





# The Better Internet for Kids (BIK) Policy Monitor Report 2024

Better Internet for Kids

### The Better Internet for Kids Policy Monitor Report 2024

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# Contents

Executive summary	10
Key findings	10
Policies	10
BIK+ actions	12
Overall trends and recommendations	14
Chapter 1: The BIK Policy Monitor	17
1.1 About the BIK+ strategy	18
1.1.1 Connections with other European key initiatives	19
1.1.2 Cooperation and multi-stakeholder action	20
1.1.3 A positive vision and empowerment	20
1.2 The conceptual model	21
1.3 Outline of the report	23
Chapter 2: BIK policies in the EU Member States, Iceland and No	rway .25
2.1 Policy frameworks	26
2.1.1 The BIK+ strategy and the nature of policy provision	26
2.1.2 Integrated policy	27
2.1.3 Influence of the BIK+ strategy	30
2.1.4 Children's rights in national legal and policy frameworks	32
2.1.5 Topic summary: policy frameworks	34
2.2 Policy design	37
2.2.1 Evidence and data collection	37
2.2.2 Research support and information systems	40
2.2.3 Research environment	43
2.2.4 Monitoring and evaluation	44
2.2.5 Topic summary: policy design	46
2.3 Policy governance	48
2.3.1 Lead ministry or agency	49
2.3.2 Coordination platforms	51





2.3.3 Availability of a national action plan	54
2.3.4 Topic summary: policy governance	56
2.4 Stakeholder involvement in BIK policy development	58
2.4.1 Stakeholder involvement	58
2.4.2 Public consultation	61
2.4.3 Young people's involvement in policy-making	63
2.4.4 International knowledge exchange	67
2.4.5 Topic summary: stakeholder involvement	68
Chapter 3: BIK+ actions in EU Member States, Iceland and No	rway71
3.1 Pillar 1 - safe digital experiences	71
3.1.1 Responses to EU laws	72
3.1.2 Addressing harmful online content	77
3.1.3 National laws addressing harmful conduct	82
3.1.4 Age verification and digital identity systems for minors	87
3.1.5 Topic summary: Pillar 1 - safe digital experiences	93
3.2 Pillar 2 – digital empowerment	94
3.2.1 Supports in formal education	95
3.2.2 Informal education	101
3.2.3 Empowering through digital skills	107
3.2.4 Topic summary: Pillar 2 - digital empowerment	115
3.3 Pillar 3 - active participation, respecting children	116
3.3.1 Active participation	116
3.3.2 Inclusivity	122
3.3.3 Digital creativity	126
3.3.4 Topic summary: Pillar 3 - active participation, respecting	children 131
Chapter 4: Conclusion	133
4.1 Policy-making within the BIK+ framework	133
4.1.1 Nature of policy provision	133
4.1.2 Need for coordination	135





	4.1.3 Evidence-based policy-making and evaluation needs strengthening
	4.1.4 Stakeholder engagement (especially for children) needs more suppor
4.2	Actions and initiatives implementing the BIK+ strategy
	4.2.1 Pillar 1 - safe digital experiences
	4.2.2 Pillar 2 - digital empowerment
	4.2.3 Pillar 3 - active participation, respecting children
4.3	Recommendations
	4.3.1 Overarching recommendations on policies
	4.3.2 Recommendations on BIK Pillar 1
	4.3.3 Recommendations on BIK Pillar 2
	4.4.4 Recommendations on BIK Pillar 3





# List of figures

Figure 1: BIK Policy Monitor model: four dimensions of the BIK environment	22
Figure 2: Coverage of BIK+ issues in national policies	27
Figure 3: Integration of policy provision	28
Figure 4: Influence of the BIK+ strategy	31
Figure 5: Recognition of children's rights in the digital environment	33
Figure 6: Topic summary – policy frameworks	35
Figure 7: Regular data collection	37
Figure 8: Other information supports	41
Figure 9: National research fund	43
Figure 10: Monitoring and evaluation	45
Figure 11: Topic summary – policy design	47
Figure 12: Lead ministry for policy development	49
Figure 13: National coordination body	52
Figure 14: National action plan or strategy	54
Figure 15: Topic summary – policy governance	57
Figure 16: Stakeholder forum	59
Figure 17: Public consultation	62
Figure 18: Involvement of young people in policy-making	64
Figure 19: International knowledge exchange	67
Figure 20: Topic summary – stakeholder involvement	70
Figure 21: Responses to EU laws (as of the end of February 2024)	72
Figure 22: Actions to address harmful online content	78
Figure 23: Actions to address harmful online conduct	83





## Better Internet for Kids

# The Better Internet for Kids (BIK) Policy Monitor Report 2024

Figure 24: Actions regarding age verification and digital identity	.88
Figure 25: Actions on formal education	.95
Figure 26: Actions on informal education	102
Figure 27: Actions to promote digital skills	107
Figure 28: Actions to promote active participation	117
Figure 29: Actions to promote inclusivity	123
Figure 30: Actions to promote digital creativity	127





# List of tables

Table 1: Topic summary – policy frameworks	.36
Table 2: Topic summary – policy design	.48
Table 3: Topic summary – policy governance	. 57
Table 4: Topic summary – stakeholder involvement	.70
Table 5: Responses to EU laws (as of the end of February 2024)	.73
Table 6: Actions to address harmful online content	.79
Table 7: Actions to address harmful online conduct	.84
Table 8: Actions regarding age verification and digital identity	.89
Table 9: Actions on formal education	.96
Table 10: Actions on informal education	102
Table 11: Actions to promote digital skills	108
Table 12: Actions to promote active participation	117
Table 13: Actions to promote inclusivity	123
Table 14: Actions to promote digital creativity	127





## 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

**CoE** Council of Europe

**DELTA** Working Group on Digital Education: Learning, Teaching, Assessment

**DSA** Digital Services Act

**EC** European Commission

**eID** European Digital Identity framework

**EMPACT** European Multidisciplinary Platform Against Criminal Threats

**ERGA** European Regulators Group for Audiovisual Media Services

**EU** European Union

**GDPR** General Data Protection Regulation

**OECD** Organisation for Economic Co-operation and Development

NGO Non-Governmental Organisation

**SIC** Safer Internet Centre

SID Safer Internet Day

**UN** United Nations

**UNICEF** United Nations International Children's Emergency Fund





# **Executive summary**

The BIK Policy Monitor has been developed to compare and exchange knowledge on policies and activities promoting children's safety and well-being in the digital environment based on the recommended measures in the Better Internet for Kids (BIK)+ strategy. It builds on its predecessor, the BIK Policy Map, and reviews the implementation of the BIK+ strategy in the EU Member States, Iceland and Norway. It presents findings on the level of policies, looking at frameworks, design and evidence-based approaches, governance, and stakeholder involvement, and on the level of implementation of BIK+ actions, focusing on the BIK+ strategy's three pillars: safe digital experiences, digital empowerment and active participation.

The 2024 BIK Policy Monitor Report highlights progress as well as gaps in BIK+ policies, and details actions taken under the BIK+ framework. It updates the state of the art in digital policies to protect and empower children online since the last BIK Policy Map (4<sup>th</sup> edition) was published in May 2023. The report will be further complemented by an interactive BIK Policy Monitor area in the context of the newly developed BIK Knowledge Hub, which will be available with the relaunch of the Better Internet for Kids platform in September 2024.

## **Key findings**

#### **Policies**

#### **Policy frameworks**

Two years on from the adoption of the BIK+ strategy, fostering a better and safer internet for children is an important policy priority in nearly all European countries.

28 of the 29 countries in the survey address the topics of safe digital protection, digital empowerment, and active participation in their national laws, policies, and programmes. Seven countries do so comprehensively (CY, DK, HU, IE, IT, MT, PT). 24 of the 29 countries say that their policies are informed by the BIK+ strategy and, in three cases, explicitly draw on it (BE, CY, MT).







- Three countries describe their policy provision as integrated within one overarching policy framework (MT, NO, SK). 20 countries state that BIK+ is addressed through separate dedicated policies. In six countries, BIK+ topics are covered by broader policies.
- Many noteworthy new policy initiatives were reported. Examples include:
   establishing a new national BIK coordination platform (BE); developing a new
   national strategy for children in the digital environment (HR); creating an
   Expert Commission on the Well-being of Children and Young People (DK);
   developing the Children Online Protection Laboratory (FR); enactment of a
   national Online Safety and Media Regulation Act 2022 (IE).
- 15 out of 29 countries explicitly refer to children's rights in the digital environment in their national policies.

#### Policy design

The availability of research and evidence to support BIK-related policies and topics is, however, fragmented and inconsistent.

- Only 8 out of the 29 countries in the survey report regular data collection on children's digital activity (BE, DE, HU, IS, IT, LU, NO, SE). 14 countries say there is limited or no data collection at the national level. Just one country (BE) states that there is a dedicated national fund for research on children and the digital environment.
- There has been no EU-wide data collection on children's experiences of online risks and safety since funding finished for the EU Kids Online project in 2014.
- Only 8 out of 29 countries report systematic monitoring and evaluation of their policies on this topic (CY, DE, HU, IT, LU, NL, PT, RO). Most countries state that policies are monitored and evaluated but not systematically.

#### **Policy governance**

A number of gaps were also identified in relation to the governance of BIK-related policies.







- Only six out of 29 countries stated that there is a central ministry office, public agency, or regulatory authority formally mandated to lead on and develop BIK-related policies (CY, HR, IE, IT, NO, PT). Over half report that policy development occurs across a range of ministries and that there is no lead ministry or agency with a specific assigned responsibility.
- Just eight of the 29 countries say that there is a clearly defined mechanism to coordinate cross-cutting policy issues and stakeholder involvement on BIKrelated issues (CY, HU, IE, IS, IT, NO, PT, SK).
- One third, or ten out of 29 countries, report that a national action plan on BIK-related topics with defined timelines, assigned responsibilities, and key performance indicators (CY, HU, IE, IS, IT, MT, PT, RO, SI, SK) is in place.

#### Stakeholder involvement

 Only seven out of 29 countries report that they have established dedicated multi-stakeholder forums regarding BIK-related policies (ES, HR, IT, MT, NO, PT, SK). Several ad hoc multi-stakeholder groups exist in a further 12 countries.

#### **BIK+** actions

#### Pillar 1 - safe digital experiences

- Countries are actively engaged in enabling EU laws, such as the Digital Services Act (DSA) and Audiovisual Media Services Directive (AVMSD). Most countries have either enacted or are actively drafting legislation to give effect to these EU laws. Six countries report that they have codes of conduct at the national level to accompany such laws (DE, IE, NL, PT, RO, SE). 16 countries have codes of practice that seek to protect children as young digital consumers.
- Laws against intimate image abuse and cyberbullying are reported to be widely available. 26 countries report that there are relevant laws or policies in place to address intimate image abuse, while 20 countries report laws and







- policies to address cyberbullying. These refer to laws and policies in place before the DSA entered into full effect on 17 February 2024.
- Age verification is a major policy issue in many countries, and new policies are being developed. Four countries (DE, DK, EE, LT) state that a policy on age verification is in place, while eleven countries indicate that this is actively under development.
- 14 out of 29 countries, or just under half of the countries surveyed, have digital identity systems for minors. However, these are generally available only to those over 14 years of age.

#### Pillar 2 - digital empowerment

- Developing digital skills is prominent in nearly all countries and is among the top activities reported within Pillar 2. Activities include supporting young people's digital literacy skills for online communication and collaboration, and media literacy skills.
- 20 out of 29 countries report that online safety and digital literacy are
  integrated into their national school curricula. 21 countries also say that
  adequate support is in place for teacher training on this topic. A similar
  proportion also states that there is national support for informal education
  and lifelong learning on online safety and digital skills. The role of Safer
  Internet Centres (SICs) was found to be especially prominent in promoting
  and supporting informal education opportunities with resources and materials.
- Peer learning was also found to play an important role in awareness raising, digital literacy, and handling sensitive topics. 17 countries report that they have activities to support this. Activities that encourage bystanders to challenge online hate speech and to develop digital civil courage by speaking up against a victim's bullies, perpetrators, or harassers are also reported to be in place or in development in all but one of the countries.





#### Pillar 3 - active participation, respecting children

While over half of surveyed countries report that youth participation in public decision-making is mandated in national legislation, direct involvement in policymaking by children and young people remains limited.

- 19 countries state that activities or programmes are in place to support youth involvement and promote better awareness of children's rights in relation to the digital environment. However, only five countries report that children are actively involved in the design of BIK-related policies (IE, IT, MT, NO, SI).
- 28 out of 29 countries report that they promote digital inclusion and active
  participation by all, addressing barriers of age, gender, and location, and
  reaching underrepresented groups. These include policies and measures to
  ensure representativeness in youth participation structures such as youth
  parliaments and targeted youth work initiatives to reach seldom-heard
  populations. However, evidence of the effectiveness of strategies to promote
  digital inclusion is limited.
- The availability of child-oriented policy communication, such as child-friendly versions of policy documents, is very limited. Only three countries (ES, MT, PT) report that they currently have a system in place for this.
- There is continuing support for positive digital content that encourages safe, enriching experiences and fosters children's digital creativity, many from Safer Internet Centres (SICs) and public service media organisations. 17 out of 29 countries say that they have programmes to promote positive digital content, while 20 countries report activities to promote creative uses of digital technology.

