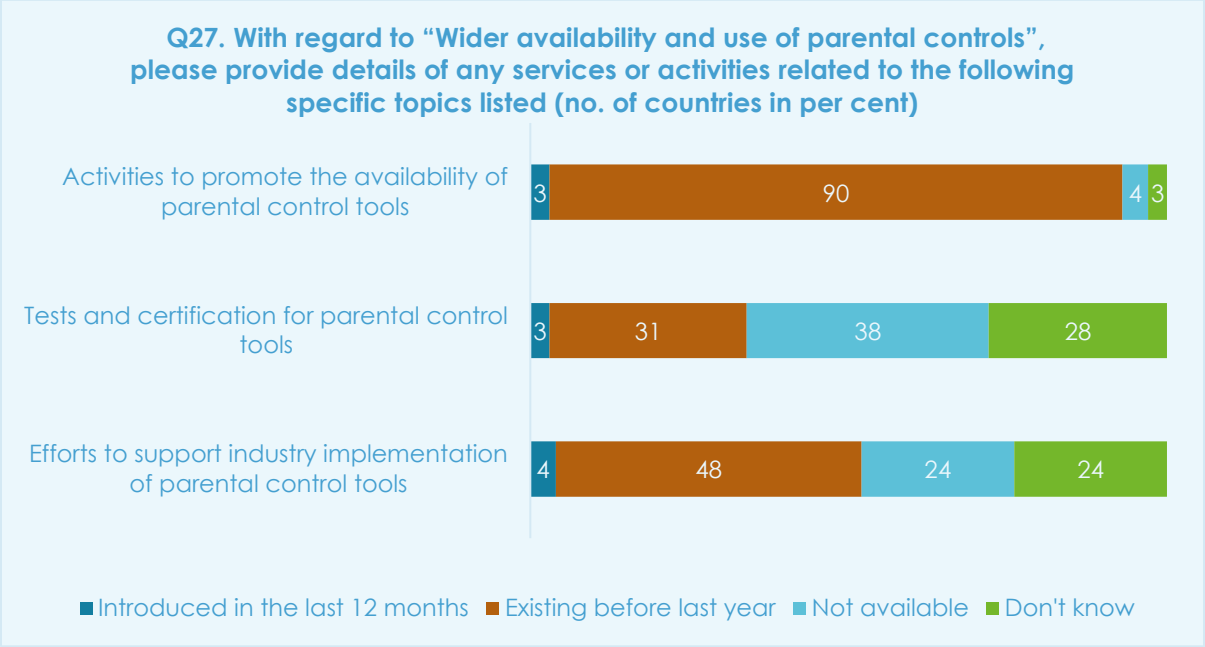
Wider availability of parental controls

The wider availability and use of parental controls was recommended in the original BIK strategy as a complementary measure that can contribute to online safety by restricting children's access to inappropriate content. As a long-advocated solution, parental controls continue to feature in the offering of internet service providers both as technology to support parents and carers in supervising their children's internet use and, increasingly, as parental companion apps that facilitate parent-child dialogue in the use of digital services. The BIK+ strategy refers to the provisions in the Digital Services Act whereby very large online platforms will be required to adopt measures, including the use of parental control tools to protect children from risks of exposure to content that may be harmful for their development (European Commission, 2022, p. 6).

The BIK Map questionnaire asks if parental controls continue to feature in the policies and activities of Member States. Countries were asked to indicate the extent to which there are activities at the national level to promote the availability of parental controls, tests and certification of parental controls, or activities to support industry implementation of parental controls.

[30] https://www.fsm.de/fsm/jugendmedienschutzindex/
[31] https://dyzurnet.pl/uploads/2022/08/Mobile-applications.pdf
[32] See: *The rights of children and young people on digital platforms: Stakeholder guide.* Available at: https://www.imy.se/globalassets/dokument/rapporter/the-rights-of-children-and-young-people-on-digital-platforms_accessible.pdf

Figure 14: *Activities to support wider availability and use of parental controls*



As shown in Figure 14, parental control tools remain important in online safety awareness activities.

- All but two countries in the BIK Policy Map state that there are activities to promote the availability of parental control tools. Most of these are described as existing since last year, with one country (Spain) reporting new activities in this area in the last twelve months. Just one country (Denmark) states that there are no activities at the national level to promote the availability of parental controls.
- Tests and certification for parental control tools are less widely available and are stated as being present in just one-third of countries.
- Nearly half of the countries, or 48 per cent, reported that activities were in place to support industry implementation of parental control tools.

The profile of activities reported by countries regarding parental control tools is similar to earlier BIK Policy Map reports. Indeed, activities to promote the availability of parental controls are among the most widely reported online safety measures, despite the fact that their use remains uneven and their effectiveness the subject of continuing debate (Smirnova et al., 2021).

Some of the following comments provided by countries help to provide an insight into the nature of support at the national level for parental controls:

- In **Bulgaria**, the availability of parental control tools such as Family Link, TikTok, Facebook, or Snapchat settings has been publicised and recommended mainly by the SIC.

- Actions in **Croatia** include SIC testing of existing applications and recommendations to parents, encouraging awareness of the importance and usefulness of parental control apps.
- In **France**, the government launched the *Jeprotegemonenfant.gouv.fr* website in 2020 to raise parents' awareness of children's exposure to offensive content and the use of parental controls. The three services of Safer Internet France are partners in this programme. In September 2022, a law was passed to make it compulsory to install a parental control tool by default on devices connected to the internet.
- In **Germany** in 2022, a draft amendment of the Interstate Treaty on the Protection of Minors in the Media was published, focussed on technical instruments for child and youth protection on the operating system level.[33] FSM evaluates programs to protect children who use the internet, e.g., JusProg. FSM does not have a leading role regarding the development of parental control tools of its members, but FSM is in regular exchange with providers.[34]
- In **Greece**, the SIC tries, through its information portal, events and webinars, to keep parents updated concerning existing parental control tools and software. In parallel, the Greek SIC promotes specific guides which rank the existing software depending on its efficiency, security, price, etc.
- In **Lithuania**, the Communications Regulatory Authority (RRT) publishes information about parental control tools and parents' involvement in [their children's] safety on the internet. RRT is responsible for the testing and approbation of filtering software to be installed in public places where minors can be presented, i.e., libraries, computer classes in schools, internet cafes, etc.[35]
- The **Norwegian Media Authority** supervises the industry's compliance with the regulation related to the protection of minors against harmful audiovisual programmes. One of the requirements is that service providers under Norwegian jurisdiction shall offer measures that can be activated by a guardian to protect children against harmful content (i.e., parental control). The Media Authority supports the industry in fulfilling these requirements by pointing out violations and guiding how best to implement tools for protecting minors.

Age rating and content classification

Age rating and content classification form part of the original BIK strategy to protect children from exposure to inappropriate content. Building on the success of initiatives

[33] https://www.rlp.de/de/regierung/staatskanzlei/medienpolitik/rundfunkkommission/reform-des-jugendmedienschutz-staatsvertrages/
[34] https://www.jugendschutzprogramm.de/
[35] Law on the Protection of Minors Against the Detrimental Effect of Public Information, Article 7, part 4. https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.363137?jfwid=rivwzvpvg

such as PEGI and PEGI Online,[36] the BIK strategy recommends that industry implement an equivalent system. Member States are asked to support the adoption of such initiatives and to introduce a complaints-handling system for the effective functioning of such systems.

The updated BIK+ strategy approaches this in a different way. The vision of the BIK+ strategy is for age-appropriate digital services, with no one left behind and with every child in Europe protected, empowered and respected online (European Commission, 2022, p. 9). A comprehensive EU code of conduct on age-appropriate design is envisaged, building on the rules of the DSA and in line with AVMSD and GDPR. The BIK+ strategy also invites industry to implement measures, including through the use of age verification to limit access to age-restricted content, including adult-content websites and 18+ games, in line with national and European rules (p.12). The 2018 revision of the AVMSD likewise introduces new rules on the protection of minors for video-sharing platforms, a feature which is also reflected in submissions from countries to the BIK Policy Map.

Using the original question in the BIK Map tool, countries were asked to indicate if there were activities at the national level to promote age rating and content classification, and if there was a complaints process for the effective functioning of such systems.

***Figure 15**: Activities to support wider use of age rating and content classification*

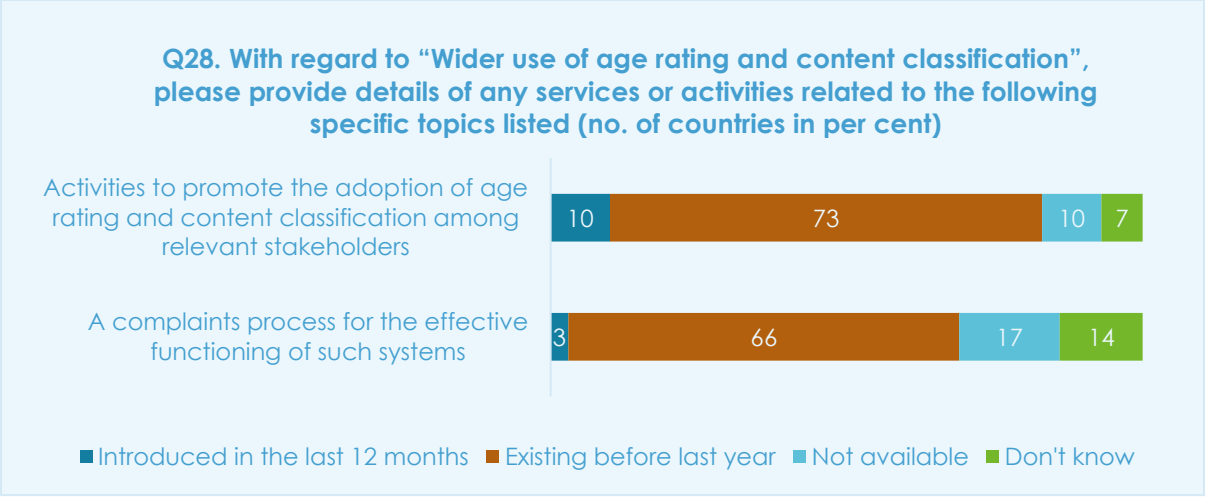


Figure 15 shows that age rating and content classification are important activities for most countries.

[36] https://pegi.info/page/pegi-online

- 24 of the 29 countries, or 83 per cent of the total, report activities to promote the adoption of age rating and content classification. 73 per cent say these existed before last year. In three cases or 10 per cent, these had been newly introduced in the last 12 months.
- 20 countries, or 69 per cent of the total, also report the availability of a complaints process to support the effective functioning of such systems.
- These findings are in line with the 2020 BIK Policy Report in which increased activity was noted in this area, particularly with regard to the transposition of AVMSD into national legislation.

The principal activities encompassed by this action include national regulatory measures associated with the labelling of broadcast and on-demand video content and awareness-raising, typically undertaken by SICs with regard to labelling systems such as age labels for video games. Again, some of the comments provided by countries provide further context regarding provision at the national level:

- In **Denmark**, as part of implementing the AVMS Directive, the Danish Film Classification model has been enforced for broadcast television and on-demand audiovisual services in Denmark.
- In **France**, the last Centre National du Cinéma (CNC) report on this issue included exploring the possibility of creating a single all-encompassing classification scheme for all content (films, TV, video games).[37]
- In **Germany**, the Federal Youth Protection Act amendment contains specific content classification regulations. As of 2021, content classification shall not only be based on the content of the media itself but also on risks elicited by communication and interaction of users. For games and movies sold in stores, giving information on potentially harmful functionalities in the service, application or game is now obligatory. FSM eV offers an age rating system for harmful content while FSM and eco – Association of the Internet Industry eV operate the complaints system for same.[38] Jugendschutz.net also offers a complaints system for reporting violations of youth protection regulations.[39]
- In **Slovenia**, even though the use of the system for age ratings and content classification (Gledoskop) is not a self- or co-regulatory scheme, as its use is completely voluntary for AVMS providers, all major Slovenian AVMS providers have agreed to use it through a signed agreement. Providers also actively contribute to the work of the coder committee that promotes tighter collaboration of all the parties and exchanging opinions regarding the classification of programming content.
- In **Sweden**, the implementation of the AVMS directive has resulted in a completely overhauled Radio and Television Act with new rules regarding

[37] https://www.cnc.fr/documents/36995/156431/Rapport_Serge_Tisseron-2.pdf/e841d7ae-ac28-ce7e-f87a-dddd2dd30b14
[38] https://www.internet-beschwerdestelle.de/de/index.html
[39] https://www.jugendschutz.net/verstoss-melden

content warnings and TV-on-demand services, among other things. Furthermore, the Swedish Media Council was given the remit to promote a dialogue between stakeholders within the television industry about the possibility of creating a self-regulation system to homogenise and unify the design of content warnings. This remit was given in 2021 and 2022. The Swedish Press and Broadcasting Authority handle all complaints within the Swedish Radio and Television Act framework.

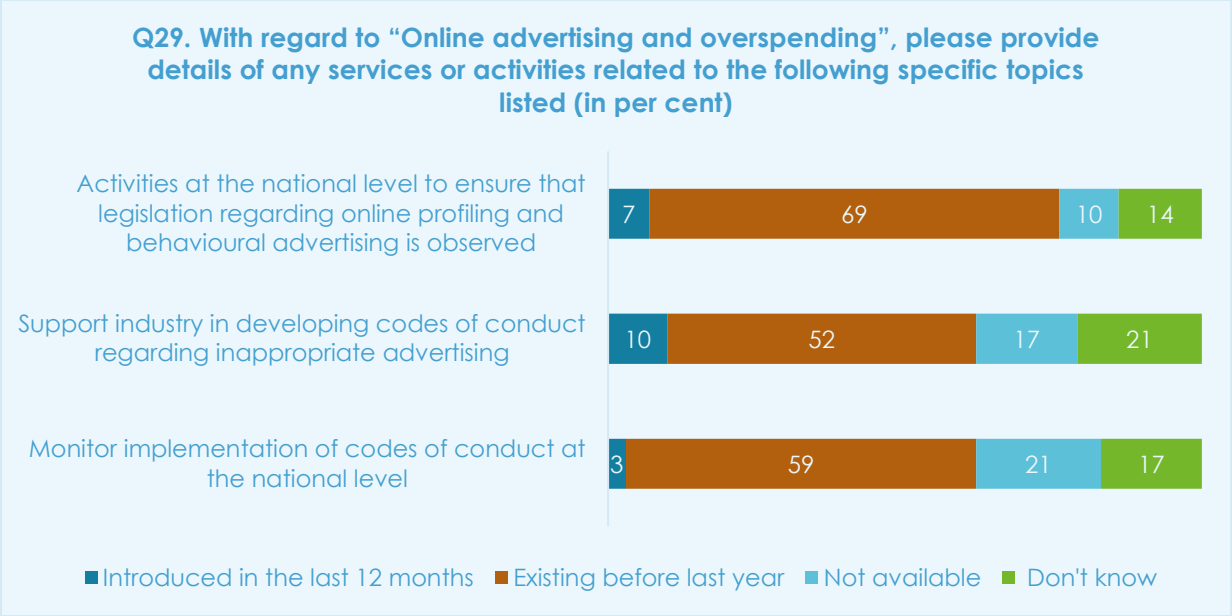
Online advertising and overspending

Protecting children as consumers is an important issue addressed by the BIK+ strategy. The strategy notes that children are more active and independent as consumers than they were 10 years ago when the BIK strategy was first developed. Children may be exposed to or targeted by various online marketing techniques that place them at risk (p.7). Moreover, children who lack consumer literacy may be exploited by social media recommendation systems, targeted advertising, influencer marketing and other commercial practices. To step up its efforts in this area, the Commission intends to map existing research on the impact of neuro-marketing on children by the end of 2022 to support coordinated enforcement activities carried out under the Consumer Protection Cooperation Regulation[40] (p.11) and intends to increase awareness of risks for young consumers (p.13).

The question in the BIK Map tool asks about the national availability of online consumer protection initiatives such as legislation regarding online profiling and behavioural advertising, codes of conduct regarding inappropriate advertising, and whether the implementation of codes of conduct is monitored.

[40] https://commission.europa.eu/law/law-topic/consumer-protection-law/consumer-protection-cooperation-regulation_en

Figure 16: Availability of initiatives with regard to online advertising and overspending



There was a varied response from countries regarding activities dealing with online advertising and overspending.

- 22 countries, or 76 per cent of the total, report that there are activities at the national level to ensure that legislation regarding online profiling and behavioural advertising is observed. Two countries – Croatia and Slovenia – say such activities have been initiated in the last 12 months. Three countries – Bulgaria, the Czech Republic, and Iceland – say that such activities are unavailable nationally.
- A total of 18 countries, or 62 per cent, state that there are supports to encourage the industry to develop codes of conduct regarding inappropriate advertising. In 15 countries, or 52 per cent of the total, these existed before last year. In a further three countries or 10 per cent, these have been more recently introduced.
- However, there is more variation regarding the availability of industry codes of conduct and their implementation. 18 countries, or 62 per cent, also report monitoring of the implementation of codes of conduct at the national level. However, codes of conduct are reported as not available in five countries. The situation is unknown in a further six.

Reported activities regarding online advertising and overspending are similar to those found in the 2020 BIK Policy Map study. Raising awareness of consumer risks was noted to be an area of increased policy focus, with a doubling of the number of countries reporting activities to address young people's consumer literacy. The current report maintains this level of activity and shows a slight increase in national activities from 65 per cent to 75 per cent to ensure that legislation is observed.

Indicative activities, as reported by countries, include:

- In **Estonia**, no significant changes have taken place [since the last report]. The Estonian Consumer Protection and Technical Regulatory Authority is a public agency whose primary responsibility is to raise awareness among industry and the public. The Authority also resolves complaints of consumers.
- A number of activities in this area are included in the **German** report. The Federal Ministry of Environmental issues and Consumer Protection (BMUV) has drafted a youth consumer policy.[41] An overview of consumer education available in schools is published by the Verbraucherzentrale Bundesverband eV.[42]
- In **Norway**, in the fall of 2019, a special committee for influencer marketing (FiM) was set up. The purpose of FiM is to contribute to good and responsible marketing practices for actors involved in influencer marketing. The committee enforces ethical guidelines set down by the industry (based on a draft developed by the regulators). These apply as a supplement to other marketing laws and regulations in Norway.
- In **Poland**, regarding support for industry in developing codes of conduct regarding inappropriate advertising, recommendations of the President of the Office of the Competition and Consumer Protection have been made regarding the marking of advertising content by influencers in social media.[43]
- In **Slovenia**, among the activities at the national level to ensure that legislation regarding online profiling and behavioural advertising is observed, the SI Information Commissioner has published awareness-raising materials on advertising and privacy. The guidelines for customers 'An informed consumer – who is allowed to process my personal data and why?' address the issues of personal data processing when engaging in business or other activities over the internet, mobile marketing, participating in prize-winning games, answering questionnaires on preferences, joining clubs, and applying for loyalty cards.[44]
- In **Spain**, there are various self- and co-regulation systems that exist in this area. These include: the Advertising Code of Conduct (Self-Control, 1996), Toys (2015), Trust Online (2003), Food and Beverages for Children (PAOS, 2005), Spirits (FIAB, 2003), Beer (2003), Video Games (2005), Online Games (2012), Children's Dietetic Products (2012), Cinema (2016).[45]
- In **Sweden**, a guide was introduced in 2019 by the Swedish Consumer Agency for marketing in social media, primarily aimed at influencers' promotion of products and services on social media. Others who work with social media may also benefit from the guidance. It is not specifically about marketing to children and young people, but they are mentioned as a particularly vulnerable target group in this type of marketing.

[41] https://www.bmuv.de/themen/verbraucherschutz-im-bmuv/foerderung-und-forschung/junge-verbraucherpolitik
[42] https://www.verbraucherbildung.de/verbraucherbildung-vor-ort
[43] https://uokik.gov.pl/aktualnosci.php?news_id=18898
[44] https://www.ip-rs.si/fileadmin/user_upload/Pdf/smernice/Informed_consumers_eng_05.02.2012_.pdf
[45] https://www.autocontrol.es/codigos-de-conducta/

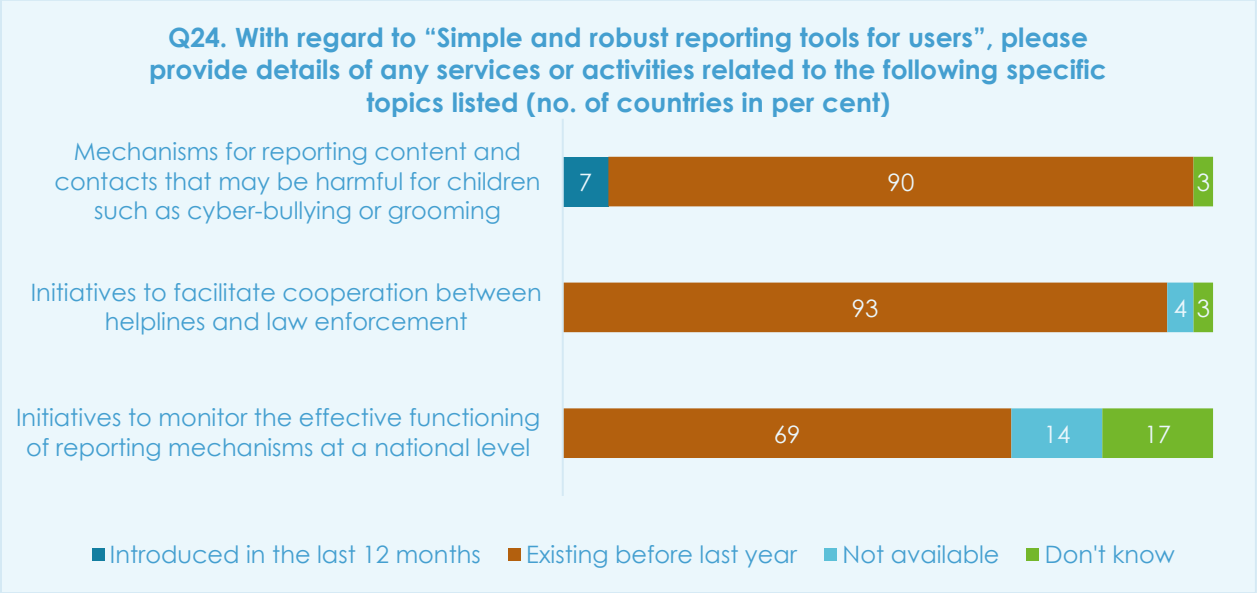
Simple and robust reporting tools for users

In the original BIK strategy, the availability of reporting mechanisms to enable users to report problems that they encountered online was highlighted as an important protection measure. According to the strategy, *"robust mechanisms for reporting content and contacts that seem harmful to children should be available EU-wide across online services and devices"* (European Commission, 2012, p. 9). Industry was encouraged to "*establish and deploy EU-wide, in cooperation with relevant national* actors*, a mechanism allowing children using their services to report harmful content and conduct"* (p.10) with Member States requested to provide the necessary support for setting up and deploying the reporting mechanisms, especially where cooperation with partners such as helplines and law enforcement bodies takes place.

In the BIK+ strategy, the issue of cyberbullying is highlighted as a topic of persistent concern and one of the most reported topics to helplines in the last decade. Under the BIK+ strategy, the Commission undertakes to "*ensure that the 116 111 harmonised number addresses cyberbullying, in cooperation with the EU co-funded SIC helplines, by 2023*" (p.11). The aim of this measure is to ensure that the supports provided by SICs are made more visible and to make all relevant helpline apps and services more accessible to children. More generally, the strategy refers to developing a comprehensive code of practice for age-appropriate design building on the rules of the DSA and in line with AVMSD and GDPR, which also refer to reporting mechanisms.

For the purposes of this report, the item on reporting mechanisms is retained to include further information from Member States regarding national arrangements for child online protection. In this question within the BIK Map tool, countries were asked to indicate if there were activities at the national level related to reporting mechanisms for harmful content or contacts, initiatives to facilitate cooperation between helplines and law enforcement and if any actions existed to monitor the effective functioning of helplines.

Figure 17: Activities to support reporting tools for users



Responses from participating countries show a strong level of support for reporting mechanisms.

- All countries report – with the exception of Romania, for which there is no information – that there are mechanisms in place for reporting issues such as cyberbullying or grooming. Two countries – Spain and Slovakia – have reported new actions in this area in the last 12 months.
- 27 of the 29 countries say there are national-level activities to facilitate cooperation between helplines and law enforcement. This is described as unavailable in Sweden, and the situation is unknown in Croatia.
- 20 countries, or 69 per cent of the total, report the availability of actions at the national level to monitor the effective function of reporting mechanisms. This is unavailable in four countries (Austria, Ireland, Spain and Sweden). There is no information on this item in a further five countries.

Background information provided by countries refers to initiatives to introduce dedicated helplines for cyberbullying and to increase levels of cooperation between stakeholders, including law enforcement, in dealing with reports of harmful content and contact. The following examples illustrate some of the approaches mentioned:

- In **Croatia**, the Safer Internet Centre runs a helpline, a national toll-free advice line for children, parents and adults on internet safety issues and dangers. The same organisation runs the hotline mechanism for reporting inappropriate content.
- The Child Helpline (lasteabi.ee), run by the public agency **Estonian Social Insurance Board**, provides online solutions for children, parents and the public for reporting and assistance and counselling since 2011. Cooperation

between the helpline and Estonian Police and Border Guard follows the mutual agreement.

- In **France**, a strengthening of cooperation with the authorities (Police/Gendarmerie) and industry was noted. *Net Écoute* signed an agreement with the PHAROS service in 2008. The digital brigade of the National Gendarmerie has been a partner of Net Écoute since 2019 and welcomes users when Net Écoute is closed.
- In **Germany**, with the amendment of the Federal Youth Protection Act in 2021, the provision of mechanisms for reporting is made mandatory for user-generated content platforms (§ 24a JuSchG). Platform-independent mechanisms for reporting content and contacts that may be harmful to children, such as cyberbullying or grooming, are provided by *Nummer gegen Kummer,* [46] juuuport.de[47] and jugend.support.[48]
- In **Portugal**, a new Safer Internet Centre website was launched in February 2020. This has multiple free and confidential reporting mechanisms for children and youth to contact the SIC's helpline.[49]
- In **Slovakia**, the National Helpline for Children at Risk has been established. In addition, a new hotline, Ochráň ma, has also been established with the ambition to join INHOPE.