#### **Overall trends and recommendations**

The BIK Policy Monitor highlights the substantial activity taking place within the EU, Iceland and Norway to foster a safer and better online environment for children.

The national policy priorities and initiatives underway align well with the BIK+





strategy and show evidence of significant policy development in tandem with new EU laws, such as the DSA, governing the digital environment.

The 2024 BIK Policy Monitor is the first full review of implementation at the national level since the BIK+ strategy was adopted on 11 May 2022. It provides a baseline for future monitoring reports. Based on the insights from this round of monitoring, recommendations address the need for further development of policy frameworks, governance measures, and continuous evaluation of better internet policy-making at the national level to ensure consolidation and alignment of policy goals.

These include recommendations to enhance policies through:

- Development of integrated policy frameworks at the national level that ensure cohesiveness and alignment with the BIK+ goals of safe digital protection, digital empowerment and active participation, respecting children's rights.
- Support for national coordination platforms, including Safer Internet Centres, and dedicated multi-stakeholder forums to include the wider stakeholder community as well as Digital Services Coordinators.
- Enhanced national data collection systems and comparative European research on children and the digital environment to support evidence-based policies.

Recommendations for developing BIK-related actions include:

- Support for the development of an EU approach to age verification policies and practices that are privacy preserving and respect children's rights.
- Systematic evaluation of laws and regulations in place to protect children from online harms to ensure effectiveness and fitness-for-purpose from the perspective of the child.
- Updating digital literacy initiatives to keep pace with emerging technologies such as generative AI and immersive worlds, and ensuring that teachers and educators are appropriately supported.







- Continued efforts to ensure that all children have equal, effective, safe and inclusive access to digital technology.
- Establish mechanisms and foster best practices that facilitate children's active participation in digital policy development.





# Chapter 1: The BIK Policy Monitor

The European Better Internet for Kids Strategy (the BIK+ strategy) encompasses an ambitious vision for "age-appropriate digital services, with no one left behind and with every child in Europe protected, empowered and respected online" (BIK+ strategy, p.9). The BIK+ strategy is a multi-faceted framework to create a safer, more empowering, and age-appropriate online environment for children across the EU. It aims to protect children from online harms, empower them with digital literacy skills, and create a more age-appropriate online environment. By emphasising children's rights and promoting a collaborative approach, it envisions a digital world where children are not merely protected online but actively equipped to thrive as responsible digital citizens. However, the true impact of this ambitious strategy will depend on its translation into concrete actions at the national level within each of the EU Member States and associated countries; thus, it is crucial to monitor how it takes shape across these diverse contexts.

The BIK Policy Monitor has been developed to review how the BIK+ strategy is implemented. All EU Member States, as well as Iceland and Norway, as active members of Insafe – the network of European Safer Internet Centres (SICs), are included in this review. The BIK Policy Monitor builds on previous editions of the BIK Policy Map and monitors relevant policies, practices, and actions implemented at the national level, which are related or complementary to the BIK+ strategy. Coordinated by the Better Internet for Kids initiative and the EU Expert Group for Safer Internet for Children, the BIK Policy Monitor annually maps changes in the policy environment and tracks developing BIK policy trends.

This first chapter of the report outlines the background and conceptual approach to the BIK Policy Monitor. It is followed by two chapters that summarise findings from the two key dimensions (BIK+ policies and BIK+ actions across the three pillars as outlined in the following section), focusing on the European comparative level. A more detailed presentation of countries' individual BIK-related policies and approaches to implementation is published on the BIK Knowledge Hub, which will be available in September 2024. This also contains a data portal to explore findings





in greater detail through an interactive map, a radar chart tool, and an aggregated BIK Policy Index.

## 1.1 About the BIK+ strategy

The BIK+ strategy aims for 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** to protect children from harmful and illegal content, conduct, contact and 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.
- 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.

The BIK+ strategy is positioned within a highly dynamic policy landscape in which new laws, regulations and policies have been developed to respond to risks and opportunities within a rapidly changing technological environment. Adopted on 11 May 2022, the BIK+ strategy is a successor to the original 2012 European Strategy for a Better Internet for Children and is the latest expression of a long-standing EU commitment to the well-being of children in the digital age.

The BIK+ strategy is a core part of the EU's Digital Decade and contributes to its vision for a human-centric, sustainable digital society empowering citizens and businesses. Its focus on safe digital experiences aligns with the Digital Decade's goal of creating a secure and trustworthy digital environment for all citizens, particularly the most vulnerable. Its promotion of digital skills development and media literacy contributes significantly to the Digital Decade's aim of fostering a digitally competent population. Moreover, the BIK+ strategy's rights-based approach, recognising children as digital citizens, resonates strongly with the Digital





Decade's broader commitment to upholding European values and principles in the digital sphere. By providing a tailored framework and collaborative action plan, the BIK+ strategy advances the overarching Digital Decade goals with respect to children, ensuring their protection, empowerment, and meaningful participation in a rapidly evolving online world.

#### 1.1.1 Connections with other European key initiatives

The BIK+ strategy does not operate in isolation but reinforces and interacts with several other key EU legal and policy frameworks.

The BIK+ strategy, for instance, refers specifically to the **Digital Services Act** (**DSA**). Under the DSA, providers of online platforms that are accessible to minors must put in place appropriate measures to ensure a high level of privacy, safety and security for children using their services. Very large online platforms (VLOPs) must assess their systemic risks, including how their platforms might contribute to spreading harmful content. These assessments must consider potential impacts on children. In addition, the DSA bans targeted advertising to minors based on their personal profiling and known sensitive data (such as religion, ethnicity, or sexual orientation). At the same time, among its commitments, the European Commission (EC) is undertaking to facilitate a comprehensive EU code of conduct on ageappropriate design, building on the new rules in the DSA and in line with the AVMSD and GDPR. Furthermore, the EC has further issued a child-friendly version of the DSA, which is available in 24 national languages, ensuring accessibility to policy for children and young people that directly impacts their (digital) lives.

The BIK+ strategy also amplifies the impact of the **General Data Protection Regulation (GDPR)** and the special protection afforded to children's personal data (Recital 38). The emphasis on age-appropriate design and enhanced transparency reinforces GDPR's core data protection principles when applied specifically to children.

Similarly, the goals of the **Audiovisual Media Services Directive (AVMSD)** concerning the protection of minors and limiting their exposure to harmful online content are elaborated further in the BIK+ strategy. BIK+ initiatives in this context







focus on raising awareness, promoting content classification tools, and providing accessible reporting mechanisms which complement the safeguards outlined in the AVMSD.

Additionally, as AI systems become increasingly interwoven with children's online experiences, the BIK+ strategy interacts with emerging regulatory efforts such as the **Artificial Intelligence (AI) Act**. It advocates for transparency, explainability, and building children's understanding of their interactions with AI-driven platforms. This aligns with the risk-based approach outlined in the AI Act and provides a foundation for future policy development in this area.

#### 1.1.2 Cooperation and multi-stakeholder action

Making the online world safer for children is not just a matter of top-down laws. The BIK+ strategy addresses a wide stakeholder community and encourages cross-border collective actions which contribute to making the online world a safer and better place. National Safer Internet Centres (SICs) in each Member State act as a focal point for delivering many BIK+ activities, ensuring greater consistency in provision across Europe. Research stakeholders also contribute to the BIK agenda by providing a body of knowledge and an evidence base on issues affecting children and young people online, helping to identify emerging trends and shape appropriate responses to the challenges presented. Collaboration with industry involves encouraging technology companies to contribute to a child-centred online environment and ensuring that products and services are safer by design.

#### 1.1.3 A positive vision and empowerment

In addition to seeking to make the online world safer, the BIK+ strategy is also underpinned by a positive vision which aims to help children thrive in the digital world rather than solely focusing on shielding them from harm. Its support for critical thinking and media literacy initiatives aligns with the goal of promoting responsible digital citizenship. The strategy also commits to bridging the digital divide, ensuring all children can access the opportunities and support needed for positive online experiences. Youth participation is also an important priority. The BIK+ strategy supports children's active participation. It respects their views by







incorporating a child-led evaluation of the BIK+ strategy every two years, increasing peer-to-peer activities at national, regional and local levels, and expecting industry actors to consult their young users.

Each of the above aspects of this multifaceted strategy is relevant to and reviewed under the BIK Policy Monitor activity and provides the basis for the survey instrument developed to track progress, gain insights into the national context, and exchange best practices.

## 1.2 The conceptual model

A central aim of the BIK Policy Monitor is to provide data on how BIK-related policies (i.e., relevant national policies intended to protect children when they go online, empower them, and promote their participation and well-being) are being developed and implemented at the national level. The underlying concept of the BIK+ Policy Monitor is that policy development (Policies) and the implementation of actions to give effect to these policies (BIK+ actions) take place in a particular context which is shaped by the availability of technological infrastructure and services (Digital development) as well as by the experiences of children participating in the digital environment (Children's experiences).

These four dimensions frame the approach to the BIK+ Policy Monitor and are illustrated in Figure 1:





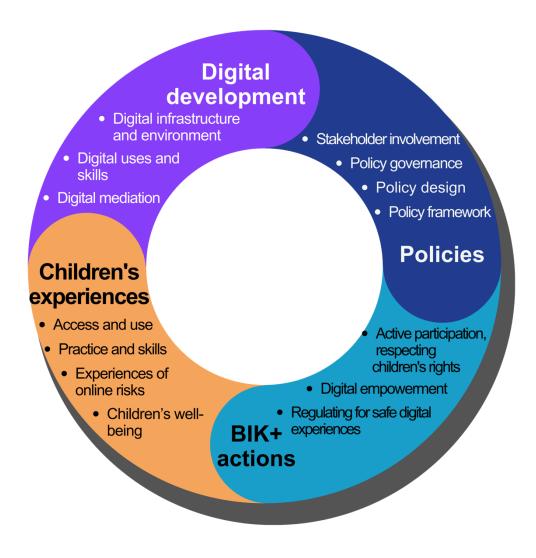


Figure 1: BIK Policy Monitor model: four dimensions of the BIK environment

As in previous editions of the BIK Policy Map, a key focus of the current study is the policy ecosystem for BIK-related activities. Drawing on relevant policy studies literature, the model of collective impact remains an important reference framework for recommendations on how best to achieve the goals of safer and better digital experiences for children. Thus, for example, greater integration across the different strands of better internet policies ('policy frameworks') combined with good governance mechanisms, robust evidence and inclusive stakeholder involvement ('policy-making') within the collective impact model is posited as leading to more effective delivery of programmes and activities ('policy implementation').





The BIK Policy Monitor augments this analysis by including further contextual factors, such as the state of digital development in each country, while also considering data on children's experiences of risks and safety online. These additional factors contribute to the conditions in which policies are shaped and delivered, and give greater insight into BIK+ implementation. The dimensions of Digital development and Children's experiences are included in the individual country profiles to follow, while the current report focuses primarily on the dimensions of Policies and BIK+ actions.

## 1.3 Outline of the report

The BIK Policy Monitor Report presents findings from a survey of all EU Member States, Iceland and Norway between December 2023 and February 2024. The report has been compiled using data from a standardised questionnaire completed by national contacts (referred to as country respondents in this report) in each Member State, with additional desk research conducted by the BIK Team. National contacts were nominated by the members of the Expert Group on Safer Internet for Children.

The questionnaire, which was administered via EUSurvey, contained 40 items with both closed response options as well as open text fields to add contextual detail organised under the following themes:

- **Policies:** 15 questions addressing policy frameworks, policy design, policy governance and stakeholder involvement.
- **BIK+ actions:** 25 questions examining the implementation of the BIK+ strategy's three pillars: Pillar 1 safe digital experiences, Pillar 2 digital empowerment, and Pillar 3 active participation, respecting children.

Following **Chapter 1**, which introduces the BIK Policy Monitor, the remainder of the report is organised as follows:

**Chapter 2** – BIK policies in the EU Member States, Iceland and Norway presents findings on policy-making at the national level. This section outlines how countries







have incorporated children's online use into their policies, how those policies are designed and managed and the extent to which there is a high level of stakeholder involvement.

**Chapter 3** – BIK+ actions in the EU Member States, Iceland and Norway presents findings on actions and initiatives within the BIK+ framework and provides a key measure of how its individual pillars have been implemented.

**Chapter 4** – Conclusion provides an overview of BIK-related policies and actions in EU Member States, Iceland and Norway, identifying some of the high-level patterns and trends compared to previous cycles of the BIK Policy Map. The report concludes with recommendations for further developing BIK+ implementation, drawing on insights from the BIK Policy Monitor.

The charts and tables presenting the data throughout this report, and in particular, under chapters 2 and 3, follow the guidance of the European Statistical Office (Eurostat) and use two-letter country codes to abbreviate (Eurostat glossary: European Union country codes).