Fighting against child sexual abuse material (CSAM)

Fighting against child sexual abuse (CSA) and child sexual exploitation (CSE) was previously included as Pillar 4 of the 2012 BIK strategy. Following the publication of Commission proposals for a Regulation laying down rules to prevent and combat child sexual abuse in 2022,[50] this is no longer formally part of the updated BIK+ strategy, which instead will be addressed under separate legislation which includes the proposal for the establishment of an EU Centre to prevent and counter child sexual abuse.[51]

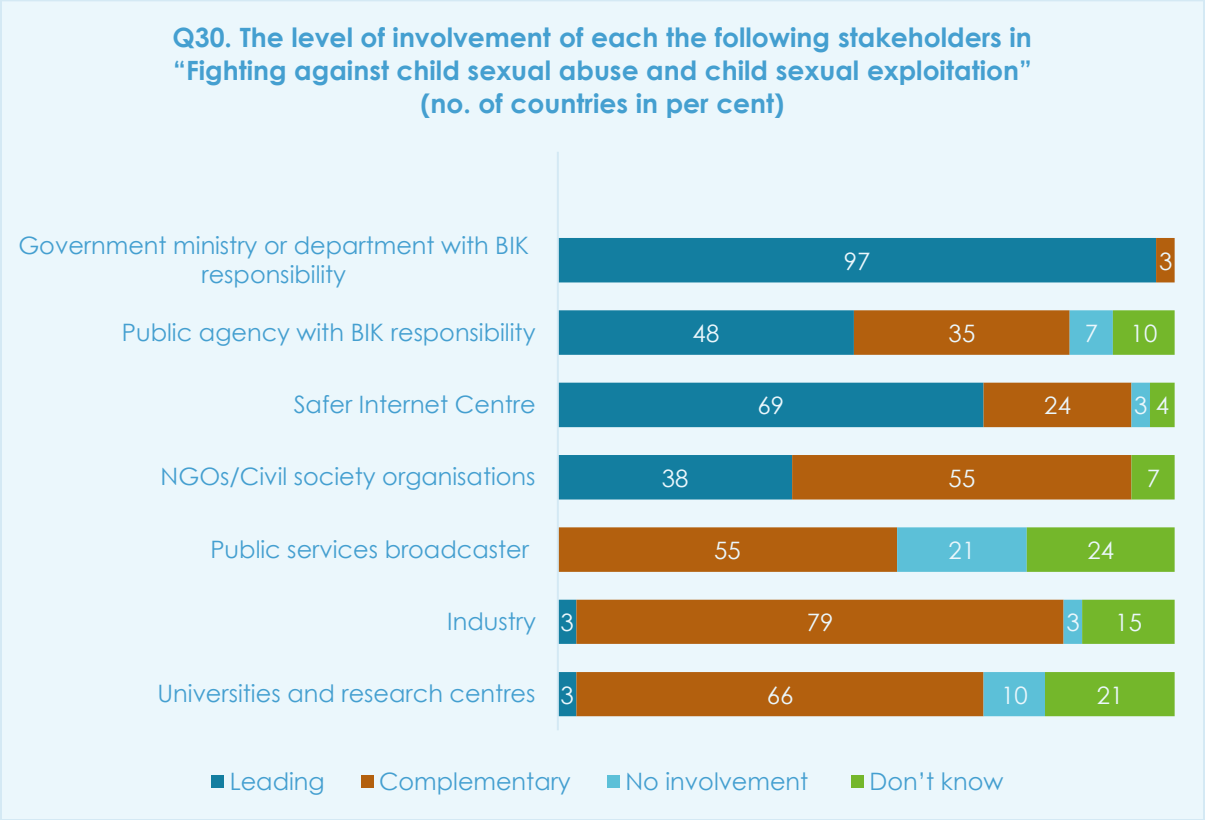
For the purposes of this report, the item relating to combatting child sexual abuse and exploitation is retained for information purposes only. Countries were asked to update information and to highlight any new developments in respect of a) coordination and leadership at the national level in this area, and b) services and

[46] https://www.nummergegenkummer.de
[47] https://www.juuuport.de
[48] https://www.jugend.support
[49] https://www.internetsegura.pt
[50] https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:52022PC0209
[51] See: https://home-affairs.ec.europa.eu/news/eu-proposes-new-rules-fight-child-sexual-abuse-2022-05-11_en

activities at the national level in fighting against online child sexual abuse and exploitation.

Countries were first asked to describe the involvement of different stakeholders in supporting activities on this topic.

***Figure 18**: Stakeholder involvement in fighting against child sexual abuse material*



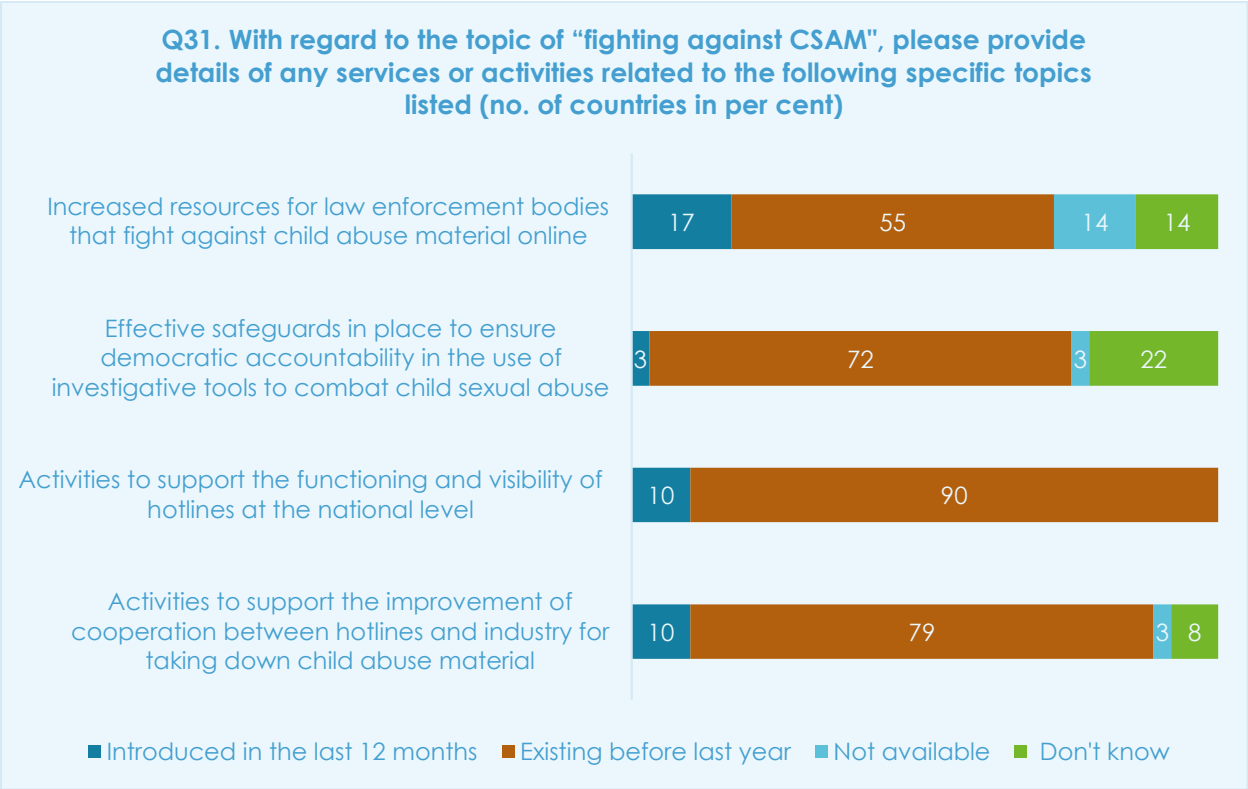
As in previous BIK Policy Map reports, the vast majority of countries report that government ministries or departments with BIK responsibility take the lead in policy and activities to fight against child sexual abuse and child sexual exploitation. However, other stakeholders' involvement in a collective response is also noteworthy.

- 28 of the 29 countries in the study say that government ministries lead on policy regarding combatting child sexual abuse and exploitation.
- Safer Internet Centres, through their hotlines, are also described as having a leading role in 20 out of the 29 countries, or 69 per cent of the total.
- Public agencies with BIK responsibility are also described as leading actors in 14 out of the 29 countries or 48 per cent of the total.
- NGOs are also noteworthy as leading actors in 11 out of the 29 countries, representing 38 per cent of the total.
- Industry is described as having a complementary role in 79 per cent of countries through its response to removal requests and industry-own activities to step up the fight against online child sexual abuse material.

There is little change in the overall profile of the involvement of different stakeholders in fighting against CSAM and child sexual exploitation from previous BIK Policy Map reports, reflecting its status as an established field of practice, albeit with new policy proposals which place mandatory obligations to detect, remove and report child abuse material on their services.

Countries were also asked to report details of the services or activities in this area, indicating if these activities had been newly introduced in the last 12 months, existent before last year or unavailable.

***Figure 19**: Activities to support fighting against CSAM*



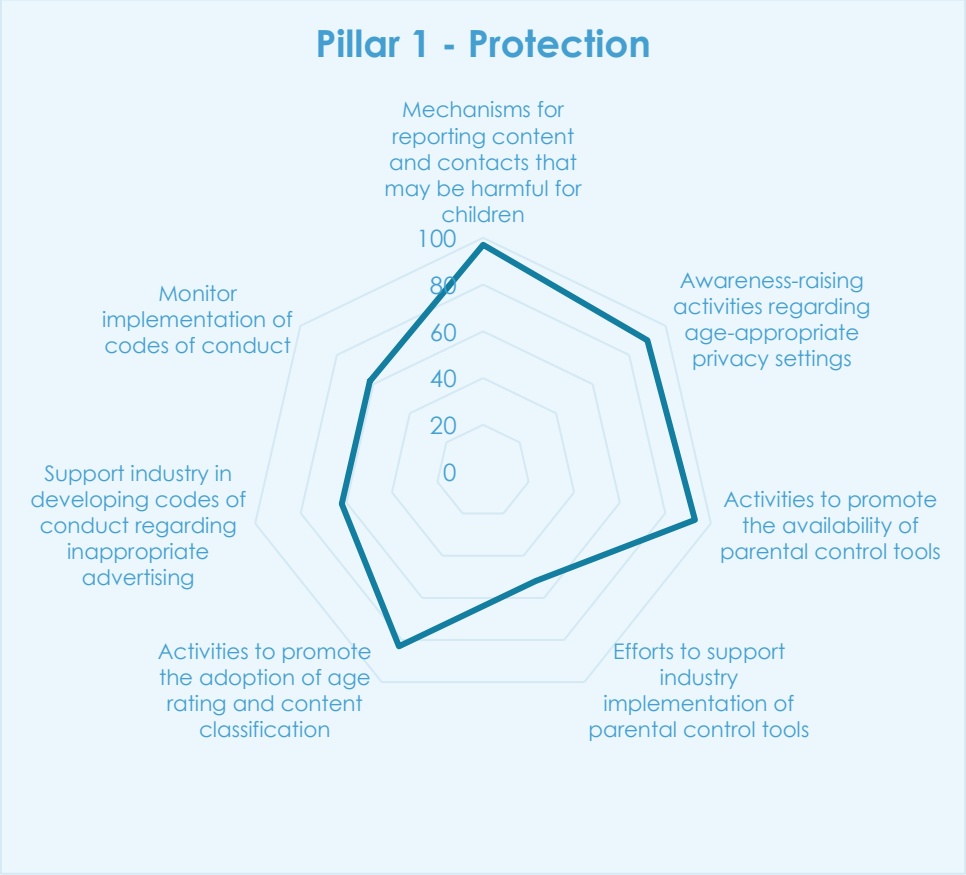
- Overall, 21 countries report that there have been increased resources for law enforcement involved in fighting against child abuse material online. Five countries – Finland, Portugal, Spain, Bulgaria, and Ireland – say this has been newly introduced in the last 12 months.
- Three-quarters or 22 out of the 29 countries in the study say effective safeguards are in place to ensure democratic accountability in using investigative tools to combat sexual abuse. The situation is unknown in six countries and is described as unavailable in one country (Bulgaria).
- Activities to support the functioning and visibility of hotlines at the national level are reported to be present in all countries.
- Activities to support improved cooperation between hotlines and industry for tackling child sexual abuse material exist in 26 out of the 29 countries, or 89 per cent.

All activities under the heading of fighting against online child sexual abuse have increased since the last BIK Policy Map report, reflecting the priority given to this area and underlining its position as the pre-eminent online child protection matter from the national perspective.

Summary

Pillar 1 – safe digital experiences includes a range of actions at the national level that help to protect children online. These include measures related to protecting children from exposure to potentially harmful content, enhancing awareness of privacy, promoting the availability of parental control tools and contributing to consumer literacy and consumer protection. As shown in Figure 20, Pillar 1 is strongly supported in most of these areas. An exception is the topic of consumer literacy, codes of practice and measures to protect children as digital consumers. Issues such as age-appropriate privacy settings, parental controls and content classification remain important national concerns. However, it is also the case that the context for their implementation has changed under new legislation such as GDPR, updated rules for video-sharing platforms (AVMSD) and obligations for enhanced protection of minors with the coming into effect of the Digital Services Act (DSA).

***Figure 20**: BIK policy summary for Pillar 1 – Protection*



Main changes and trends

- **Safer Internet Centres, government ministries and public agencies with BIK responsibility continue to be the lead stakeholders at the national level in supporting a safe environment for children online.** In most countries, there is a shared responsibility for policy and policy delivery in this area. Across all European countries, SICs are the most frequently mentioned leading policy actor.
- **Provision and support for simple and robust reporting tools for problems such as cyberbullying are supported in nearly all countries.** SIC helplines play a particularly important role in this regard.
- **Since GDPR, age-appropriate privacy settings remain a key policy focus**, with policy guidance and awareness-raising on this topic an important activity area.
- **Wider availability and use of parental controls are supported across nearly all countries** and remain among the most frequently cited aspects of online safety messaging and awareness-raising.
- **Age rating and content classification have received more focused policy attention at the national level due to updated national legislation related to AVMSD.**
- **Policy towards online advertising with regard to children as digital consumers is less evenly represented** and has largely stayed the same since the last BIK Policy Map.
- Finally, **most countries report increased resources for law enforcement in fighting against online child abuse material,** confirming this to be a pre-eminent child online protection concern at the national level.

Areas for further exploration

- While many aspects of child online protection policy have stayed the same or shown only marginal increases, **the impact of new legislative and policy changes needs to be tracked regularly**, particularly with the coming into effect of new enforcement regimes that will affect the protection of children when they go online.
- It will be particularly important to **follow changes regarding the status of codes of practice and standards for age-appropriate content**, both those developed nationally and at the EU level with the coming into effect of the Digital Services Act.
- **Age verification is a further important topic in the BIK+ strategy and has received much attention from policymakers**. Policy developments regarding age verification may also have implications for all citizens, requiring the attention of new policy actors. This should also feature in monitoring policies under the BIK Policy Map.
- **Protecting children as digital consumers is likewise a priority in the BIK+ strategy.** Many Member States are updating their consumer protection policies to address the increasingly commercialised aspects of children's

online experiences and the monetisation of online environments. Mapping such developments in line with the objectives of the BIK+ strategy will be important in further development of the BIK Map tool.

Chapter 3: Digital empowerment (Pillar 2)

Pillar 2 of the BIK+ strategy addresses empowering children with the necessary skills to make safe choices and express themselves online (European Commission, 2022, p. 12). Empowering children when they access digital services requires comprehensive support for developing media literacy and digital skills. According to the BIK+ strategy, this will continue to be promoted through support for education, exchange of best practices, and teacher training through the range of supports offered via the betterinternetforkids.eu platform (the 'BIK portal').[52] Pillar 2 also includes support for large-scale media literacy and awareness-raising campaigns. Activities envisaged include age-appropriate and cross-generational exchanges on the creative and responsible use of digital technologies, increasing awareness of risks for children as young consumers and regarding the use of personal data (p.13).

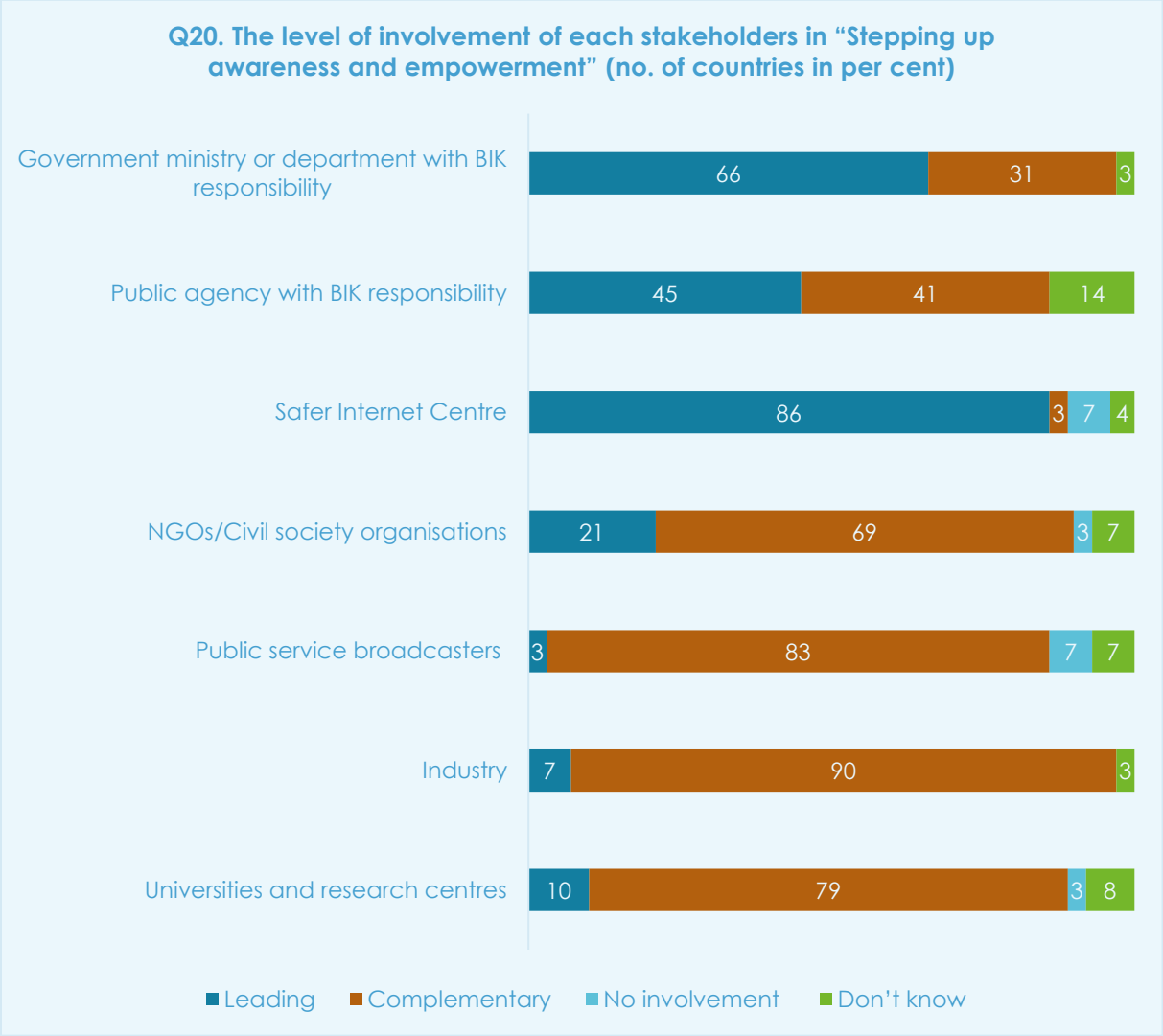
Many of the activities cited in Pillar 2 of the BIK+ strategy were also present in the original BIK strategy theme of *stepping up awareness and empowerment*. The BIK Map tool includes questions on activities to support the teaching of online safety in schools, activities to support digital and media literacy, as well as activities to empower users through support for simple and robust reporting tools for users.

Who leads in delivering this pillar?

Firstly, to provide an overview of the involvement of different stakeholders, countries were asked to indicate which groups were primarily in charge of coordinating policy and activity in the area of awareness and empowerment.

[52] https://www.betterinternetforkids.eu

Figure 21: Stakeholder involvement in stepping up awareness and empowerment (Pillar 2)



As reported by national contacts, Safer Internet Centres, government ministries and public agencies with BIK responsibility are the stakeholders that are most frequently mentioned as having a leading role in awareness and digital empowerment. Notably, many countries point to a collective effort between SICs, government ministries and/or public agencies as joint leading actors on this policy topic.

- 25 of the 29 countries in the study, or 86 per cent overall, say that SICs play a leading role in digital empowerment.
- 19 countries, or 66 per cent of the total, also say that government ministries play a leading role, while 13 countries or 45 per cent, include public agencies with BIK responsibility in this category.
- Other stakeholder groups are described as having a complementary role in awareness-raising and empowerment. Industry is reported by 26 of the 29 countries, or 90 per cent, as having a complementary role along with nearly

all other stakeholder groups who contribute by providing resources, raising awareness and supporting education.

- Just under a quarter of countries, or 21 per cent, identify NGOs and civil society organisations as playing a leading role at the national level in digital empowerment-related activity. A further 20 countries, or 69 per cent, say that NGOs have a complementary role.

Some of the explanations offered by countries provide further detail regarding what is often a shared responsibility at the national level in shaping and delivering digital empowerment.

- In **Bulgaria**, all initiatives, events, and resource development are either done or initiated by the SIC. Other stakeholders join in activities on a voluntary basis.
- **Safer Internet Centre Croatia** is leading in creating quality content for children and young people. The SIC's experts regularly hold workshops in primary and secondary schools and lectures on the topic of children's safety on the internet throughout all of Croatia. The Croatian Safer Internet Centre and Faculty of Law Zagreb, Social Work Study Centre also maintain the lifelong education programme "Benefits and risks of modern technologies".[53]
- In **Denmark**, in recent years, many NGOs, interest groups, public agencies (especially the Media Council as a public agency) and private companies have taken a big responsibility regarding children's online safety and media literacy. They host hotlines; educate children and educators; provide educational material; make hackathons and campaigns, etc.
- In **Estonia**, the Ministry of Education and Research is primarily responsible for developing national action plans and national curricula, including promoting and developing digital literacy. The Education and Youth Board, a governmental agency financed by the Ministry of Education and Research, is responsible for developing and supporting the teaching of ICT and digital literacy. There is a shared responsibility to promote, develop and provide awareness-raising resources and activities. The Estonian SIC plays an active role in the field.
- In **Finland**, ministries develop legislation and provide funding, including to NGOs. Public agencies also provide funding, develop pedagogical practices, coordinate big campaigns, and produce free educational resources. The Safer Internet Centre is coordinated by a public agency. However, all sectors contribute in several ways.
- The Federal Ministry for Family Affairs plays a leading role in **Germany** since it funds several projects in this field. Awareness-raising and provision of orientation for children and youths and adults responsible for education are also tasks of the Federal Agency for the Protection of Children and Youth in the Media since May 2021. In addition, the Children's Commission of the

[53] https://www.pravo.unizg.hr/czo_moderne_tehnologije

German Bundestag published a Recommendation in this regard on 26 June 2019.[54]

- In **Ireland**, the newly established Coimisiún na Meán (Media Commission) will have the specific function of raising awareness to foster public understanding of its work on online safety, among other matters. The Irish Safer Internet Centre is the lead actor currently in the delivery of online safety awareness and empowerment.[55] There is an active civil society sector contributing a wide range of educational, support and awareness activities, many of which are members of the National Advisory Council for Online Safety.[56]
- In **Italy**, public institutions play a central role in policies for a better internet for children both in terms of funding and coordination of activities in the country. Private organisations, such as NGOs and industry, support and implement policies and strategies.
- In **Malta**, in terms of stepping up awareness and empowerment, the Safer Internet Centre takes the initiative to use 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, industry players and young people.

Teaching online safety in schools

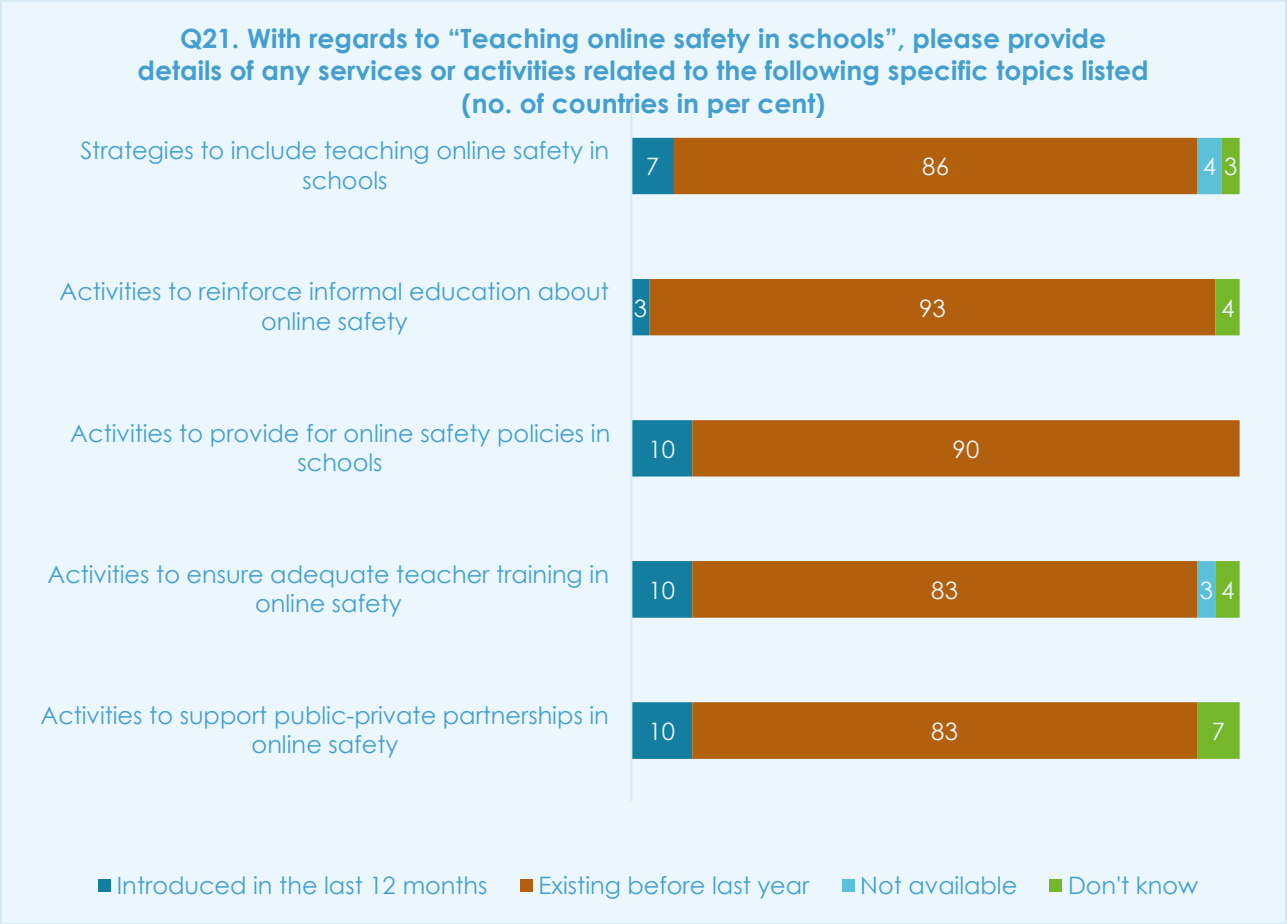
The need to improve online safety education in schools is mentioned in the BIK+ strategy as one of the key messages heard in the Commission's consultation with children (European Commission, 2022, p.8). Along with media literacy, digital skills and competences are recognised as essential for today's children to enable them to learn, connect and be active in the digital environment. As part of the BIK+ strategy, the BIK portal and Safer Internet Centres will continue to support online safety education with resources and material in the Member States. It will also step-up efforts to support teachers by developing teacher modules, including MOOCs, on relevant topics in online safety. SICs will also be promoted as a one-stop-shop for trustworthy resources on media literacy and online safety for children, their families and teachers (p.15).