# Chapter 2: BIK policies in the EU Member States, Iceland and Norway

Chapter 2 focuses on approaches and progress in relation to the policies dimension across EU Member States, Norway and Iceland. It presents findings on the relevant national policies for implementing the BIK+ strategy, and examines how they are framed, developed, managed, and coordinated. Chapter 2 addresses four main topics as follows:

- Policy frameworks: The BIK Policy Monitor asks if there is a framework at
  the national level addressing children and the digital environment and, if so,
  how it is organised. Policy frameworks are understood as setting out the
  overarching approach, establishing the fundamental goals, principles, and
  guidelines that shape individual policies within a specific area.
- Policy design: The BIK Policy Monitor explores what mechanisms are
  available to inform and support the design of BIK-related policies It asks if
  evidence and research are used to support policies, and if there are systems
  in place for monitoring and evaluating those policies.
- **Policy governance:** Relatedly, the BIK Policy Monitor examines how policies are coordinated at the governmental level, whether other implementation bodies are involved in their delivery, and whether structured mechanisms are available to guide their implementation.
- Stakeholder involvement: The BIK Policy Monitor enquires about how
  different stakeholders can participate in the policy development process.
  Children's involvement in policy-making is one such key issue. Additionally,
  international knowledge exchange about children's digital participation is also
  relevant to this topic.

Based on the BIK Policy Monitor's conceptual framework, it is hypothesised that well-defined policy frameworks, supported by robust governance mechanisms, a







strong evidence base, and effective stakeholder participation, can lead to more effective policy outcomes. Furthermore, such policies can positively impact children's experiences and well-being online.

## 2.1 Policy frameworks

The BIK+ strategy, adopted on 11 May 2022, updates EU policy for the Digital Decade, taking account of new developments in technologies, user trends and legislation. While the BIK+ strategy is relatively recent, this area has been the focus of policy development in EU Member States, Iceland and Norway for many years.

To explore this topic, country respondents were asked where within national policy priorities BIK-related topics are placed, what the nature of such policies was, and to what extent the BIK(+) strategy has influenced policy formation at the national level. In each instance, country respondents were asked to provide relevant examples to support their responses.

#### 2.1.1 The BIK+ strategy and the nature of policy provision

Country respondents were first asked how extensively their current policies address the key themes of the BIK+ strategy, namely, safe digital experiences, digital empowerment, and active participation. Figure 2 below gives an overview of the main findings and shows that the themes of the BIK+ strategy are a policy priority in nearly all countries, and are widely addressed in national laws, policies and regulations.





Q2.1: Are the issues of the BIK+ strategy (children's online protection, empowerment and participation) addressed in public policy(ies) in your country?

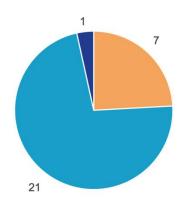




Figure 2: Coverage of BIK+ issues in national policies

- Seven countries report that BIK-related issues are comprehensively addressed in national laws, policies and regulations (CY, DK, HU, IE, IT, MT, PT).
- 21 countries report that it is an important and emerging priority partially covered in national policies (AT, BE, BG, CZ, DE, EE, EL, ES, FI, FR, HR, IS, LT, LU, LV, NL, NO, PL, SE, SI, SK).
- One country (RO) with the survey response of other reports that BIK+ issues are incorporated within general cultural policies, including those for the audiovisual sector.

#### 2.1.2 Integrated policy

Policy provision for BIK-related matters takes various forms, as shown in Figure 3 below.





Q2.2: Which of the following best describes policy provision for the topic of children and the digital environment?

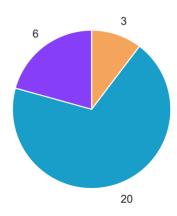




Figure 3: Integration of policy provision

- Three countries (MT, NO, SK) have a single main overarching policy framework for this field on the national level.
- 20 of the 29 countries in the survey have separate, dedicated policies that address the BIK+ pillars of safe digital experiences, digital empowerment and active participation (BE, CY, CZ, DE, DK, EL, ES, FR, HR, HU, IE, IS, IT, LT, LU, LV, NL, PL, RO, SE).
- In six countries, the topic of children and the digital environment is covered by broader policies, such as the national digital strategy, rather than separate dedicated policies. Additionally, not all aspects of protection, empowerment, and participation may be covered (AT, BG, EE, FI, PT, SI).

Examples of integrative policy frameworks include Norway's National Strategy for a Safe Digital Upbringing (2021), the Slovak Republic's National Strategy on the Protection of Children in the Digital Environment, and Malta's Children's Policy Framework 2024-2030. These frameworks touch on most aspects of the BIK+





strategy and integrate diverse policy strands into a single overarching policy statement.

However, as shown by the finding that just three countries have integrated policy frameworks, the norm in the remaining 26 countries is for policy to develop within distinct thematic strands such as online safety and protection, digital education strategy, or wider youth strategies encompassing diverse topics such as civic engagement and active participation.

The following are some examples of the policies referred to in national submissions:

- Policies on safe digital protection include **Germany's** amended Youth
  Protection Act (Jugendschutzgesetz, JuSchG), **Ireland's** Online Safety and
  Media Regulation Act 2022, and various laws enacted in **France** to combat
  school bullying, regulate the exploitation of children's images, and strengthen
  parental controls.
- Illustrative examples of policies on digital transformation in education and digital literacy include Austria's Acht-Punkte-Plan (Eight-Point-Plan/Strategy for a Digital School), Italy's National Plan for Digital Education (PNSD), the Slovenian Digital Education Action Plan 2027, or Spain's National Plan for Digital Skills.
- Youth strategies covering aspects of the digital environment are also widely represented. Examples include the **Austrian** Youth Strategy, the **Greek** policy, "Living in Harmony Together Breaking the Silence": Regulations to prevent and deal with violence and bullying in schools and other provisions or Young **Ireland**: the National Policy Framework for Children and Young People 2023-2028.

Noteworthy among country responses are various new policy initiatives, including a number that are currently in development. For example:

• In 2023, the **Belgian** Federal Parliament voted on a resolution to establish a national coordinating body to address the BIK+ strategy.





- In Croatia, a new National Programme for Children in the Digital
   Environment 2024-2026 following the Digital Croatia Strategy until 2032 –
   is being drafted to address all measures of protection, empowerment and
   participation of children in the digital environment, following the BIK+
   strategy.
- The Danish government has established an Expert Commission on the Wellbeing of Children and Young People to provide recommendations for future policy development. A new Center for Social Media, Tech and Democracy has been established under the Ministry of Culture to advise on policies that can contribute to a robust digital society where technologies are developed and regulated responsibly.

#### 2.1.3 Influence of the BIK+ strategy

Country respondents were asked if national policies explicitly referred to the BIK+ strategy or the original Better Internet for Kids strategy from 2012.





Q2.3: Has the European strategy for a better internet for children (BIK and now BIK+) been explicitly included in any of the national policies on children and the digital environment in your country?

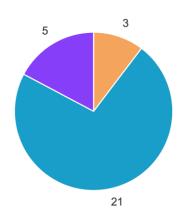




Figure 4: Influence of the BIK+ strategy

As Figure 5 shows, most countries say that the BIK+ strategy has informed policy development rather than by being directly influenced by it in their national policies.

- Three countries (BE, CY, MT) explicitly reference the BIK+ strategy in their national policies.
- 21 of the 29 countries' national policies are reported to be informed by the BIK+ strategy without explicit reference to it (AT, CZ, DE, DK, EE, EL, ES, FR, HR, IE, IS, IT, LU, LV, NL, NO, PL, PT, RO, SI, SK).
- Five countries state that BIK+ has not influenced national policy development. (BG, FR, HU, LT, SE).

Examples of national policies which explicitly refer to the BIK+ strategy include:

Belgium's Resolution to Promote Children's Online Safety (2023) responds
directly to the Better Internet for Kids+ strategy and asks the federal
government to establish a national coordinating body for its implementation
in Belgium.







- The National Strategy for a Better Internet for Children in Cyprus 2018-2023
  adopts ideas from the original BIK strategy and other strategies and actions
  at the national, European and international levels while adapting the
  recommendations to the Cypriot context.
- Malta Digitali 2022-2027, Malta's national digital strategy, also references
  the BIK strategy in measures aiming at a better society where digital services
  are inclusive, user-centred, and where young people are empowered to
  communicate, interact and engage in future work.

#### 2.1.4 Children's rights in national legal and policy frameworks

The BIK+ strategy is distinctive for its foundation in a well-defined framework of children's rights. It is presented as "the digital arm of the rights of the child strategy" (p. 2), reflecting key principles of the EU Strategy on the Rights of the Child and the European Child Guarantee and the European Declaration on Digital Rights and Principles. The BIK+ strategy also refers directly to the United Nation's (UN) General Comment No.25 on children's rights in relation to the digital environment, as well as contributions from the United Nations International Children's Emergency Fund (UNICEF), the Organisation for Economic Co-operation and Development (OECD), and the Council of Europe (CoE) on this topic.

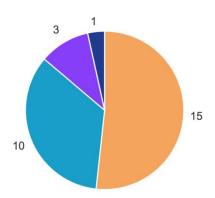
In this context, country respondents were asked if national policies explicitly support children's rights in the digital environment (Figure 5).







Q2.4: Do BIK-related policies explicitly recognise children's rights in relation to the digital environment (i.e., children's digital rights) in relevant national legal and policy frameworks?



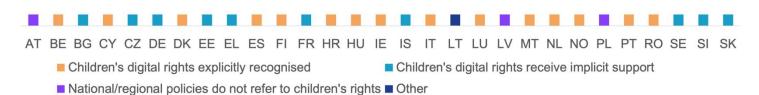


Figure 5: Recognition of children's rights in the digital environment

Children's rights as related to the digital environment receive significant attention in national policies.

- Of the 29 countries surveyed, 15 explicitly recognise children's rights in the digital environment (BE, CY, DK, ES, FI, HR, HU, IE, IT, LU, MT, NL, NO, PT, RO).
- Ten countries say their national policies implicitly support children's rights in relation to digital activities (BG, CZ, DE, EE, EL, FR, IS, SE, SI, SK).
- Three countries state their policies do not refer to children's rights in this context (AT, LV, PL) and one country (LT) with the survey response of other reports that children's rights are recognised in other areas of national children's legislation.

Some examples of policies promoting children's rights as related to the digital environment include:





- Croatia's National Programme for Children in the Digital Environment 2024-2026 (currently in development) and the umbrella National Plan for the Rights of Children in the Republic of Croatia 2022-2026 promote the comprehensive improvement of children's rights, drawing extensively on the BIK+ strategy and incorporating children's direct involvement in policy-making.
- Young Ireland: the National Policy Framework for Children and Young People 2023-2028 is a policy framework that addresses all dimensions of children's lives. It includes the theme of being "connected, respected, and contributing to their world" through the digital environment as one of the five main outcomes of the national strategy.
- Portugal's National Strategy for Children's Rights 2021-2024 includes
  preventing and combating violence against children and young people in the
  digital world as one of its five priority areas.
- In 2020, **Sweden** incorporated the United Nations Convention on the Rights of the Child into national law, creating a basis for a child rights-based approach in all public activities.

#### 2.1.5 Topic summary: policy frameworks

Summarising findings on the topic of policy frameworks, it may be observed that:

- Better internet policies are a priority in nearly all countries, with all EU
  Member States, Iceland and Norway, giving substantial attention to
  protecting, empowering and facilitating children's active participation in the
  digital environment through their national laws, regulations and policies. The
  BIK+ strategy also informs policy development in most countries.
- Significant new policy developments at the national level are evident in most countries, with examples of new integrative frameworks focusing on BIKrelated topics. Policies are being developed in several areas that are in line with the multifaceted nature of the issues and within the thematic strands of the three BIK+ pillars.







 Many new policy developments refer to children's rights in the digital environment and address topics such as children's health and well-being.

Figure 6 draws on the countries' responses to the survey to summarise high, medium, and lower levels of implementation of policy frameworks.

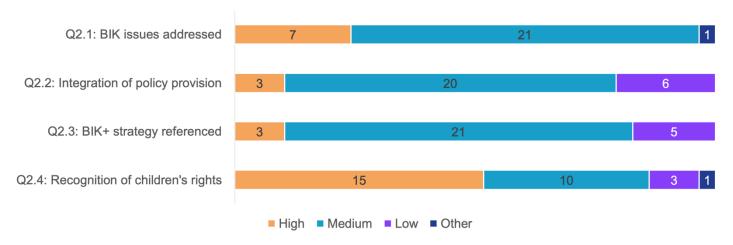


Figure 6: Topic summary – policy frameworks





	High	Medium	Low	Other
Q2.1 BIK issues addressed	CY, DK, HU, IE, IT, MT, PT	AT, BE, BG, CZ, DE, EE, EL, ES, FI, FR, HR, IS, LT, LU, LV, NL, NO, PL, SE, SI, SK	_	RO
Q2.2: Integration of policy provision	MT, NO, SK	BE, CY, CZ, DE, DK, EL, ES, FR, HR, HU, IE, IS, IT, LT, LU, LV, NL, PL, RO, SE	AT, BG, EE, FI, PT, SI	_
Q2.3: BIK+ strategy referenced	BE, CY, MT	AT, CZ, DE, DK, EE, EL, ES, FI, HR, IE, IS, IT, LU, LV, NL, NO, PL, PT, RO, SI, SK		_
Q2.4: Recognition of children's rights	BE, CY, DK, ES, FI, HR, HU, IE, IT, LU, MT, NL, NO, PT, RO	EE, EL, FR, IS,	AT, LT, LV, PL	LT

Table 1: Topic summary – policy frameworks





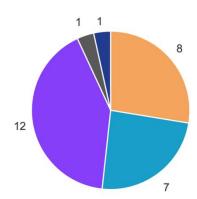
## 2.2 Policy design

The topic of policy design focuses on the processes of policy development, in particular, the availability of national evidence-based methods and mechanisms to inform policy-making in areas relevant to the BIK+ strategy. This section addresses the availability of regular data collection on children's internet use, other information supports used to inform policies, and whether a system is in place for commissioning new studies on children's digital experiences and activities. The extent of monitoring and evaluation is also addressed.

#### 2.2.1 Evidence and data collection

Country respondents were first asked if a system was in place to collect statistical data systematically and regularly about children's digital activities. A summary of the findings is given in Figure 7 below.

Q2.5: Are national statistical systems or other competent authorities systematically and regularly collecting data on children's digital activities in dedicated surveys?





- Regular nationally representative surveys
- Quantitative data on some aspects in broader surveys

Irregular surveys

■ No data collection

Other

Figure 7: Regular data collection







Data collection in European countries regarding children's activities in the digital environment remains very uneven and fragmented:

- Eight countries report a regular (annual or bi-annual) nationally representative survey focusing on children's digital activity, which informs policies on this topic (BE, DE, HU, IS, IT, LU, NO, SE).
- Seven further countries state that quantitative data is collected within the context of broader surveys (AT, CZ, DK, EE, FI, PL, PT).
- The remaining countries report limited or no data collection. Twelve countries say that surveys of children's digital activities are undertaken irregularly, through participation in initiatives such as periodic EU Kids Online surveys (BG, CY, EL, ES, FR, HR, IE, LT, LV, MT, SI, SK).
- One country respondent (NL) states that no regular data collection at the
  national level is currently conducted on children's digital activity, and another
  country respondent (RO) reported that there was no information available on
  the topic (survey response other).

The availability of evidence to support policy-making was a key topic in earlier editions of the BIK Policy Map. The 2020 BIK Policy Map noted an increase in data availability, principally due to the EU Kids Online survey of 19 countries conducted during the period 2018-2019. This trend has not been maintained, however, with just a quarter of countries saying that regular surveys are carried out. The data from studies that are carried out periodically or irregularly on the national level, while fragmented across the EU Member States, Iceland and Norway, also do not facilitate cross-country comparisons as methodological approaches and areas of focus vary widely.

Examples of data collection on children's digital activity that is carried out regularly include:

• **Belgium:** A biannual study called "apenstaartjaren" is conducted in Flanders, while in Wallonia, an equivalent Generation 2024 study is carried out.





- **Germany:** Since 1998, the JIM Study has been conducted annually as a basic study on the media consumption of 12- to 19-year-olds. The KIM Study has also tracked the significance of media in the everyday lives of children aged 6 to 13. In addition, the Youth Media Protection Index (Jugendmedienschutzindex) examines how the protection of children and young people from negative online experiences is reflected in the concerns, attitudes, skills and actions of parents, and children and young people themselves.
- **Hungary:** A national study on Digital Parenting has been carried out every two to three years, examining the media use of Hungarian children aged 7 to 16 and their parents' digital parenting strategies. The research is conducted on a representative sample of 2,000 children and 2,000 parents in personal interviews based on a structured questionnaire.
- **Italy:** The Italian National Institute of Statistics regularly surveys and collects data on cyberbullying and hate speech. Moreover, several public and private institutions carry out qualitative and quantitative research and studies focused on children's digital activity, which informs national policies on this topic every year.
- Luxembourg: Since 2022, the national Safer Internet Centre, BEE SECURE, has published an annual report on the use of ICT by children and young people in Luxembourg.
- **Norway:** Every second year, the Norwegian Media Authority collects data on children and young people's everyday media lives.
- **Sweden:** The Swedish Agency for the Media is tasked by the government to follow and analyse the development of children's and young people's media usage.

Research on selected areas of children's digital use is also included in broader studies:







- The annual Eurostat surveys of ICT usage of households and individuals in EU Member States are frequently mentioned in national responses. Some countries, such as **Spain's** CIS or **Portugal's** National Statistics Institute (INE), include items relating to children's digital activity. In **Poland**, parents of children under 16 are asked every second year about their children's use of electronic devices (computer, tablet, smartphone).
- **Ireland's** longitudinal study of children, Growing Up In Ireland, includes some aspects of children's digital use. However, this study is periodic rather than regular, with data collected in waves, sometimes five years apart, for different age cohorts.
- Safer Internet Centres (SICs) were also noted to be an important source of national data on children's digital use. Examples included the **Austrian** SIC's Jugend-Internet-Monitor, the **Bulgarian** SIC's periodic studies of children's digital use, and the **Greek** SIC's study of 26,000 students aged between 10 and 17 nationally.
- Further sources of national data on children's digital experiences are the
  periodic European School Survey Project on Alcohol and Other Drugs (ESPAD)
  and the international Health Behaviour in School-aged Children (HBSC)
  survey. Both surveys address some aspects of children's internet use and
  activities. The Czech Republic and Estonia referred to these as important
  sources of data.

#### 2.2.2 Research support and information systems

Country respondents were also asked to indicate if *other* systems were in place at the government level to inform policy development. These might include dedicated research units within government settings, think tanks, or commissions on topics relevant to children and the digital environment (Figure 8).





Q2.6: Are there other systems in place at the government level to inform policy development?

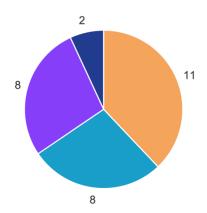




Figure 8: Other information supports

- Eleven countries report that government systems are in place to gather information on children and the digital environment (BE, CY, DK, ES, HU, IE, IS, IT, NO, SE, SI).
- Eight countries say that information is regularly gathered to inform policies on children and the digital environment (AT, CZ, EE, EL, FR, MT, NL, PT). However, this relies primarily on third-party sources, and there are limited opportunities to commission new data on children's digital activity.
- Eight more countries report that no system is in place at the government level to gather information on children and the digital environment (BG, HR, LT, LU, LV, PL, RO, SK).
- Two further country respondents (DE, FI) state that there are other relevant agencies at the national level which contribute information on this topic (survey response other).





Creating dedicated government commissions or expert groups on specialised topics is a noteworthy feature in several countries' responses. Issues such as children's health and well-being in the digital environment stand out. Examples include:

- In Croatia, a new National Programme for Children in the Digital Environment for 2024-2026 is being drafted to examine the protection, empowerment and participation of children in the digital environment, aligned with BIK+.
- In **Denmark**, an Expert Commission on Well-being of Children and Young
  People has been established to examine how the digital lives of children and
  young people on digital platforms and social media can impact their wellbeing.
- In **France**, in January 2024, the President of the Republic called for the creation of a special commission comprising experts in protecting minors online. This follows the establishment of the Children Online Protection Lab as a special initiative of the French President in 2022. France's Awareness Centre, Internet Sans Crainte, is a member of the commission.
- In **Italy**, the National Observatory on Childhood and Adolescence conducted a fact-finding survey on the impact of the internet and new technologies on the psychophysical health of minors.
- In Norway, the Ministry of Children and Families is reviewing whether its
  national consumer protection legislation and enforcement are up to date and
  adequately protect children and young consumers in digital media.
- In Spain, the government has proposed creating an Expert Committee under the Ministry of Children and Youth to develop recommendations for a comprehensive online protection plan for children and young people.
   Additionally, the Spanish Data Protection Agency (AEPD) has created a Privacy and Digital Health Working Group to address children's health and well-being.



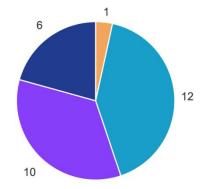


Other examples cited in countries' submissions include specialist governmental units focused on digital learning. Hungary's Digital Pedagogical Methodology Centre (DPMK), the Danish Evaluation Institute (EVA), and Finland's National Agency for Education (EDUFI) are some of the many examples cited that promote research on digital transformation in education.

#### 2.2.3 Research environment

The BIK Policy Monitor also reviewed the prevailing research environment at the country level and enquired if there is a central research fund or government-supported research programme dedicated to children and the digital environment (Figure 9).

Q2.7: Is there a central research fund or research programme supported by government dedicated to children and the digital environment?



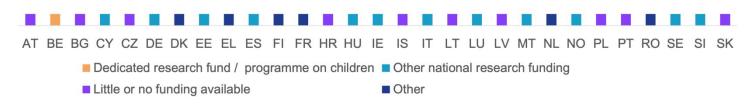


Figure 9: National research fund

Funding for research on children and the digital environment is scarce, with only one country reporting a dedicated fund. Most countries rely on limited, non-specific sources:







- Just one country (BE) reports the existence of a dedicated national fund for research on children and the digital environment.
- Existing national research funding may be used for research on children and the digital environment in 12 of the 29 countries (CY, DE, EE, ES, HU, IE, IT, LU, MT, NO, SE, SI). However, this is not explicitly specified, and there are no dedicated programmes.
- For 12 of the 29 countries, research occurs within a broader landscape of funded research opportunities supported by other agencies focused on children's well-being, such as national research institutes that study children's lives, national Ombudsman offices, and other government departments or agencies focused on children. However, ten countries state that little or no funding is available for research on this topic (AT, BG, CZ, HR, IS, LT, LV, PL, PT, SK).
- Six further country respondents (DK, EL, FI, FR, NL, RO) reported on diverse other potential funding sources, including some new initiatives under consideration, regional sources, or international collaborations.

Collaborations between government agencies, educational institutions, and non-governmental organisations were recognised as important to fostering research opportunities dedicated to studying children's interactions with digital technologies and online environments. For example, funding available in Germany through the Federal Child and Youth Services Plan facilitates regular scientific exchange on current issues of media use in the family, media education practice, or child protection in the digital world. In general, however, without funding support, such opportunities were regarded as limited in many countries.

#### 2.2.4 Monitoring and evaluation

Finally, under the topic of policy design, countries were asked to state whether they had a system in place for monitoring and evaluating policies related to children and the digital environment (Figure 10).







Q2.8: Is there a system in place for the monitoring and evaluation of policies relating to children and the digital environment?

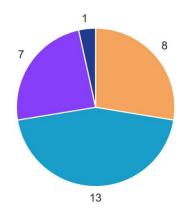




Figure 10: Monitoring and evaluation

Only a small number of countries were found to systematically monitor and evaluate policies on children and the digital environment.

- Eight countries state that there is a systematic and regular monitoring and evaluation process (CY, DE, HU, IT, LU, NL, PT, RO).
- In most countries, however, policies are monitored and evaluated but not systematically. 13 out of the 29 countries report this (AT, BE, CZ, EE, EL, ES, FR, IE, IS, LV, NO, SE, SI).
- Seven countries state that there is no mechanism for systematic monitoring or evaluation of policies on children and the digital environment (BG, DK, FI, HR, LT, PL, SK).
- One country (MT) stated that no information was available on the topic (survey response other).

As Figure 10 shows, monitoring and evaluation in most countries occurs on a caseby-case basis, according to the needs of individual initiatives. High-level







government strategies normally undergo evaluation in accordance with established government procedures. The example of the monitoring of the **Austrian** Youth Strategy illustrates this. In **Germany**, an evaluation of the Youth Protection Act (Jugendschutzgesetz) is planned three years after it enters into force with the Federal Government (Bundesregierung) reporting to the German Parliament (Deutscher Bundestag) on the results.

In some countries, systems are in place to monitor child protection systems in general and in the digital environment. Some countries refer to independent evaluation by bodies such as the Ombudsperson for Children and other similar agencies (HR, IT, RO). However, most countries do not have specific monitoring systems for children's safety in the digital environment.

#### 2.2.5 Topic summary: policy design

The following are some of the main points regarding overall levels of implementation under the heading of policy design:

- The availability of evidence to support policy-making regarding children's
  participation in the digital environment remains uneven. Approximately one
  quarter of countries collect data regularly and systematically on this topic. A
  further quarter collects some data on children's digital activity as part of
  broader surveys. However, in the remaining countries, the data is irregular
  and often quickly outdated.
- EU Member States, Iceland and Norway use a diverse range of information sources to support children's digital policy. Ten countries have dedicated information systems in place for this, while eight draw on a wide range of third-party sources. Expert committees or groups have been established in several countries to focus on specific issues, such as children's health and well-being, in the context of using digital technologies.
- Few countries have dedicated research programmes or funds for children and the digital environment. In approximately one-third of countries, there is little or no research funding available.





 Systematic evaluation of children's digital policies is rare, while government programmes usually benefit from ad hoc monitoring and evaluation, with occasional system-level policy reviews.

Figure 11 presents a summary of country responses indicating high, medium, and lower levels of implementation of policy design.