For this report, countries were asked to update information relating to online safety education activities, particularly teaching online safety in schools. Activities referenced include strategies to include online safety in the curriculum, reinforcing informal education about online safety, supporting the development of online safety

[54] https://www.bundestag.de/resource/blob/651028/0de1b58a7b242fe62c293a19f00cb055/2019-07-10-Stellungnahme-Kindeswohl-und-digitalisierte-Gesellschaft-data.pdf
[55] https://www.webwise.ie/news/the-safer-internet-ireland-awareness-centre-2/
[56] https://www.dccae.gov.ie/en-ie/communications/topics/Internet-Policy/online-safety/national-advisory-council-/Pages/National-Advisory-Council-for-Online-Safety-(NACOS)-Membership.aspx

policies in schools, supporting adequate teacher training in online safety and, finally, supporting public-private partnerships in this area.

***Figure 22**: Activities to support teaching online safety in schools*



Across all topics under the heading of teaching online safety in schools, high levels of support and activity were reported by all countries.

- 27 out of 29 countries report that *strategies to include teaching online safety* in schools were present. The vast majority say that such strategies have been in place since before last year. In two cases – Spain and Latvia – new actions were introduced in the last 12 months. In the case of Bulgaria, this was described as unavailable, while the situation in Romania is unknown.
- Activities to *reinforce informal education about online safety* are also widely supported and present in 28 out of the 29 countries. Slovenia reports new actions introduced in the last 12 months in this area. The situation is unknown in Romania.
- Supporting *online safety policies in schools* is reported to be present in all countries, with Denmark, Estonia, and Latvia reporting new actions in this area.
- Activities to *ensure adequate teacher training in online safety* are also widely supported. Denmark, Estonia and Spain report new activities on this topic.

However, it is described as unavailable in Sweden, and the situation in Romania is unknown.

- Finally, activities to *support public-private partnerships in online safety* are present in all but two countries. New actions are reported in Estonia, Greece and Portugal, while the situation is unknown in Croatia and Romania.

Findings in relation to teaching online safety in schools are very similar to the 2020 BIK Policy Map report and illustrate a continuing high priority for online safety education in EU Member States, Iceland and Norway.

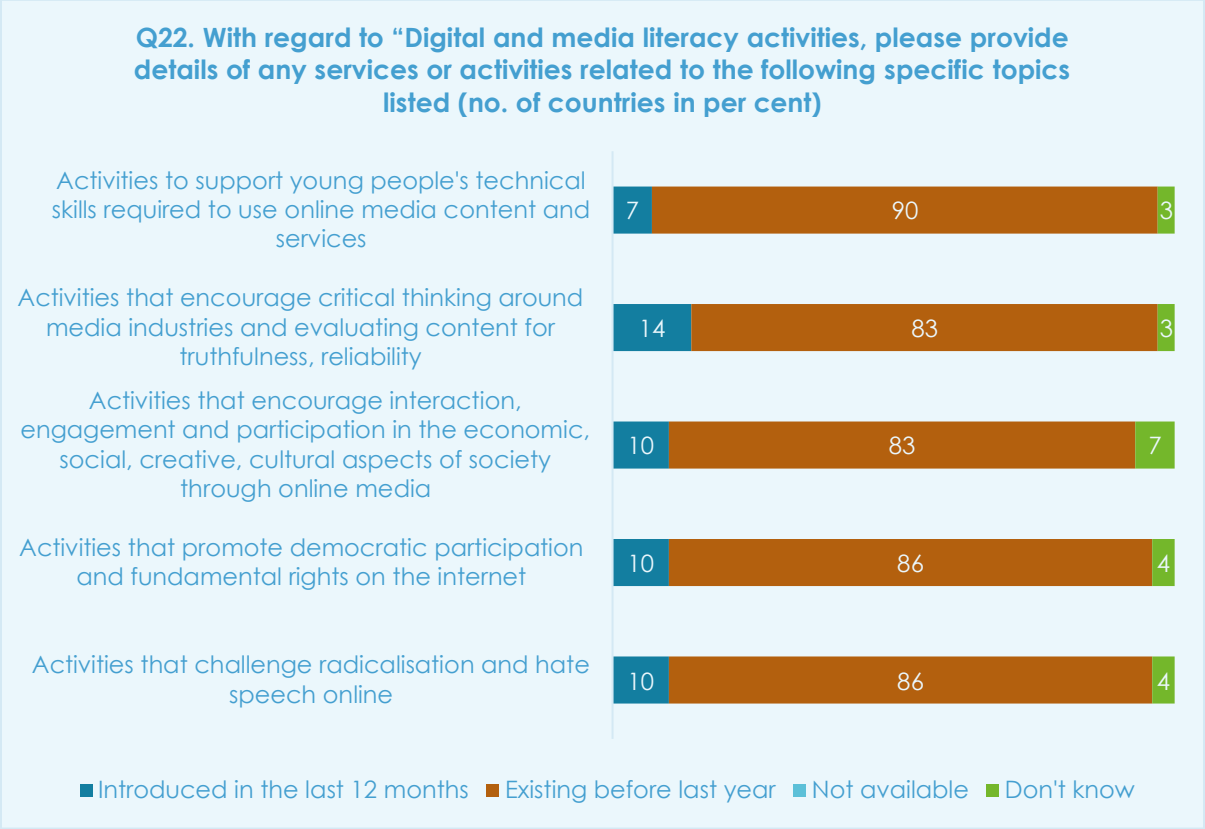
Among noteworthy new initiatives mentioned in country submissions were increased teacher training due to introducing new curricula (Austria, Croatia, Ireland, Luxembourg, Norway), including a new curriculum for early years education (Bulgaria). New initiatives to provide digital technology in schools and to support new pedagogical approaches were also noted (Estonia, Italy, Latvia). Alongside curriculum initiatives and ongoing investments to support the digital transformation of education, the embedding of online safety across the curriculum was also noted, as, for example, in the comment from Sweden that "*Safe and critical online use is not a special school subject, it is an integrated part of most school subjects*".

Digital and media literacy activities

The BIK+ strategy underlines the central role of children's digital and media literacy. Media literacy skills are regarded as crucial for children "*to understand and navigate the information they access online, to identify online risks such as mis/disinformation, scams and fraud, and hidden advertising, and to participate actively and responsibly in the digital economy, society, and in democratic processes*" (p.13). The need for media literacy and critical skills also featured strongly in the European Commission's consultations with children in the drafting of the strategy. Under the BIK+ strategy, the Commission will support large-scale media literacy campaigns (p.13) and promote the exchange of good practices for national curricula on media literacy (p.15).

The BIK Map tool asks countries to update information regarding activities at the national level to support young people's digital and media literacy. The attainment of digital skills, encouraging critical thinking, promoting civic engagement, and combatting hate speech online are all encompassed under this theme.

***Figure 23**: Activities to support digital and media literacy*



Similar to findings on the topic of online safety education in schools, support for digital and media literacy activities is reported to be present in nearly all countries contributing to the study.

- All but one country report that there are activities supporting young people's technical skills in *online media content and services*. Spain and Estonia report new actions in this area in the last 12 months.
- Similarly, all countries except one report activities to *encourage critical thinking around media industries and evaluate content for truthfulness and reliability*. Poland, Spain, Estonia and Slovenia report new activities in this area in the last 12 months.
- All but two countries report broader digital participation activities understood as *activities that encourage interaction, engagement and participation in the economic, social, creative, and cultural aspects of society through online media*. Three countries – Cyprus, Spain and Slovenia – have recently introduced new activities in this area in the last year. The situation is unknown in Croatia and Bulgaria.
- All but one country report that there are activities at the national level *that promote democratic participation and fundamental rights on the internet*. There is no information from Romania on this item.

- Finally, there are *activities that challenge radicalisation and hate speech online* in all countries except for Romania, where the situation is unknown. Estonia, Slovenia and Spain report that new activities in this area have been launched in the last 12 months.

The high levels of support for activities promoting digital and media literacy across most countries suggest this is a well-established area in both national educational policy and in terms of activities carried out by SICs and other national stakeholders. As observed in the Estonian submission:

> *There have not been significant changes [on this topic]. More attention has been paid to hate speech online and for this purpose, relevant resources have been developed. The topics of critical thinking and the reliability of media, including false information, have been more actively addressed and new learning resources for teachers as well as for students have been developed.*

At the same, new strategic resources continue to be developed in responding to an ever-evolving environment, as noted in the Finland report:

> *The Ministry of Education and Culture launched a New Literacies program 2020-2023 to increase the quality and equality in teaching media literacy, programming and ICT skills. Two national agencies (National Audiovisual Institute and National Agency for Education) are coordinating the programme and altogether 11M€ of funding was aimed at local educational organisations to implement the results of the programme.*

In France, while their scope may change, public actors such as Canopé and Clemi maintain a strong level of involvement in this area. New funding was also reported to have been made available to combat radicalisation.

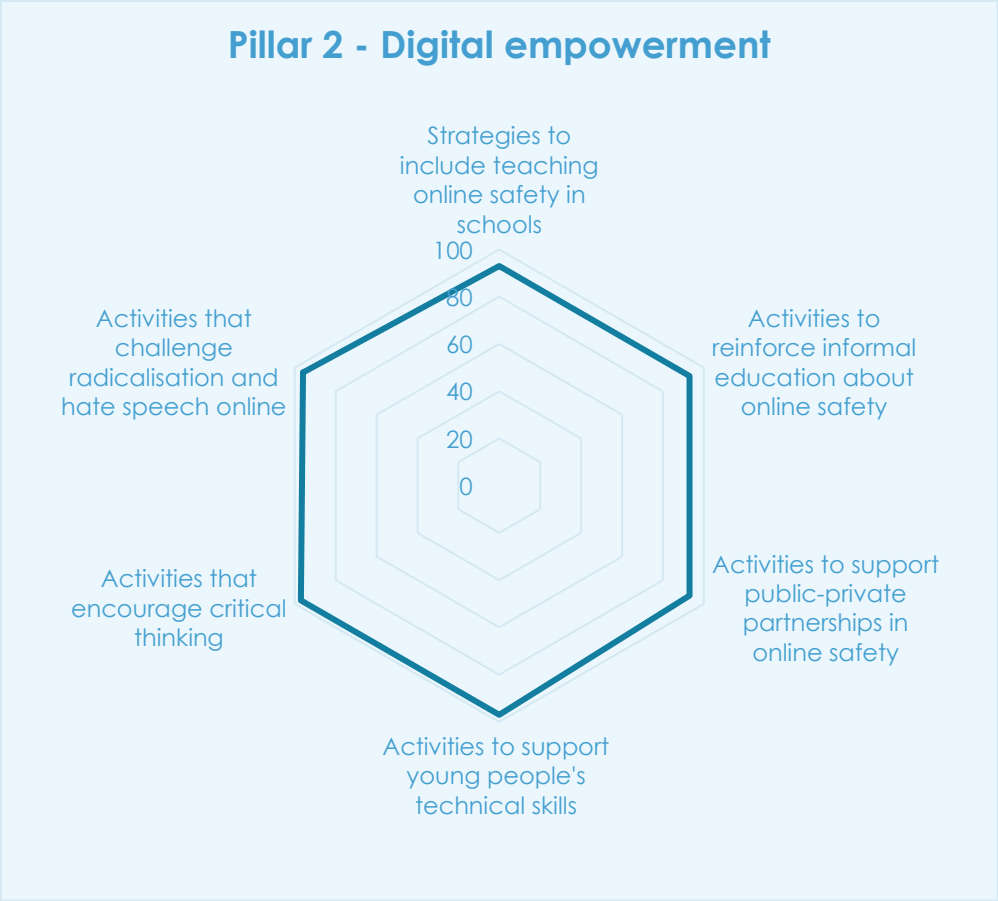
In Poland, NASK and partners from Latvia and Romania (Latvian Internet Association and Save the Children Romania) launched a new two-year project in 2022, *Make it clear – educating young people against disinformation online*, supported under the Creative Europe Programme.