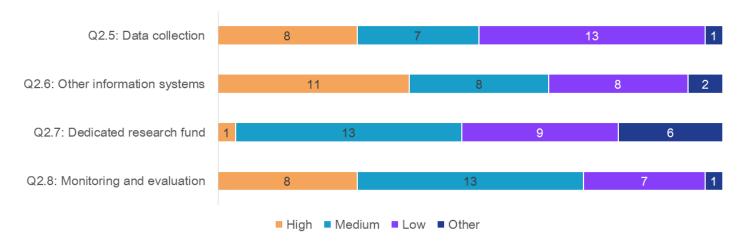


Figure 11: Topic summary – policy design







	High	Medium	Low	Other
Q2.5 Data collection	BE, DE, HU, IS, IT, LU, NO, SE	AT, CZ, DK, EE, FI, PL, PT	BG, CY, EL, ES, FR, HR, IE, LT, LV, MT, NL, SI, SK	RO
Q2.6 Other information	BE, CY, DK, ES, HU, IE, IS, IT, NO, SE, SI		BG, HR, LT, LU, LV, PL, RO, SK	DE, FI
Q2.7 Research fund	BE	CY, DE, EE, ES, HU, IE, IT, LU, MT, NO, SE, SI	AT, BG, CZ, HR, IS, LT, LV, PL, PT, SK	DK, EL, FI, FR, NL, RO
Q2.8 Monitoring and evaluation	CY, DE, HU, IT, LU, NL, PT, RO		BG, DK, FI, HR, LT, PL, SK	MT

Table 2: Topic summary - policy design

## 2.3 Policy governance

Examining policy governance, the BIK Policy Monitor addresses the management and coordination of policies at the national level, with a focus on three sub-topics:

- The coordination of national policies on children's digital use.
- The availability of a national coordination platform or vehicle for delivering initiatives within the framework of the BIK+ strategy.
- The existence of a national action plan or strategy for BIK-related policies with defined timelines, assigned responsibilities, and key performance indicators.





#### 2.3.1 Lead ministry or agency

Country respondents were first asked to indicate if there was a designated lead ministry or agency mandated to lead on policy development, recognising that BIK-related policies may sit across several ministries (Figure 12).

Q2.9: Is there a designated lead ministry or agency which is mandated to lead on policy development, recognising that responsibility for children's online safety and digital activity may sit across several ministries?

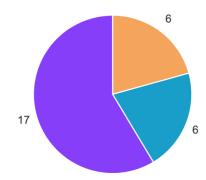




Figure 12: Lead ministry for policy development

Countries differ in their approach to policy development on BIK-related topics. Some have a central lead body, many have responsibilities spread across ministries, and others rely on informal arrangements.

- Six countries state that one central body, such as a central ministry office, public agency or regulatory authority, is formally mandated to lead on and develop policies, guidelines and programmes relating to children and the digital environment (CY, HR, IE, IT, NO, PT).
- A further six countries state that the lead ministry, public agency or regulatory authority for BIK-related policies is an informal arrangement depending on the requirements at a particular point in time (AT, HU, MT, NL, SI, SK).







 Over half, or 17 out of the 29 countries surveyed, report that policy development sits across a range of ministries and that there is no lead with specific assigned responsibility for developing government on policies, guidelines and programmes relating to children and the digital environment (BE, BG, CZ, DE, DK, EE, EL, ES, FI, FR, IS, LT, LU, LV, PL, RO, SE).

The following are some of the examples provided regarding policy coordination at the national level:

- **Denmark:** The protection of children in the digital environment is dealt with across a range of ministries. Overall, digitalisation is dealt with by the Ministry of Digital Government and Gender Equality. Protection of minors is dealt with more specifically in various areas across various ministries.
- **Germany:** Due to federalism, there is no single responsible ministry. The Federal Ministry of Family Affairs, Senior Citizens, Women, and Youth (BMFSFJ) leads on federal policies regarding the protection of children.
- **Italy:** While each ministry, agency, and public authority has its own responsibilities, the Ministry of Education is officially designated as the national point of reference for awareness-raising activities and education/training actions as the coordinator of the Safer Internet Centre.
- **Luxembourg:** In Luxembourg, more than one ministry, agency or body is responsible for coordinating policies addressing the BIK+ strategy, with four to six ministries involved.
- **Netherlands:** As the responsibility for children's online safety and digital activity is divided across several ministries, the responsibility may differ by specific topic. However, the Minister for Digitalisation (part of the Ministry of the Interior and Kingdom Relations) coordinates national policy on digitalisation, including children's online safety and digital activity policy.
- **Norway:** According to the National Strategy for a Safe Digital Upbringing, the Ministry of Children and Families has the overall coordinating responsibility for safe digital upbringing. The responsibility involves leading the work at the





ministry level, being the driving force behind policy development in the field, and coordinating with the departments concerned.

- **Slovenia:** The Ministry of Education at all levels ensures, encourages and promotes the safe children's use of the internet through public tenders for teacher training, development projects in the field of digital education, and direct funding through public institutes, universities and others.
- Spain: There are various public bodies, ministries, and agencies with competences in developing policies for a better internet for children. These include the Ministry of Digital Transformation and Public Service, the Ministry of Education and Vocational Training, the Ministry of Justice, the Home Office, the Ministry of Social Rights and Agenda 2030, and the Spanish AEPD, among others.
- Sweden: Policy development concerning children's online safety and digital
  activity happens across various ministries, depending on the subject matter,
  such as the Ministry of Social Affairs, the Ministry of Culture, and the Ministry
  of Finance.

#### 2.3.2 Coordination platforms

Country respondents were also asked if there is a clearly defined national coordination body or agency (for example, a national Child Online Safety Steering Committee or equivalent) that reports to the lead ministry and is mandated to coordinate policies, guidelines, and programme implementation (Figure 13).





Q2.10: Is there a clearly defined national coordination body or agency (e.g., a national Child Online Safety Steering Committee or equivalent) that reports to the lead ministry and is mandated to coordinate policies, guidelines, and programme implementation relating to children and the digital environment?

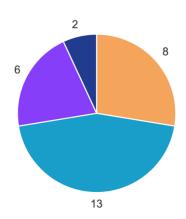




Figure 13: National coordination body

As shown in Figure 13, there is a lack of consistent coordination regarding policies for children and the digital environment. Only a few countries have formal coordination mechanisms; many rely on informal collaboration and in about one-fifth of countries, coordination is non-existent.

- Eight countries report the availability of a clearly defined coordination function that involves all relevant stakeholders and encompasses the crosscutting policy issues relating to children and the digital environment (CY, HU, IE, IS, IT, NO, PT, SK).
- Of the 29 countries in the survey, 13 noted that different departments and entities informally coordinate to contribute toward children's digital policies, guidelines and programmes (AT, BG, CZ, DE, DK, EE, EL, ES, FR, LU, MT, SE, SI).
- Six countries say there is no coordination mechanism in place. Policies, guidelines and programmes relating to children and the digital environment tend to be implemented independently (BE, HR, LT, LV, PL, RO).







 Two countries (FI, NL) state that coordination is determined by other overarching policy agendas such as national digital strategy or digital transformation.

Examples of national coordination platforms cited include the following:

- In Hungary, the Hungarian Governmental Information-Technology
   Development Agency is a public agency under the Ministry of Innovation and
   Technology. It supports digitalisation and plays a leading role in implementing
   key communication developments.
- In Ireland, a new independent online safety and media regulator, Coimisiún na Meán, has been established as the primary agency responsible for enforcing a new regulatory framework for online safety and regulating broadcast media and video-on-demand services.
- In Norway, according to the National strategy for a safe digital upbringing, the Norwegian Media Authority is responsible for coordinating safe digital upbringing at the directorate level.
- Portugal's National Commission for the Promotion of the Rights and Protection of Children and Young People (CNPDPCJ), in conjunction with other public authorities responsible for designing and implementing activities aimed at children, is the national coordination body mandated to coordinate policies, guidelines and programmes relating to children and the digital environment.
- In the Slovak Republic, the National Coordination Centre for Resolving the Issues of Violence against Children (NCC) coordinates the National Strategy for the Protection of Children in the Digital Environment to create and maintain communication with cooperating entities active in protecting children against violence.





#### 2.3.3 Availability of a national action plan

Given the diversity of arrangements and multiple policy stakeholders involved in policy development, countries were asked about the availability of a national action plan, strategy or equivalent to coordinate the implementation of government policy on children and the digital environment (Figure 14).

Q2.11: Is there a national action plan, strategy or equivalent in place that gives government policy on children and the digital environment defined timelines, assigned responsibilities and key performance indicators (KPIs)?

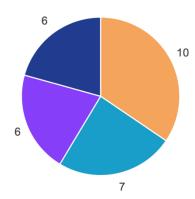




Figure 14: National action plan or strategy

Nearly one-third of countries have national action plans in place for children and the digital environment, while others report various separate initiatives.

- Ten countries state that there is a national action plan with defined timelines, assigned responsibilities, and key performance indicators (CY, HU, IE, IS, IT, MT, PT, RO, SI, SK).
- Seven countries refer to multiple programmes underway, though these programmes are not formulated as defined action plans (BG, DE, EL, ES, FO, FR, NO).





- Six additional countries report that their policies have yet to be developed into an implementable action plan (AT, BE, EE, LT, LV, SE).
- In the case of six further countries, various initiatives were reported to be underway, some are currently in development but not necessarily coordinated at the national level (CZ, DK, HR, LU, NL, PL; survey response other).

Examples of action plans referred to in submissions include:

- In **Hungary**, the Digital Child Protection Strategy of Hungary was developed to ensure that rules and measures for the protection of children are enforced more prominently than before and support conscious and value-creating internet use.
- In **Ireland**, Coimisiún na Meán published its inaugural Work Programme in June 2023. This prioritises online safety and the implementation of new regulatory frameworks governing how online service providers handle harmful and illegal content.
- In Italy, the Ministry of Education, acting as the coordinator of the Safer
  Internet Centre, develops an annual work programme involving ministries
  and authorities to promote a better internet for children which includes key
  performance indicators.
- In Portugal, the National Strategy for the Promotion of the Rights of the Child for the period 2021-2024 has defined accountabilities such as priorities, strategic and operational objectives, targets, and key performance indicators (KPIs). The National Strategy for Cyberspace Security 2019-2023 is likewise subject to an annual implementation assessment by the Council for Cyberspace Security.

In several countries, new implementation programmes are actively in development, as noted in examples such as **Croatia's** draft *National Programme for Children in the Digital Environment* 2024-2026, **Romania's** national strategy, **Protected Children**,





Safe Romania 2022-2027, and **Poland's** National Plan to Counter Crimes against Sexual Freedom and Decency Affecting Minors for 2023-2026.

The **Danish** government is preparing a white paper on child online protection, including possible new laws, and is introducing a quality programme to add technology education as an elective in primary schools. This aligns with the goals of the National Strategy for Digitalisation, which allocates significant funding to support technological understanding in primary education.

#### 2.3.4 Topic summary: policy governance

Findings concerning policy governance reveal that BIK-related policies are frequently fragmented and lack coordination:

- Policy developments across distinct areas of protection, empowerment, and active participation rarely involve a single point of leadership or coordination.
   Only six countries say that a central body, ministry, or agency is mandated to lead policy development on BIK-related matters.
- Coordination of delivery mechanisms is also similarly distributed across
  multiple areas of responsibility. Only seven countries say that a clearly
  defined coordination function is in place that involves all relevant
  stakeholders and encompasses the cross-cutting policy issues relating to
  children and the digital environment. 13 countries say coordination happens
  more informally. Exceptions to this were primarily apparent in the case of
  new policy initiatives with specific areas of focus, such as health and wellbeing in the digital environment.
- Less than a third of countries in the survey have developed a formal
  implementation action plan with defined timelines, assigned responsibilities,
  or key performance indicators (KPIs). Seven countries report that one or
  more programmes of action are underway, though these are less clearly
  defined in terms of timelines, assigned responsibilities, or KPIs.





Figure 15 summarises country responses to indicate high, medium, and lower levels of implementation in relation to policy governance.

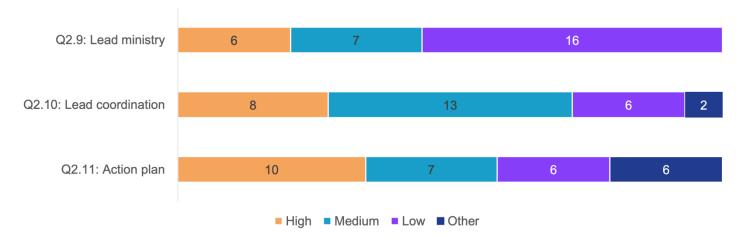


Figure 15: Topic summary – policy governance

	High	Medium	Low	Other
Q2.9 Lead ministry	CY, HR, IE, IT, NO, PT	AT, HU, MT, NL, SI, SK	BE, BG, CZ, DE, DK, EE, EL, ES, FI, FR, IS, LT, LU, LV, PL, RO, SE	_
Q2.10 Lead coordination	CY, HU, IE, IS, IT, NO, PT, SK	AT, BG, CZ, DE, DK, EE, EL, ES, FR, LU, MT, SE, SI	BE, HR, LT, LV, PL, RO	FI, NL
Q2.11 Action plan	CY, HU, IE, IS, IT, MT, PT, RO, SI, SK	BG, DE, EL, ES, FI, FR, NO	AT, BE, EE, LT, LV, SE	CZ, DK, HR, LU, NL, PL

Table 3: Topic summary – policy governance







## 2.4 Stakeholder involvement in BIK policy development

The importance of stakeholder involvement and knowledge exchange in policies to promote a better internet for children is recognised as an important aspect of policy development in the BIK+ strategy. Four aspects are addressed in this section of the BIK Policy Monitor:

- Opportunities for direct stakeholder involvement.
- Public consultation processes.
- Mechanisms available to support children's involvement.
- International dialogue and knowledge exchange.

#### 2.4.1 Stakeholder involvement

Aside from any national coordination platforms, country respondents were asked if they have a formal, government-led forum where relevant stakeholders can participate in policy discussions concerning children's participation in the digital environment (Figure 16). Policy stakeholders include government departments, civil society, public agencies, law enforcement, industry, and academia.







Q2.12: In addition to any national coordination body (referred to in 2.10 above), is there a formal, government-led forum in place for relevant stakeholders (e.g., various government departments, civil society, public agencies, law enforcement, industry, academia, etc.) to contribute to policy deliberation and development regarding children and the digital environment?

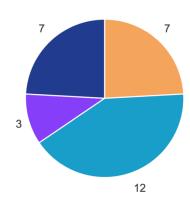




Figure 16: Stakeholder forum

While some countries have established multi-stakeholder forums to address children's digital policies, others utilise ad hoc groups or lack formal mechanisms for stakeholder involvement:

- Seven countries report that they have established multi-stakeholder forums to involve relevant groups regarding BIK-related policies (ES, HR, IT, MT, NO, PT, SK).
- Several ad hoc multi-stakeholder groups exist across different branches of government in twelve countries (BE, CY, CZ, DE, DK EE, FR, HU, IS, LT, PL, SI). These groups allow stakeholders to contribute to policy deliberation and development.
- Three countries indicate that a formal mechanism has yet to be created for stakeholder groups to contribute to policy deliberation and development (BG, LV, RO).





Seven further countries state that multi-stakeholder consultation happens
within the context of other areas of digital policy, for example, through a
digital skills forum, advisory boards for Safer Internet Centres (SICs), or
consultative groups established by the Ombudsman for Children (AT, EL, FI,
IE, LU, NL, SE).

Multi-stakeholder platforms can take a variety of forms, as the following examples show:

- In **Croatia**, a working group of key stakeholders has been formed to develop the National Programme for Children in the Digital Environment for 2024-2026.
- In Finland, the government has appointed a Child Advisory Board to promote the position and rights of children and cooperation between all relevant stakeholders.
- In Hungary, the communications regulator, the National Media and Infocommunications Authority, established the Internet Roundtable for Child Protection in 2014, a 21-member advisory board that promotes the protection of minors online and supports the authority's work.
- In **Italy**, the Ministry of Education has set up a government-led advisory board with relevant stakeholders, government departments, civil society, public agencies, law enforcement, industry and academia to develop policies regarding children and the digital environment.
- The **Norwegian** Media Authority has a Safe Use network where relevant actors in the field are invited to provide input on policy development.
- In **Portugal**, an inter-ministerial committee has been formed within the context of the National Strategy for the Rights of the Child for 2021-2024.
- **Slovakia** has an inter-ministerial working group on the National Strategy on the Protection of Children in the Digital Environment, comprising relevant ministries, public agencies, and academic expertise.







- Slovenia's new Strategic Council for Preventing Hate Speech, established in 2023 within the Prime Minister's office, is also designed as a forum for multistakeholder involvement and contribution to policy development. It consults widely with NGOs, national experts, state institutions, and independent agencies.
- **Spain's** proposed Committee of Experts to create a "safe digital environment for youth and children" will comprise up to 50 specialists from various fields, including academia, professionals, government and social organisations. Its function will be to analyse the impact of technologies on minors, considering both the risks and opportunities offered by the digital environment.
- In **Sweden**, government departments use civil society consultations (Sakråd) to discuss and hear the relevant stakeholders in a specific policy area.

It is also noteworthy that Safer Internet Centre advisory boards play a crucial role in fostering stakeholder dialogue in several countries:

- In the Czech Republic, the SIC coordinates activities between various NGOs, companies, and universities to promote prevention, intervention, and awareness of children's internet use.
- Similarly, in Greece, the SIC advisory board comprises major stakeholder representatives such as ministries, the Cybercrime Unit of the Greek Police, ISPs, academia, NGOs, and so on.
- In Malta, the advisory board facilitates stakeholder exchange regarding potential enhancements at the national level aimed at protecting all children in Malta from online abuse.

#### 2.4.2 Public consultation

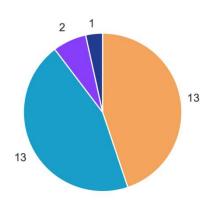
Country respondents were also asked about available consultation processes in which members of the public or other interested groups might contribute at different stages of the policy development process (Figure 17).







Q2.13: Are members of the general public consulted in the process of policy development?



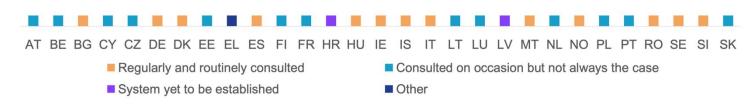


Figure 17: Public consultation

Most countries have well-established public consultation procedures, particularly for new legislation concerning children and digital environments, whether mandated by law or not.

- 13 countries report that members of the public are regularly and routinely consulted as part of the policy development process (BG, DE, DK, ES, HU, IE, IS, IT, MT, NO, RO, SE, SI).
- Another 13 countries state that members of the public are consulted on occasion during the development of new policies. However, this is not always the case (AT, BE, CY, CZ, EE, FI, FR, LT, LU, NL, PL, PT, SK).
- Two countries (HR, LV) state that a system has yet to be established whereby members of the public are routinely consulted when developing new policies.
- One further country (EL) states that consultation with the general public largely takes place through the Safer Internet Centre (survey response other).





The available mechanisms for public consultation as shown by responses are diverse:

- In **Ireland**, for instance, the regulator, Coimisiún na Meán, invited public feedback on its draft Online Safety Code for video-sharing platforms, which forms part of implementing the AVMSD.
- In **Slovenia**, public consultation includes publishing legislative proposals on the eGovernment webpage, a public portal for citizens of the Republic of Slovenia, and an electronic entry point for various services provided by state bodies or public administration bodies.
- In Spain, public consultation regarding children and the digital environment is common practice. Consultation processes typically involve releasing draft policies or legislative proposals for public review and feedback.

By contrast, in **Poland**, it was noted that due to the complex nature of regulating harmful content, the Ministry of Digital Affairs aims to convene specialist fora - academics, lawyers, representatives of NGOs, and so on - for a joint discussion of definitions, the subject and object scope of regulation, as well as possible technical measures, prior to public consultation.

In the **Netherlands**, it was noted that the general public is generally not consulted concerning new policies not laid down in legislation, such as policy instruments (soft law).

### 2.4.3 Young people's involvement in policy-making

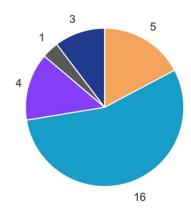
The BIK+ strategy emphasises young people's active involvement and the importance of respecting young people's views in shaping the online world. For example, BIK+ envisages a child-led strategy evaluation every two years, ensuring young people have a direct voice in assessing how it is working.





Country respondents were asked to describe the level of involvement children and young people have in policy-making on BIK-related issues in their country (Figure 18).

Q2.14: Which of the following best describes the involvement of young people in policy-making on the topic of children's digital activity in your country?



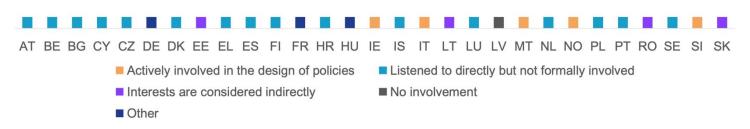


Figure 18: Involvement of young people in policy-making

Countries have varying levels of child involvement in shaping digital environment policies, ranging from active participation with dedicated structures to indirect consideration of children's interests. Most countries report that they listen to children's input without directly including them in decision-making.

- Five countries state that children are actively involved in designing policies regarding young people and the digital environment (IE, IT, MT, NO, SI). Specially designed structures are in place for this purpose.
- Just over half, or 16 out of the 29 countries surveyed, report that children are listened to directly in developing policies on the digital environment (AT, BE, BG, CY, CZ, DK, EL, ES, FI, HR, IS, LU, NL, PL, PT, SE). This may involve





- hearings, consultations, and specific surveys on the topic. While their views are heard, children are not formally involved in decision-making.
- In four countries (EE, LT, RO, SK), children's interests are considered indirectly, for example, through analysis of existing surveys or other available data.
- One country (LV) states that children and young people are not involved or indirectly heard in national policy-making.
- Three further countries (DE, FR, HU) state that consultation with young people takes place within larger national structures, for example, within the education system, but may not be specifically focused on digital policy topics (survey response other).

Examples of children's participation in policy-making include the following:

- In **Austria**, Reality Check is the system for incorporating children's and young people's views into the **Austrian Youth Strategy**. It sets a minimum level of participation and may be carried out by involving young people themselves, involving organisations with youth expertise, or integrating youth-related findings.
- In Croatia, the Ombudsperson for Children supports the participation and inclusion of children in the creation and drafting of regulations, policies and practices. It has an advisory body; a network of young counsellors comprising 20 children, aged 12 to 17, who are consulted before sending recommendations and proposals of laws and programmes.
- In **Germany**, children's participation forms part of the National Action Plan for Child and Youth Participation.
- In **Ireland**, the regulator, Coimisiún na Meán, established a Youth Advisory Committee to advise on policies such as its draft online safety code. The committee currently includes representatives from nine national organisations representing children and young people and nine individuals under 25.







- In the Netherlands, a Youth Council on digitalisation was established in September 2023, together with UNICEF. Children aged 11 to 17 advise the Minister for Digitalisation on relevant topics they encounter in their daily lives. The outcomes are fed into national policy on protecting children in the digital world.
- In Norway, most public agencies conduct youth panels, for example, the Digiung-programme under the Directorate for Children, Youth and Family Affairs (digitisation of services for young people). The Norwegian Media Authority has also established a youth panel for its work on the action plan for a safe digital upbringing.

Safer Internet Centre youth advisory panels are also key participation platforms for including children and young people's voices:

- The Czech Republic's SIC, for example, has a youth panel (for children), which has recently been restructured to be more effective and responsive to children's needs in the digital environment and to ensure close links with EU policies.
- In **Greece**, children are involved in activities of the Safer Internet Centre through a youth panel. The panel comprises members from around the country, including children of various educational levels and regions. Members also participate actively in Safer Internet Day (SID) celebrations and European events such as the Safer Internet Forum (SIF), the Internet Governance Forum (IGF), EuroDIG, or other opportunities.
- In **Lithuania**, the Safer Internet Centre has assembled an active youth council (Lithuanian SIC Young Ambassadors programme). However, its role does not involve developing or implementing policies in Lithuania.
- In **Luxembourg**, members of BEE SECURE Kids (8- to 12-years-old) and the youth panel (13- to 18-years-old) share their opinions on current issues (such as trends and policies) with the SIC, which forwards these opinions to policymakers as appropriate.







#### 2.4.4 International knowledge exchange

Finally, country respondents were asked about opportunities for dialogue and knowledge exchange at the international level regarding policy development issues concerning children in the digital environment (Figure 19).

Q2.15: Are there opportunities for policy makers to participate in international knowledge exchange activities regarding children and the digital environment?

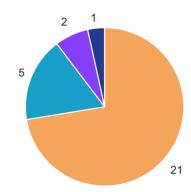




Figure 19: International knowledge exchange

Most countries actively engage in international knowledge exchange on digital policies for children:

- Most countries state that policymakers actively participate in various EU-level and other international inter-governmental groups related to digital policies for children. 21 countries say this is the case (AT, BE, CY, DE, DK, EE, ES, FI, FR, HR, HU, IE, IS, IT, MT, NL, NO, PT, SE, SI, SK).
- Five countries (BG, CZ, LT, LU, PL) report fewer opportunities to participate in international knowledge exchange on digital policies for children.
- Two countries (EL, LV) report that policymakers are not actively involved in international knowledge exchange activities on this topic and one country





(RO) reported that no information is available on this topic (survey response other).

Most countries refer to opportunities provided by the European Commission, its Digital Agenda for Europe, and the Better Internet for Kids programme, including the Insafe and INHOPE networks.

Most respondents underlined the value of participation in the European Commission's Expert Group on Safer Internet for Children as a valuable forum for exchanging good practices and promoting dialogue among Member States while encouraging coordination and synergies between national and EU policies. The Media Literacy Expert Group was also mentioned in this context.

The Working Group on Digital Education: Learning, Teaching and Assessment (DELTA) was also mentioned as a relevant and important opportunity for policy dialogue on this topic, as are other boards representing relevant regulatory functions at the EU level, including the European Regulators Group for Audiovisual Media Services (ERGA), the European Multidisciplinary Platform Against Criminal Threats (EMPACT), and the EU Network for Children's Rights.

The European Parliament also affords opportunities for policy dialogue through relevant resolutions on matters concerning children and the digital environment, which also present promising opportunities.

Finally, working groups of international organisations, including the Council of Europe (CoE), OECD, UNICEF, and the International Telecommunication Union (ITU), were also cited as opportunities for policymakers to engage internationally.

#### 2.4.5 Topic summary: stakeholder involvement

Engaging widely with stakeholder groups is a cornerstone of good practice in developing policies for children and the digital environment:

 Most countries report relatively high stakeholder engagement and consultation on digital policies affecting children. However, only seven







countries have dedicated mechanisms to support this, such as a regular multi-stakeholder forum. In eleven countries, arrangements for stakeholder exchange are ad hoc, while three countries say they have yet to develop a mechanism for this.