Summary

Digital empowerment, which seeks to support children with digital literacy skills that will enable them to use the internet safely and in a fun way, is a mainstay of national policies and activities to support a better internet for children. All countries report significant activities in this area, which remains a key focus for formal and informal education.

Key issues, as raised in *Chapter 1 – Policy frameworks*, concern the relative scarcity of systematic evaluation and the lack of information regarding the flexibility of curricula to keep pace with the changing digital environment.

***Figure 24**: BIK policy summary for Pillar 2 – Digital empowerment*



Main changes and trends

- **SICs, government ministries and public agencies with BIK responsibility are the lead stakeholders in supporting digital empowerment.** 25 out of 29 countries report that SICs play a leading role in digital empowerment.
- **A high level of commitment is demonstrated across all countries for teaching online safety in schools**, with online safety education a continuing high priority in all EU Member States, Iceland and Norway.
- **Similarly, support for digital and media literacy activities is reported to be present in nearly all countries in the study.** On the report's evidence, this is a well-established area of national educational policy and activities carried out by SICs and other national stakeholders.
- **The range of new curricular innovations and new training programmes show that this area continues to evolve** and respond to a changing digital environment.

Areas for further exploration

- **An important topic for future research is monitoring national policies and measures to tackle forms of a digital divide that affect children's equal, effective, safe and inclusive access to digital technology.** In the BIK+ strategy, the Commission states that it will *pay careful attention to children with special or specific needs or from disadvantaged and vulnerable backgrounds* (p.14). Member States are invited to make the necessary investments to tackle all forms of the digital divide. This aspect should be carefully tracked in future policy mapping.
- Further areas of focus under this pillar in future editions of the BIK Policy Map may encompass **new areas of digital technology, such as AI-based communication and its relevance and impact on children and children's participation in virtual and augmented reality**, with a particular focus on digital empowerment.
- **The systematic mapping of curricula on a national level encompassing both online safety and digital literacy skills is needed to gauge the extent and depth of digital empowerment in education.** A further focus on the evaluation culture of "new" curricula is also needed. It will also be important to monitor actions in relation to equal and inclusive access not just to digital technology but also to digital empowerment.

Chapter 4: Active participation (Pillar 3)

Pillar 3 of the BIK+ strategy is dedicated to improving children's active online participation with more child-led activities to foster innovative and creative digital experiences. Building on its foundation in children's rights, the BIK+ strategy has made children's active participation a distinctive strand of overall policy and planned actions. The BIK+ strategy underlines the importance of supporting children's citizenship skills and the ability to enjoy the right to assembly and association via online social media platforms. Notably, there is a risk that children's voices may be underrepresented in policy and public decision-making, and accordingly, the BIK+ strategy prioritises the active involvement of children in digital policy deliberation.

Under the EU strategy on the Rights of the Child,[57] the Commission has committed to strengthening children's involvement, including establishing a new EU Children's Participation Platform.[58] Once this is established, the BIK+ strategy will – building on existing initiatives such as BIK Youth Ambassadors, BIK Youth Panels and the BIK Youth Pledge for a better Internet[59] – encourage further child-led activities to ensure their voices are heard on key issues of relevance to young people including cybersecurity, ethics and sustainable development (European Commission, 2022, p. 16).

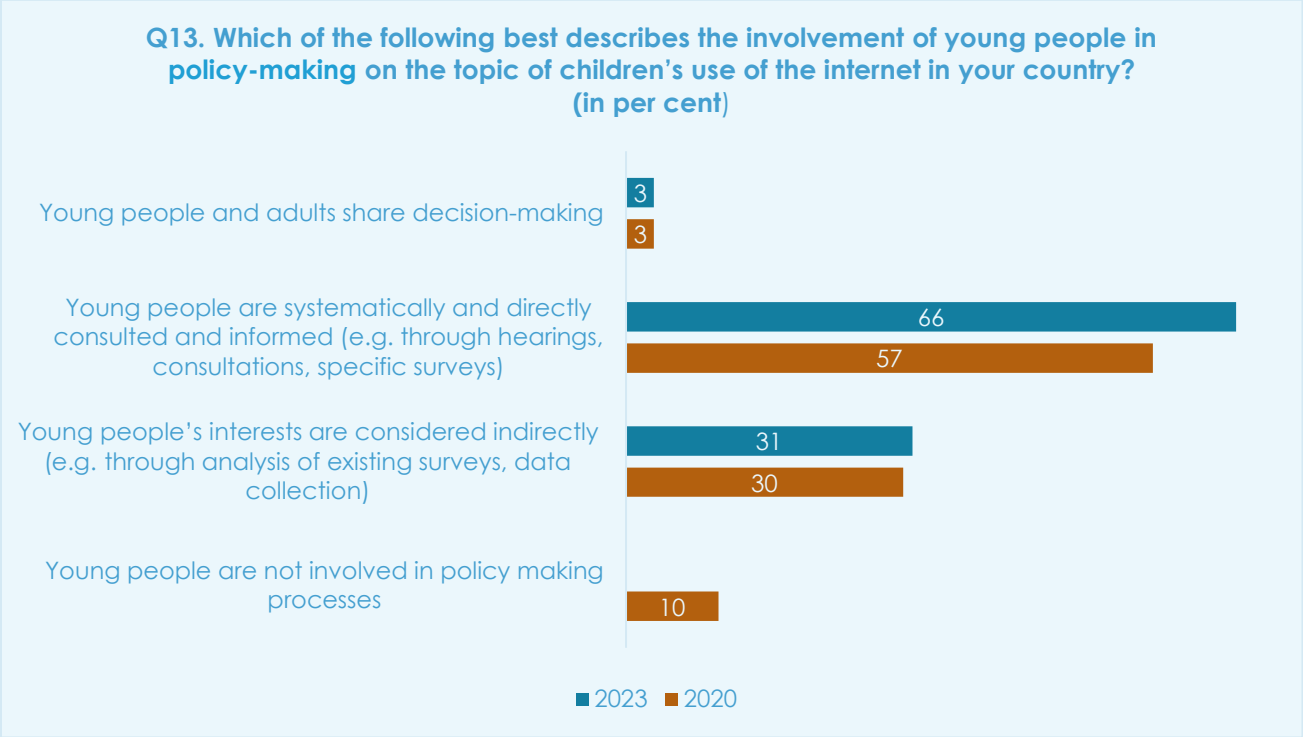
Active participation and the BIK Map tool

Active participation featured in earlier versions of the BIK Map tool whereby countries were asked to describe the level of children's involvement in policy-making in their country.

Using a four-point scale, countries were asked to indicate which of the descriptions best fitted the role of children's involvement ranging from young people not being involved at all through to shared decision making between adults and children. Findings are presented in Figure 25 and include a comparison with findings from the 2020 BIK Policy Map.

[57] https://commission.europa.eu/strategy-and-policy/policies/justice-and-fundamental-rights/rights-child/eu-strategy-rights-child-and-european-child-guarantee_en
[58] https://commission.europa.eu/strategy-and-policy/policies/justice-and-fundamental-rights/rights-child/eu-child-participation-platform_en
[59] https://www.betterinternetforkids.eu/policy/youth-pledge-for-a-better-internet

Figure 25: Children's involvement in policy-making, 2023 and 2020



As illustrated in Figure 25, while all countries confirm that children's views are considered, most countries lie somewhere in the middle regarding how the involvement of children and young people in policy-making is represented.

- In only one country (Iceland), there is a shared decision-making process between children and adults.
- In most countries (19 out of 29 or 69 per cent), young people are systematically and directly consulted and informed on relevant policy processes through hearings, consultations, and specific surveys.
- One-third of countries, or nine of the 29 in the study, state that young people's views and interests are considered more indirectly, for example, through analysis of existing surveys or other forms of data collection.
- There is a slight increase from 17 to 19 countries reporting more systematic consultation with children in policy decision-making compared to 2020. In contrast to 2020, all countries now confirm that children are involved in some way in policy decision-making.

A range of examples of national initiatives is included in country reports to illustrate the increasing priority being given to involving children in policy-making:

- Most countries highlighted the key role of SICs in facilitating consultation with and involvement of children on digital policy issues, with many commenting that child participation is central to all awareness activities.

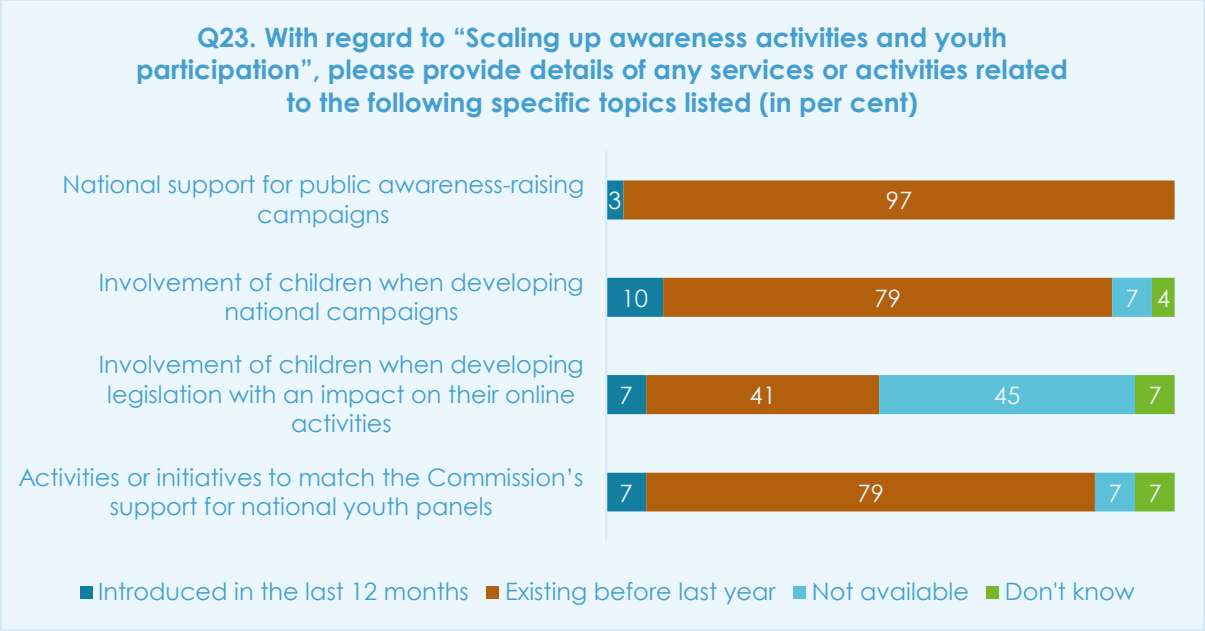
- The role of BIK Youth Ambassadors is particularly noteworthy. The **Czech Republic** noted that as of 2022, the leadership of the youth panel had been placed directly in the hands of the youth ambassadors.
- In **Austria** and **Ireland**, it was noted that there is a national policy for mandatory consultation with children, which is implemented through national youth councils and representative bodies as appropriate.
- A number of countries have established dedicated councils for the purpose of youth participation. These include the Children's Council of the State Agency for Child Protection (**Bulgaria**); the Children's Council at the Ombudsman for Children (**Croatia**); the Public Mentoring Programme launched by National Youth Council, which cooperates with the Deputy Secretary of State for Youth Affairs to promote dialogue between Hungarian youth organisations and the Government and to represent Hungarian youth at European and global level (**Hungary**); the Italian Authority for Children and Adolescents which systematically consults with young people on policy matters (**Italy**); the Council for Children created by the Office of the Commissioner for Children (**Luxembourg**); and the National Council of Swedish Youth Organisations (**Sweden**);
- With the amendment to the Federal Youth Protection Act in **Germany**, an Advisory Board to the Federal Agency for Child and Youth Protection in the Media was established (§ 17b JuSchG). Two out of the twelve-member board are required to be under the age of 17 when being appointed, while one further member is a representative of a youth organisation.

Scaling up awareness activities and youth participation

Awareness-raising has long been a core activity of better internet policies supported under the BIK programme. The updated BIK+ strategy acknowledges this important activity and the central role that Safer Internet Centres play in leading awareness campaigns. In the BIK Map tool, there are a number of questions relating to the involvement of children and young people in these activities.

For example, countries were asked to update information in relation to national support for awareness-raising, the involvement of children, and activities to match the Commission's support for national youth panels.

Figure 26: Activities to support awareness activities and youth participation



As illustrated in Figure 26, all countries report that there is national support for public awareness-raising campaigns. Slovenia notes that new actions were introduced in this area in the last 12 months.