- Many interesting examples are highlighted among countries where stakeholder groups are convened around specific topics, and which are established for a defined period to report and make recommendations on areas where new laws or regulations are under consideration.
- Public consultation is widely represented, particularly regarding laws and regulations under consideration. Most countries implement consultation measures; in a third of cases, this is a regular and routine occurrence.
- Children also have various opportunities to contribute to policy development on digital policies that may affect them. However, only in five countries are children said to be actively involved in the policy development process and have specially designed structures to support this. In most countries, children's involvement is more indirect and does not involve participation in decision-making.
- Finally, nearly all countries report high levels of international dialogue and exchange on BIK-related policies. EU expert groups, the Better Internet for Kids programme, and working groups provide key opportunities for countries to exchange good practices and debate European and international policy development.

Figure 20 below summarises country responses to indicate high, medium, and lower levels of implementation regarding stakeholder involvement.





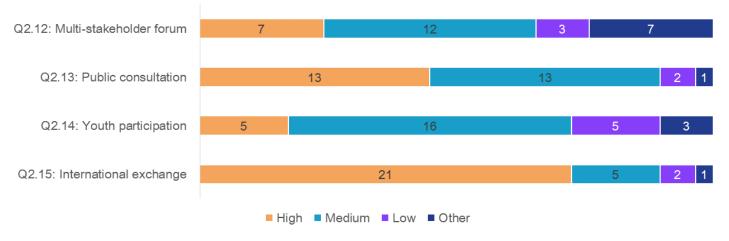


Figure 20: Topic summary – stakeholder involvement

	High	Medium	Low	Other
Q2.12 Multi-stakeholder forum	ES, HR, IT, MT, NO, PT, SK	BE, CY, CZ, DE, DK EE, FR, HU, IS, LT, PL, SI	BG, LV, RO	AT, EL, FI, IE, LU, NL, SE
Q2.13 Public consultations	BG, DE, DK, ES, HU, IE, IS, IT, MT, NO, RO, SE, SI	AT, BE, CY, CZ, EE, FI, FR, LT, LU, NL, PL, PT, SK	HR, LV	EL
Q2.14 Youth participation	IE, IT, MT, NO, SI	AT, BE, BG, CY, CZ, DK, EL, ES, FI, HR, IS, LU, NL, PL, PT, SE	EE, LT, LV, RO, SK	DE, FR, HU
Q2.15 International exchange	AT, BE, CY, DE, DK, EE, ES, FI, FR, HR, HU, IE, IS, IT, MT, NL, NO, PT, SE, SI, SK	BG, CZ, LT, LU, PL	EL, LV	RO

Table 4: Topic summary – stakeholder involvement







# Chapter 3: BIK+ actions in EU Member States, Iceland and Norway

Chapter 3 presents findings on the activities and initiatives undertaken by EU Member States, Iceland and Norway as per the policies discussed in Section 2. The BIK+ strategy includes various actions that the European Commission proposes to achieve the strategy's goals. Member States and industry actors are also encouraged to contribute to the implementation of the strategy by taking various supportive actions. The BIK Policy Monitor focuses on the various action points from the strategy, organised under the three pillars of BIK+, which are safe digital experiences (Pillar 1), digital empowerment (Pillar 2), and active participation, respecting children (Pillar 3).

## 3.1 Pillar 1 - safe digital experiences

The BIK+ strategy incorporates actions to ensure a safe online environment for children in European countries. This is achieved through various means, many in tandem with EU laws and regulations. Relevant EU laws and regulations include the Digital Services Act (DSA), the Audiovisual Media Services Directive (AVMSD), and the General Data Protection Regulation (GDPR), each of which contains provisions for children's online safety.

Other legislation, such as the Unfair Commercial Practices Directive (UCPD), the Artificial Intelligence (AI) Act, and the Regulation establishing a framework for a European Digital Identity (EUDI), are also relevant. The compendium of relevant BIK+ legislation and policy accompanying the BIK+ strategy highlights the many laws and self- and co-regulatory measures relevant to policies on children and the digital environment. Accordingly, there are numerous opportunities to develop national-level rules and guidelines, including national legislation to give effect to EU laws, strategies for the delivery of programmes nationally, and guidance that describes country-specific approaches to implementation.





Under Pillar 1, safe digital experiences, ten specific action points are reviewed. These are grouped under the headings of 3.1.1 Responses to EU laws, 3.1.2 Addressing harmful online content, 3.1.3 National laws on harmful conduct, and 3.1.4 Age verification and digital identity systems. Country respondents were asked in each instance to confirm the status of the action, indicating whether a particular item was in place, currently in development, not in place, or other, as appropriate.

#### 3.1.1 Responses to EU laws

As reflected in the many policy developments reported in Chapter 2, the BIK+ strategy occurs at a time when major new EU laws are coming into effect, shaping national responses and raising the profile of policy measures to create safer online environments for children. This section reports on three items: national enabling legislation for the DSA, national codes of conduct for digital service providers, and commercial codes of practice. Note that this reflects the situation as of the end of February 2024 when data collection closed.

Figure 21 below summarises the national responses to EU laws in these areas, followed by a brief description of various forms of national implementation.

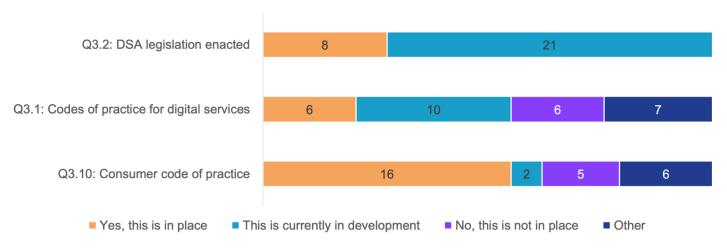


Figure 21: Responses to EU laws (as of the end of February 2024)







	In place	In development	Not in place	Other
Q3.2: DSA legislation enacted	AT, DK FI, HU, IE, IT, LV, PT	BE, BG, CY, CZ, DE, EE, EL, ES, FR, HR, IS, LT, LU, MT, NL, NO, PL, RO, SE, SI, SK	_	_
Q3.1: Codes of practice of digital services	DE, IE, NL, PT, RO, SE	BE, BG, ES, FR, HR, HU, IT, MT, NO, SI	EE, IS, LU, LV, PL, SK	AT, CY, CZ, DK, EL, FI, LT
Q3.10: Consumer code of practice	BE, BG, CZ, EE, ES, FI, FR, HR, HU, IS, IT, LT, NL, NO, PL, SE	CY, SI	EL, LV, MT, PT, SK	AT, DK, DE, IE, LU, RO

Table 5: Responses to EU laws (as of the end of February 2024)

## a) National legislation for the DSA

The BIK+ strategy regards the DSA as "one of the cornerstones of the new rules, obliging companies to put the interests of children at the forefront of their considerations" (p. 1). As an EU Regulation, the DSA applies directly in all EU Member States. However, some of its provisions require national legislation to take effect, such as designating and empowering a competent authority, known as the Digital Services Coordinator (DSC), to supervise and implement the DSA.

In this context, country respondents were asked whether they had passed legislation for this purpose:

 Eight countries report that, as of February 2024, such legislation was in place (AT, DK FI, HU, IE, IT, LV, PT), while 21 countries state that it was in development (BE, BG, CY, CZ, DE, EE, EL, ES, FR, HR, IS, LT, LU, MT, NL, NO, PL, RO, SE, SI, SK).





 Most countries report that relevant competent authorities have been identified in preparing legislation, meeting the EU deadline of 17 February 2024.

## b) Codes of conduct for digital service providers

Codes of conduct play an important role in the EU's better internet policies. The BIK+ strategy refers to the Code of Conduct on Countering Illegal Hate Speech Online and the Code of Practice on Disinformation as relevant instruments. It also includes a commitment to facilitate a comprehensive EU code of conduct on age-appropriate design (p. 9) to ensure the privacy, safety and security of children when using digital products and services. Children will be involved in shaping the EU Code (p. 16).

Additionally, under AVMSD, EU Member States must ensure that video-sharing platforms take appropriate measures to protect minors as set out under Article 28b AVMSD. In this context, Member States are encouraged to use co-regulation and to foster self-regulation through codes of conduct to give effect to such protections.

In the BIK Policy Monitor, countries were asked if there were codes of practice/codes of conduct for digital service providers at the national level regarding children's online safety, for example, in relation to AVMSD Art28b or other EU laws:

- Six countries report that there are relevant codes in place (DE, IE, NL, PT, RO, SE).
- A further ten countries indicate that this was currently under development (BE, BG, ES, FR, HR, HU, IT, MT, NO, SI).
- Six countries also indicate that this was not available (EE, IS, LU, LV, PL, SK). The remaining seven countries point to other relevant activities, but these did not strictly qualify as a code of practice (AT, CY, CZ, DK, EL, FI, LT).

Relevant codes referred to by countries include obligations and guidance, some of which are binding, contained in **Germany's** Youth Protection Act (JuSchG),







Ireland's draft Online Safety Code, the **Netherlands'** Code for Children's Rights, Portugal's Media Education Framework (and associated frameworks for human rights and for health education), **Romania's** Regulatory Code of the Audiovisual Content and provisions aimed at protecting children from depictions of violence and pornography in the **Swedish** Radio and Television Act.

Other relevant activities under this heading include the non-binding ethical guidelines released by the **Danish** Media Council for Children and Young People, regulations under consideration in **Norway** regarding the protection of minors from harmful online content, and proposals by regulators in **Spain** to promote coregulatory codes of conduct, including a Proposal for a State Treaty to protect minors on the internet and social networks.

#### c) Consumer codes

The BIK+ strategy acknowledges that children are more active and independent as digital consumers and may be exposed to various consumer or contract risks. Countries were also asked if there was a code of conduct/code of practice at the country level regarding the labelling of commercial content on digital services, such as influencer-based marketing or which seeks to uphold children's consumer rights:

- 16 countries report that there is such a consumer code of practice in place on this topic (BE, BG, CZ, EE, ES, FI, FR, HR, HU, IS, IT, LT, NL, NO, PL, SE).
- Two other countries (CY, SI) indicate that active plans are in development for such a code, while six other countries pointed to other relevant activities.
- Just five countries state that there was no such code in place (EL, LV, MT, PT, SK). The remaining six countries point to other relevant activities, but these did not strictly qualify as a consumer code of practice (AT, DK, DE, IE, LU, RO).

As these findings illustrate, codes of conduct regarding commercial content are well-established in many EU Member States. Many of these codes draw on the experience of drafting such codes in the context of AVMSD rules for broadcasting and on-demand content.







Many countries have also developed guidance on social media marketing practices. These include, for example, the Code of Ethics developed by the advertising industry in Austria, guidelines from the Danish Consumer Ombudsman regarding marketing towards children and minors, guidelines published by Germany's state media authorities on the handling of labelling obligations deal, in particular, with advertising on social media, guidelines from Hungary's Competition Authority, guidance from Poland's Office of Competition and Consumer Protection (UOKiK), and consumer guidance from Slovenia's Information Commissioner.

Examples of rules and guidelines addressing the activities of online influencers include the following:

- In 2022, the Flemish Media Regulator (VRM) published a new Content Creator Protocol in **Belgium**. This protocol contains rules that influencers must follow when sharing commercial video communication. This new regulation is in addition to the existing Influencer Marketing Guidelines and the advertising rules from the Belgian Code of Economic Law.
- In **Iceland**, the Media Commission is responsible for promoting media literacy and protecting children from harmful content online or in the media, including potentially harmful commercial content such as content promoting harmful substances (Article 28) and protecting children against inappropriate advertisements and online shopping (Article 38).
- In **Ireland**, in addition to statutory provisions that address misleading commercial practices, the competition authority and the advertising industry have issued joint guidance to clarify commercial content labelling on social media. This strongly advocates the use of clear hashtags for labelling commercial communications. It addresses paid promotion, items 'gifted' by brands or PR agencies, the advertising of own-brand products and services, as well as the activities of influencers.
- In **Italy**, the Communications Authority has recently adopted guidelines that define a set of rules aimed at influencers. The provisions concern, in particular, measures regarding commercial communications, protection of







fundamental rights of the person, of minors, and the values of sport, providing a mechanism for modifying or ordering content removal. In the case of product placement, influencers are required to label the advertising nature of the content in an immediately recognisable way.

- In the Netherlands, the self-regulatory body for advertising (SRC) has
  developed the Advertising Code for Social Media & Influencer Marketing
  (RSM) or Stichting Reclame Code. While non-statutory, registration is
  obligatory for certain influencers with large followings and who are active on
  major social media platforms.
- In Norway, the Norwegian Media Authority has published binding guidelines on the labelling of marketing within YouTube videos. Additionally, the Norwegian Consumer Protection Authority has issued guidance on advertising in social media. The self-regulatory body, the Influencer Marketing Committee (FIM), has also issued non-statutory guidelines and codes of conduct related to responsible marketing practice, addressing issues of body-image pressure.

## 3.1.2 Addressing harmful online content

Under AVMSD, video-sharing platforms must implement measures to protect minors from harmful online content, which is defined as content that may impair their physical, mental, and moral development. The strictest measures apply to the most harmful content, such as gratuitous violence and pornography.