- 26 out of the 29 countries, or 89 per cent, confirm the *involvement of children when developing national awareness-raising campaigns*. Three countries – the Czech Republic, Slovenia and Spain – say there have been new actions in this area introduced in the last 12 months. Two countries – Slovakia and Sweden – say this is not the case. The situation is unknown in Romania.
- Countries are evenly divided in terms of the involvement of children *when developing legislation with an impact on their online activities*. 14 countries, or 48 per cent of the total, say that children are involved in the development of legislation. Estonia and Spain say there have been new initiatives in children's involvement in the last 12 months. 13 countries, or 45 per cent, say that children are not involved in developing national legislation. The situation is unknown in a further two countries (Romania and Belgium).
- Finally, most countries confirm activities to match *the Commission's support for national youth panels*. 25 of the 29 countries, or 86 per cent of the total, report this is the case, with Spain and Greece reporting new actions in this area in the last 12 months. This is described as unavailable in two countries (France and Sweden). The situation is unknown in a further two countries (Croatia and Romania).

Comments from individual country reports highlight the involvement of children in awareness-raising activities and, in some instances, more directly in policy deliberations and decision-making.

- In **Denmark**, youth participation and the perspective of youth are generally core to the activities conducted by the Danish Safer Internet Centre (Media Council for Children and Young People, Save the Children, and Centre for Digital Youth Care). Young people are included in national and internationally organised public events and initiatives. A smaller permanent group of young people regularly participate in the centre's activities. However, the method of including youth in awareness-raising activities will vary.
- In **Germany**, activities or initiatives to match the Commission's support for national youth panels include *klicksafe*, where 100 young people are representatives in the youth panel. They act as youth ambassadors and trend scouts and also support European initiatives such as, for example, the BIK Youth Panel or the Council for Digital Good Europe.
- In **Greece**, the Youth Panel's intervention has been quite crucial on topics related to young people's concerns, illustrated by its involvement in the Me Too campaign,[60] creating an informative video about the view of our body,[61] and in a disinformation campaign.[62] The Youth Panel also plays an active role in meetings of the advisory board, providing valuable insights to the participating organisations and helping to shape policies and initiatives that better serve the needs of young people. Members of the Youth Panel also participate in SID activities as this helps raise awareness about online safety issues among their peers and the wider community.
- In **Lithuania**, in 2022, ChildLine introduced a youth advisory board. Members of the board are between 12 and 18 years old and, in their work, they focus (along with other topics) on how to increase the visibility of ChildLine as the helpline for internet-related issues, what are the most common issues for children online, and what support they need most.
- In **Portugal**, the National Council of Children and Young People is an innovative ongoing initiative of the National Commission, aiming at the creation of a permanent consultation body whose action shall produce an impact on public policies and at the social transformation level, while also voicing the experience, concerns needs and expectations of children and young people and reinforcing the implementation of Article 12 of the United Nations Convention on the Rights of the Child.

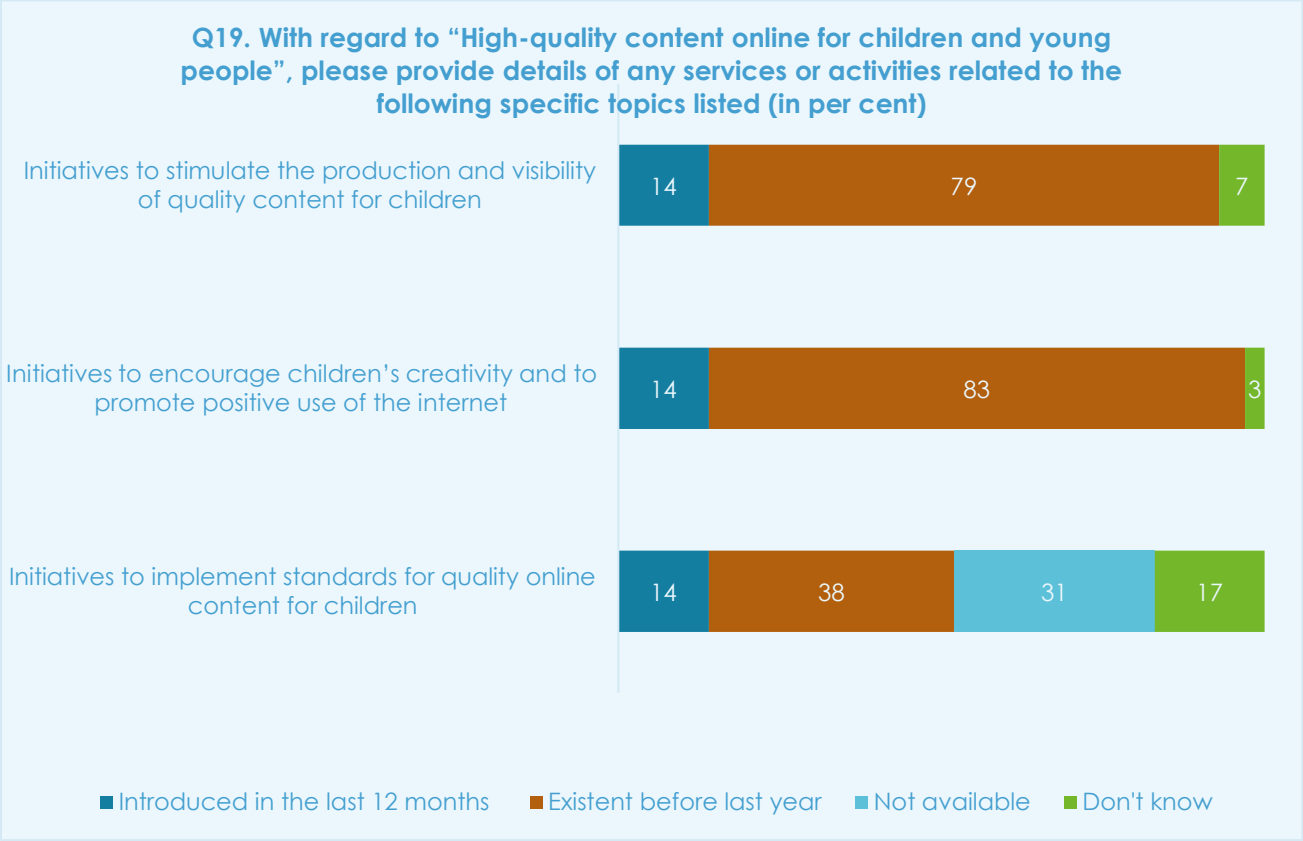
[60] https://saferinternet4kids.gr/youth-area/mila/
[61] https://www.youtube.com/watch?v=MEI2g7pf1tQ
[62] https://www.youtube.com/watch?v=wfIsgT2kxeo

High-quality content online for children and young people

Pillar 3 of the BIK+ strategy also fosters innovative and creative digital experiences, building on a long-standing commitment within the BIK programme to high-quality, positive content for children and opportunities for children to develop their creativity.

The BIK Map tool contains a set of questions related to the topic of high-quality online content for children. Countries are asked to indicate if initiatives exist at the national level to stimulate the production and visibility of quality content for children, if there are initiatives to encourage children's creativity and to promote positive use of the internet, and if there are activities to implement standards for quality online content for children.

***Figure 27**: Activities to support high-quality online content for children*



Previous editions of the BIK Policy Map noted that there had been a somewhat uneven picture across Member States and participating countries regarding this topic. However, since 2020, a notable trend has been an increased focus on supporting children's creativity online.

- 27 of the 29 countries, or 93 per cent in the study, state that there are initiatives at the national level to stimulate the production and visibility of quality

content for children. In four countries – Belgium, Estonia, Slovenia and Spain – there have been new initiatives and activities in this area in the last 12 months.

- Nearly all countries, 28 out of the 29 in the study, report that there are initiatives at the national level to encourage children's creativity and to promote positive use of the internet. Belgium, Estonia, Poland and Slovenia report new initiatives in this area in the last 12 months.
- Implementing standards for quality online content remains a more mixed topic. Just over half of the countries, or 52 per cent, state that there is activity on this topic. One-third say this is unavailable, while the situation is unknown in a further five.

Indicative activities mentioned in individual country reports provide an illustration of measures that support innovative and creative digital experiences for children:

- In **Bulgaria**, youth panel members are actively involved in developing creative online content. In addition, the Bulgarian SIC partners with the teen online media station, TeenStation.
- **Croatia's** SIC, with the support of telecommunications company A1 Croatia, launched the School of Responsible Influencing ("Škola odgovornog influensanja") to make influencers and content creators aware of the importance of responsible behaviour in the online world and raise awareness of the importance of recognising and reporting inappropriate content on the internet, and to recognise the importance of creating positive online content and creating a positive impact.
- In **Estonia**, there has been an increase in initiatives which are aimed at promoting the positive use of the internet and encouraging children's creativity. For example, kindergarten teachers are active in creating online content for children to play and learn. A new platform for children aged 7-12 has been initiated and is financed by Education and Youth Board.
- In **Finland**, in 2020, the Ministry of Education and Culture launched a special grant to implement innovative projects in children's culture. The grant will support innovative projects to strengthen good practices and create new ways for children and young people under 18 to participate in arts and culture.
- In **France**, a lack of support for quality content for children is reported, something that has been progressively replaced by support for innovation rather than content.
- In **Germany**, the Federal Agency for the Protection of Children and Youth in the Media has been charged with the task of providing funds and promoting appropriate content for children and youths by the amended Youth Protection Act in 2021.
- The **Latvian** Safer Internet Centre regularly develops and promotes quality content and also disseminates quality content that organisations and industry members have produced. Every year, the State Inspectorate for Protection of Children's Rights announces a competition where children can express themselves in a creative way about internet safety. The Latvian Safer Internet

Centre organises activities to encourage young people to produce quality content.

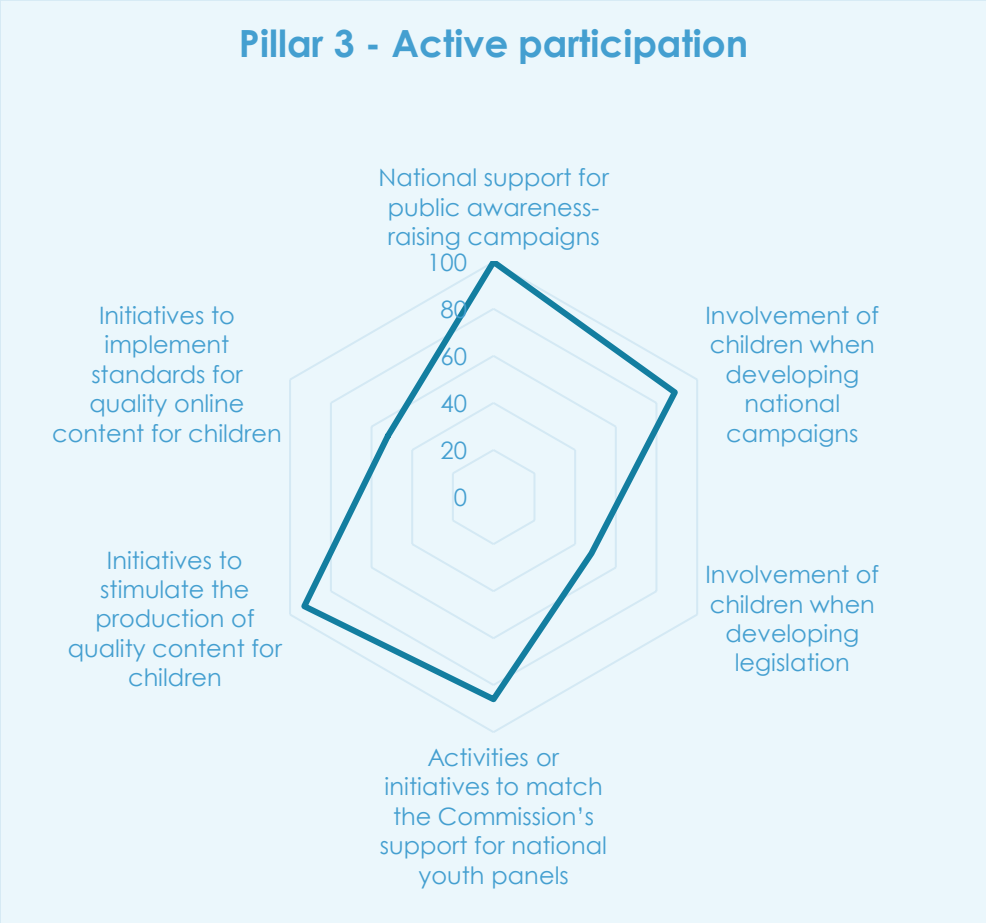
- In **Poland**, a national competition for students, *Stories from the Web*, was conducted as part of the National Educational Network project. The task of the competition was to create graphic works (comic books) about online threats using the stories of heroes from schoolbooks. More than 1,400 entries were submitted to the competition.
- In **Sweden**, the Internet Foundation promotes the positive use of the internet and has increased its participation in digital lessons. Mobile Stories, a start-up company with funding from Google, aims to produce a publishing platform to help young people with source criticism.

Summary

Pillar 3 of the BIK+ strategy supports active participation to demonstrate respect for children's views in shaping the digital environment. According to the BIK+ strategy, children should be supported in developing and practising citizenship skills. Without their active involvement, children risk being "under-represented in policy decision-making processes, leading to unfulfilled needs and unmet expectations" (p. 16).

As shown in Figure 28, the area of active participation is the least developed of the three pillars at the national level. The involvement of children in developing national public awareness-raising campaigns stands out as the most noteworthy achievement. The role of the BIK Youth programme, led by SICs in all countries, is a key contributor to this. Much less developed are mechanisms to involve children more directly in the policy process. Actions to implement and monitor standards for quality online content for children are also scarce.

Figure 28: BIK policy summary for Pillar 3 – Active participation



Main findings and trends

- While high levels of participation of youth, in general, are reported, **this is seldom as decision-makers and instead takes the form of consultations, hearings and specific surveys.**
- Most countries highlight **the key role of SICs in facilitating consultation** with and involvement of children on digital policy issues.
- **Children's involvement in national awareness-raising campaigns stands out,** with the role of BIK Youth Ambassadors being particularly noteworthy.
- In terms of fostering innovative and creative digital experiences, the trend noted in the 2020 BIK Policy Map towards **an increased focus on supporting children's digital creativity has been maintained**. 27 of the 29 countries (93 per cent) in the study say there are initiatives at the national level to stimulate the production and visibility of quality content for children.

Areas for further exploration

- Based on the BIK Policy Map findings, **participation by proxy is the current standard; thus, there is room for improvement regarding BIK+ (and children's rights).**

- With the implementation of actions such as the EU Participation Platform, it will be important **to follow new and innovative forms of participation.**
- **Specific attention should be given to opportunities for children's participation in legislative and policy development regarding the digital environment,** including the extent to which these are made available nationally and how children take them up.

Chapter 5: Conclusions and recommendations

The 2023 BIK Policy Map is the first overview of policies in 27 EU Member States, Iceland and Norway since adopting the updated European strategy for a better internet for kids (BIK+) in May 2022. The study bridges the original BIK strategy, on which the BIK Policy Map project was based, and the revised BIK+ strategy. It comes during a period of major policy change, with significant new laws and regulations coming into effect that are likely to affect children's participation in the digital environment. As such, it marks an important transition point in the Digital Decade to 2030, in which the digital transformation is set to bring about change for all Europeans.

Created to compare and exchange knowledge on policies and activities to support children's use of the internet, the BIK Policy Map presents findings on the policy frameworks and the policy-making processes that exist in all EU Member States, Iceland and Norway, as well as their implementation in activities framed around the three pillars of the BIK+ strategy. This report includes mapping the indicators developed for the original BIK strategy to the revised BIK+ structure, organised around the themes of *safe digital experiences*, *digital empowerment* and *active participation*.

Recommendations regarding policy-making to support a better internet for children are derived from the Collective Impact model, which suggests that collective approaches organised around a common agenda supported by effective governance mechanisms, robust evidence and inclusive stakeholder involvement can lead to the more effective delivery of programmes and activities. Moreover, drawing on its foundation in the EU strategy on the rights of the child, a rights-based emphasis on active involvement and well-being in the digital environment is highlighted.

Policy frameworks

Policy frameworks within the BIK Map tool refer to the organising principles and long-term goals underpinning the diverse range of policies that are developed nationally to support children in their digital practices. The Collective Impact approach expresses this through a common agenda or integrated policy framework connecting the various constituent elements.

This edition of the BIK Policy Map finds that **there is active engagement with the issues nationally with many new policy developments in this area.** There is also increasing awareness of the goals of the BIK+ strategy, and **more countries identify the BIK+ strategy as something which informs their national policy**.

However, in practice, there is high variability in how policy priorities are specified and consequently, **a cohesive approach to BIK policy at the national level is still lacking.** There is, thus, a risk of fragmentation between different areas of policy development and competing policy objectives.

Despite some consolidation, **the siloed nature of policies in this area, noted in the very first BIK Policy Map report, is still evident,** suggesting that drawing together the different strands of BIK-related policy within a common strategic framework remains a challenge. Very few examples of integrating policy frameworks were available in the study. There is also a divergence of approaches between those countries where the topic of children's use of the internet is supported within dedicated policies and those in which children's internet use is contained within broader policies.

Accordingly, **there remains considerable scope at the national level to align BIK-related policies in a more cohesive and strategic fashion with children's rights as a foundation.** It would be beneficial to undertake a more detailed study in further editions of the policy mapping of this aspect of policy provision.

Policy-making

Policy-making refers to the overall process by which policies are developed and includes a consideration of how policies are managed and coordinated at the national level, the role that evidence plays in policy-making, and the involvement of policy stakeholders. The Collective Impact approach reinforces the importance of good communication mechanisms, shared measurement systems and a backbone organisation for effective policy measures, and recommendations are framed on this basis.

The BIK Policy Map study **shows small increases in stakeholder involvement, evidence-based policy-making, and active policy development.** Many of the national policy developments have been triggered by changes in EU law and regulation, for example, with the coming into effect of the GDPR and AVMSD. However, in many countries**, policy development is context-specific and responds to individual country dynamics such as those documented in the country impact case studies.** While there are many good practice examples of collective policy-making, there is also further evidence of **dispersed leadership and fragmentation in the diversity of communication and cooperation mechanisms**, particularly in the context of the increasing complexity of the ecosystem for BIK-related policy.

The main gaps highlighted in this edition of the BIK Policy Map are **the need for dedicated governance structures for policies** and their implementation in the context of a better internet for children, the **continuing need for robust and**

comparative research, and a systematic approach to evaluation to monitor progress in the attainment of BIK policy objectives.

The **lack of reference to child rights impact assessments in national policy development and evaluation approaches is also noteworthy.** Continued focus on these aspects in future BIK Policy Map studies is needed, with more detailed attention to different policy design and governance models, particularly in the context of new and emerging regulatory structures for the digital environment.

Policy pillars

The BIK+ strategy proposes actions around three pillars of *safe digital experiences*, *digital empowerment* and *active participation*. In this edition of the BIK Policy Map, findings regarding activities and initiatives at the national level are organised according to these three pillars using indicators developed for the original BIK Map tool.

Pillar 1 – safe digital experiences was found to be **a rapidly evolving area of policy development in EU Member States, Iceland and Norway.** This is an area in which government ministries lead with the significant involvement of public agencies with BIK responsibility and Safer Internet Centres. What is noteworthy is **the continued relevance of simple reporting tools for users, age-appropriate privacy settings, and content classification** as important areas of policy focus. For example, **age verification and parental controls have assumed greater importance at the national level** in the context of Article 28b AVMSD. **The area of consumer law to protect children as digital consumers was found to be less well-developed**. With the proposed development of the EU code of conduct on age-appropriate design, this area is likely to receive increased attention at the national level.

Pillar 2 – digital empowerment is a well-established area of practice in all countries in the BIK Policy Map. **A high level of commitment to teaching online safety in schools is demonstrated** with online safety education and fostering digital and media literacy as a continuing high priority in all Member States. **The range of new curricular innovations and new training programmes show that this area continues to evolve and respond to a changing digital environment**.

A key area of further development concerns the availability of **national policies and measures to tackle forms of digital divides that affect children's equal, effective, safe and inclusive access to digital technology.** The capacity of online safety education and skills development to respond to new areas of digital technology – including virtual reality and augmented reality, Artificial Intelligence and the use of AI-based communication – will be important areas to monitor in future BIK Policy Map studies.

***Pillar 3 – active participation* is the least developed of the three BIK+ pillars**, according to this edition of the BIK Policy Map. The report finds **evidence of wide consultation but not embedded participation.** Children's involvement in developing national public awareness-raising campaigns, supported by Safer Internet Centres and BIK Youth Ambassadors, is noteworthy in all countries. However, mechanisms to involve children more directly in the policy process are much less developed. Actions to implement and monitor standards for quality online content for children are also scarce. As a newly defined pillar within the BIK+ strategy, it will be important to monitor further development of this policy area at the national level to include opportunities for children's participation in public decision-making, the embedding of children's rights as a cross-cutting action, child-led evaluation activities, and the fostering of innovative and creative digital experiences.

Recommendations for good practices in BIK+ policies

The following recommendations aim to present good policy practices that are likely to support a better internet for children. They are based on the theoretical framework of the BIK Policy Map – the Collective Impact model – and focus on aspects where the study found opportunities for more effective policy governance and delivery. Member States, in many instances, have implemented several of the recommendations, but no one country has followed all the recommendations at this point. Hence, they can be seen as a guideline and a benchmark for making current national policies (even) better. Since the EU is taking more regulatory responsibility in the BIK policy field (e.g., AVMSD, DSA, the proposed CSA Regulation), some recommendations also address the EU level.

Recommendation 1: Establish cross-sectoral, integrated BIK+ policy frameworks with a strong children's rights focus at the country level

In the area of *Policy frameworks,* it is recommended that *integrative frameworks at the Member State level should be created or deepened to draw together the different strands of better internet policies for children. These are cross-cutting by nature and should have a strong foundation in children's rights.*

Recommendation 2: Build strong and sustainable network coordination mechanisms among relevant stakeholders at the country level

With regard to policy processes, it is recommended that *effective cooperation mechanisms should be strengthened at the national level to optimise the involvement of all relevant stakeholders, including government ministries, public agencies, Safer Internet Centres and civil society groups*. This should be established

on a formal basis and in a sustainable way with clear communication channels and taking into account the regulatory points of contact with EU policy makers.

Recommendation 3: Ensure regular and systematic national evaluation mechanisms, including children's participation and impact assessments

Greater emphasis needs to be placed on systematic evaluation mechanisms at the national level to monitor progress in terms of outcomes for children as a result of policy measures aimed at improving safe digital experiences. In accordance with a children's rights-based approach, this should include child rights impact assessments and opportunities for child-led evaluation.

Recommendation 4: Strengthen the EU-wide evidence basis on children online on the EU and country level

Regular, systematic and comparative research on an EU-wide basis is also needed to enhance knowledge of European children's online opportunities, risks and safety in line with the policy goals of the Digital Services Act and the BIK+ strategy.

Recommendation 5: Further monitor initiatives regarding national policy developments in the area of BIK+'s Pillar 1 (Safe digital experiences)

With regard to *Pillar 1 – Safe digital experiences*, *national-level support to match the EU policy measures supporting safe digital experiences should be monitored* in a detailed and consistent way to track the development of national policies. Consideration should be given to a *BIK+ Policy Map Index* conducted regularly to inform and guide policymakers on the most up-to-date BIK-related policy developments. Further indicators and more regular surveys are needed to compare benchmarks included in the BIK Map tool. The BIK Policy Map should also draw on current and new procedures developed for the purpose of monitoring the implementation and transposition of EU laws.

Recommendation 6: Systematically empower children with special needs or vulnerable backgrounds in national policies (Pillar 2 – Digital empowerment)

Regarding *Pillar 2 – Digital empowerment*, *measures to address the digital divide, particularly in respect of access and digital skills for vulnerable populations*, there is currently little evidence from the BIK Policy Map as to progress in this area at the country level. Ensuring that no child is left behind in the digital transformation is a policy priority, including children with special or specific needs, or from disadvantaged and vulnerable backgrounds. Greater visibility to this line of work should be integrated into future BIK Policy Map editions and national reporting.

Recommendation 7: Continuously assess technological developments regarding their risks and opportunities for children

Also, regarding Pillar 2 – Digital empowerment, the *monitoring of educational curricula should be undertaken nationally* to ensure they are sufficiently flexible to address risks and opportunities of emerging digital technologies such as AI-based communication systems, virtual reality and new modes of entertainment and gaming.

Recommendation 8: Strengthen the opportunities to give children an active voice in shaping their digital policies (Pillar 3 - Active participation)

In respect of Pillar 3 – Active participation, *the availability of opportunities for children to participate in legislative and policy development regarding the digital environment should be strengthened on the national level and should be monitored at the EU level, with opportunities to exchange good practices among all Member States*. In addition, fostering innovative and creative digital participatory experiences should be reviewed and updated on the national and EU levels.

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Annex 1: BIK Map Advisory Group

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Annex 2: BIK Policy Map national contacts

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Bulgaria	Bulgarian Safer Internet Centre
Croatia	Office of Ombudsperson for Children
Cyprus	Cyprus Pedagogical Institute – CyberSafety, Cyprus Safer Internet Centre Ministry of Education, Culture, Sport and Youth
Czech Republic	Office of the Government of the Czech Republic
Denmark	Media Council for Children and Young People
Estonia	Estonian Union for Child Welfare, Estonian Safer Internet Centre
Finland	National Audiovisual Institute (KAVI)
France	Safer Internet France
Germany	Stiftung Digitale Chancen Federal Agency for the Protection of Children and Youths in the Media
Greece	SaferInternet4Kids – FORTH, Greek Safer Internet Centre
Hungary	National Media and Infocommunications Authority
Iceland	SAFT.IS, Icelandic Safer Internet Centre
Ireland	Department of Tourism, Culture, Arts, Gaeltacht, Sport and Media
Italy	Safer Internet Centre – Generazioni Connesse (Dr Giovanni Vespoli)
Latvia	State Inspectorate for Protection of Children's Rights
Lithuania	Lithuanian Centre of Non-Formal Youth Education
Luxembourg	Service National de la Jeunesse

Malta	Foundation for Social Welfare Services (FSWS)
Netherlands	Expertisebureau Online Kindermisbruik (EOKM)
Norway	The Norwegian Media Authority
Poland	NASK National Research Institute, Polish Safer Internet Centre
Portugal	Centro Nacional de Cibersegurança (CNCS)
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Slovenia	Ministry of Digital Transformation
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