The DSA does not define the term harmful content, recognising that it "is a sensitive area with serious implications for the protection of freedom of expression" (Explanatory Memorandum to the draft Digital Services Act, COM(2020) 825 final 2020/0361 (COD), p. 11). However, under the DSA, providers of online platforms that are accessible to minors must put in place appropriate measures to ensure "a high level of privacy, safety and security of minors on their service" (DSA Article 28).





In this context, countries were asked about available definitions, procedures for disabling access or removal of harmful content, and whether there was a complaint mechanism available for children to report harmful content.

Figure 22 summarises national responses to addressing harmful online content, followed by a brief discussion of various forms of national implementation.

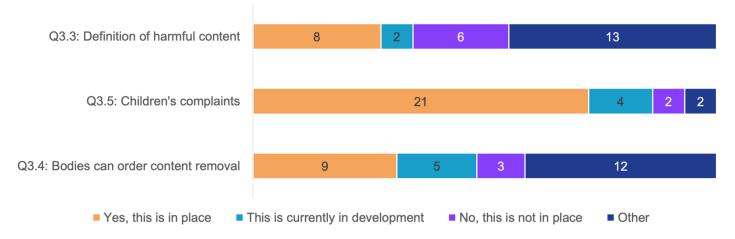


Figure 22: Actions to address harmful online content





	In place	In development	Not in place	Other
Q3.3: Definition of harmful content	DE, EL, IE, IS, IT, LT, MT, PT	PL, SI	EE, ES, FR, HR, LV, SK	AT, BE, BG, CY, CZ, DK, FI, HU, LU, NL, NO, RO, SE
Q3.5: Children's complaints	AT, BE, BG, CY, CZ, DE, DK, EE, EL, ES, FR, HU, IS, IT, LT, LV, MT, PL, PT, RO, SK	HR, IE, NL, SI	FI, SE	LU, NO
Q3.4: Bodies can order content removal	DE, DK, FR, HU, IE, IT, LT, PL, SI	AT, FI, HR, LU, MT	NL, NO, SE	BE, BG, CY, CZ, EE, EL, ES, IS, LV, PT, RO, SK

Table 6: Actions to address harmful online content

#### a) Defining harmful online content

Countries were asked if a definition of harmful online content is included in laws, regulations or policies at the national level. There was a wide diversity in how countries responded to the topic of harmful online content, as shown in Figure 22 (above):

- Eight countries indicate that a relevant definition is in place (DE, EL, IE, IS, IT, LT, MT, PT), and two countries indicate that this was in development (PL, SI).
- Six countries state that this is not in place (EE, ES, FR, HR, LV, SK).
- 13 countries point to other relevant features of national rules and guidelines (AT, BE, BG, CY, CZ, DK, FI, HU, LU, NL, NO, RO, SE).

Precise definitions of harmful online content are scarce, even among countries with national laws addressing this issue:







- In **Germany**, providers of internet platforms must take precautionary measures under the Youth Protection Act (JuSchG), among other things, to protect the personal integrity of children and young people. These precautionary measures, which may include reporting systems, secure default settings, references to provider-independent advice and many more, are subject to specific requirements that are more precisely differentiated.
- **Ireland's** draft Online Safety Code identifies specific types of harmful content for which designated providers must implement measures to restrict access. Harmful content here refers to cyberbullying, online content that promotes or encourages a feeding or eating disorder, and online content that promotes or encourages self-harm or suicide.
- In **Portugal**, rather than having a specific definition of harmful content, various laws address different forms of harmful online behaviour. Specific legal provisions aim to safeguard individuals' right to privacy and family intimacy. Additionally, there are legal measures to establish effective guarantees against abusive use of information relating to individuals and families, reinforcing the protection of privacy rights in the digital realm.

## b) Handling children's complaints and content removal

Countries were asked if there was a process in place by which a child might complain to an administrative body (for example, a government ministry or agency) about the availability of potentially harmful online content:

- 21 countries state that mechanisms are available to handle children's complaints (AT, BE, BG, CY, CZ, DE, DK, EE, EL, ES, FR, HU, IS, IT, LT, LV, MT, PL, PT, RO, SK).
- Four countries highlight new measures in development for this purpose (HR, IE, NL, SI).
- Two countries (FI, SE) state that no facility was available, while two further countries (LU, NO) point to other facilities that children may access but which are not specifically a children's helpline (survey response other).







Countries were also asked if such administrative bodies had the power to order the removal or disabling of access to online content that may be potentially harmful to children:

- Nine countries indicated that arrangements are in place for this purpose (DE, DK, FR, HU, IE, IT, LT, PL, SI), five countries stated that this was in development (AT, FI, HR, LU, MT), and three stated this was not in place (NL, NO, SE).
- Twelve countries highlighted other procedures related to online content removal, principally with reference to law enforcement powers with respect to illegal content (BE, BG, CY, CZ, EE, EL, ES, IS, LV, PT, RO, SK).

Examples of complaints-handling mechanisms referred to by countries include the following:

- In **Austria**, there are ten Children and Youth Ombuds Offices one in each of the nine federal states in Austria and one at the federal level. Children and young people can contact these offices regarding every matter of concern, including harmful online content.
- In the Czech Republic, it is reported that children may address any matters
  of concern with the Authority for Social and Legal Protection of Children
  (OSPOD), file a complaint with the police or the Ombudsman, as well as with
  voluntary services such as the Safer Internet Centre's "STOP online" hotline,
  and its Safety Line.
- In **Estonia**, a child may report potentially harmful content to the Child Helpline 116 111 via phone or online. According to the Child Protection Act, the Social Insurance Board is obliged to maintain a child helpline service and ensure its availability and quality for children, parents, and caregivers.
- In **Hungary**, online content can be reported to the Internet Hotline operated by the National Media and Infocommunications Authority (NMHH), if it is suspected that it is illegal or harmful to the development of minors. In the past 13 years, the service handled more than 17,000 reports. Where the







hotline determines that there is a likelihood of online abuse based on the information in the report, it will contact the service provider (content or hosting provider) to request investigation of the potentially infringing content.

- In Malta, the helpline has a trusted flagger status with numerous social media platforms which facilitates its ability to assist young people in the removal of potentially harmful content by promptly notifying the respective platforms thereof.
- In **Romania**, as part of the "Caring for Children" government programme, the Special Telecommunications Service (STS) has made the 119 telephone number operational. This number can be used nationally for reporting cases of abuse, neglect, exploitation, and any other forms of violence against children, including online violence. Calling 119 is free of charge and is available on any fixed or mobile network. The service is operated by counsellors working in social assistance and child protection departments.
- In Spain, there are various processes through which a child can report
  potentially harmful online content to administrative bodies. These include the
  AEPD Priority Channel, a specific channel for reporting harmful content
  affecting minors that allows for anonymous reporting through a simple online
  form. The National Institute of Cybersecurity (INCIBE) Cybersecurity Helpline
  017 also provides assistance and guidance on cybersecurity, including the
  reporting of harmful online content.

On both topics, regarding handling children's complaints and disabling access or removal of content, most countries referred to existing national measures, such as hotlines for reporting illegal content and the corresponding powers of law enforcement and review by the courts. The precise arrangements vary according to national legislation.

#### 3.1.3 National laws addressing harmful conduct

The BIK+ strategy highlights the risks posed to children by cyber violence, including non-consensual sharing of intimate content and cyberbullying. So-called







'revenge porn' is an example of content that requires rapid processing by digital service providers, particularly if flagged by children. According to the BIK+ strategy, this is an example of a systemic risk that, under the DSA risk management framework, requires specific attention (p. 6).

Meanwhile, cyberbullying remains the most reported topic to SIC helplines in the last decade. In this context, the BIK+ strategy seeks to provide additional support through enhanced cooperation with Safer Internet Centres, helplines, and further policy recommendations related to cyberbullying and well-being at school (p. 10).

A summary of national laws addressing harmful online conduct is given in Figure 23 below.

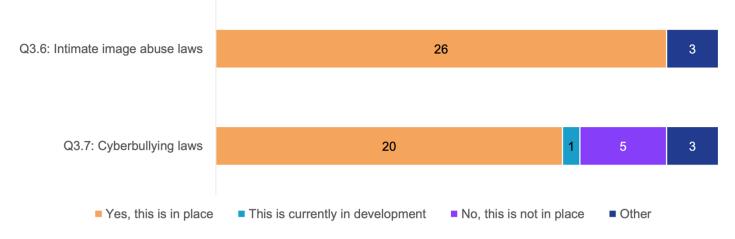


Figure 23: Actions to address harmful online conduct





	In place	In development	Not in place	Other
Q3.6: Intimate image abuse laws	AT, BE, BG, CY, CZ, DE, DK, EE, EL, ES, FR, HR, IE, IS, IT, LT, LV, MT, NL, NO, PL, PT, RO, SE, SI, SK	_	_	FI, HU, LU
Q3.7: Cyberbullying laws	AT, BE, CY, CZ, DE, EE, ES, FI, FR, EL, HR, HU, IE, IT, LT, MT, NO, PT, RO, SK	SI	BG, DK, IS, LV, NL	LU, PL, SE

Table 7: Actions to address harmful online conduct

#### a) Laws to address non-consensual sharing of intimate content

In the BIK Policy Monitor, country respondents were asked about national/regional laws, regulations or policies in place to protect children and young people from both intimate image abuse and cyberbullying. In both instances, most countries indicated that national laws were in place on these topics, making this, along with the presence of children's helplines, the aspect of Pillar 1 most implemented among EU Member States, Iceland and Norway.

All countries state that the issue of intimate image abuse is addressed in some form under national laws:

 26 countries report that there are relevant laws or policies in place to address intimate image abuse (AT, BE, BG, HR, CY, CZ, DE, DK, EE, EL, ES, FR, IE, IS, IT, LT, LV, MT, NL, NO, PL, PT, RO, SE, SI, SK). These include both new laws and policies developed to address this issue, as well as amendments to existing laws for this purpose.





• Three countries (FI, HU, LU) refer to other more general laws in place, such as the criminal code, to address intimate image abuse (survey response other).

Responses vary between those countries where intimate image abuse is treated under existing laws, which, for example, outlaw the production or handling of child sexual abuse material (CSAM) and those where a specific offence of non-consensual sharing of intimate content has been created. The following is a sample of the latter, where countries have developed new measures:

- In **Belgium**, a new law on revenge porn was developed in 2019. In addition, new sexual offences were added to the Penal Code in 2021.
- In **Finland**, the Criminal Code contains a description of the non-consensual dissemination of sexual images, which describes that an image, video or any other visual recording must not be shown or disseminated in such a way that it significantly violates another person's right to sexual self-determination.
- In **France**, intimate image abuse is treated under the Penal Code under updated articles dealing with Invasion of Privacy.
- In Iceland, statutory amendments to the Penal Code were implemented in 2021 to update laws to include digital sexual violence. The Act includes amendments to provisions of the General Penal Code concerning sexual offences on the one hand, and violation of personal privacy on the other, and was prompted by increased digital sexual violence in Icelandic society.
- In **Ireland**, intimate image abuse was outlawed in the Harassment, Harmful Communications and Related Offences Act 2020, known as Coco's Law, which provides for offences related to the non-consensual distribution of intimate images (Intimate Image Abuse). The law criminalises the sharing of, or threatening to share, intimate images of a person without their consent, with or without intent to cause harm to the victim.
- In the **Netherlands**, revenge porn can be prosecuted via Article 139h of the Criminal Code (since January 1, 2020). It is currently still regarded as a crime







against public order, but after the entry into force of the Sexual Offences Act, it will be regarded as a sexual offence.

- In **Romania**, intimate image abuse is regulated by Law 171/2023, amending and supplementing the Penal Code. It is not a separate offence when the victim is a minor, but it is an aggravating circumstance.
- In Spain, Article 197.7 of the Spanish Penal Code criminalises the disclosure
  of intimate images without the consent of the individuals involved. This
  provision aims to protect individuals, including children and young people,
  from the unauthorised sharing of private and sensitive content. Offenders
  may face criminal charges for violating this provision, including fines and
  imprisonment.

#### b) Laws to address cyberbullying

A similar variation in responses to the issue of cyberbullying is evident, though targeted initiatives are available in some countries:

- 20 countries overall report that there are national laws and policies that address cyberbullying (AT, BE, CY, CZ, DE, EE, ES, FI, FR, EL, HR, HU, IE, IT, LT, MT, NO, PT, RO, SK) and one country (SI) reports a law currently in development.
- Five countries report that this is not in place (BG, DK, IS, LV, NL).
- Three countries (LU, PL, SE) report less direct policy coverage or refer to more general laws under which this may be addressed (survey response other).

A sample of initiatives include the following:

• In **Austria**, in 2015, the criminal offence of cyberbullying was first introduced in Sect. 107c of the Criminal Code. The provision was recently amended by the Hate on the Net Combating Act (HiNBG) (Federal Law Gazette I 2020/148; in force since 1 January 2021). The most important change was







deleting the element of continued commission of the offence in Sect. 107c CC to be able to prosecute even a single upload (for example, of a nude image).

- In **Estonia**, the Violence Prevention Agreement 2021-2025 covers the
  prevention and combating of various forms of interpersonal violence against
  children, including the prevention of violence in the digital environment. The
  Agreement outlines increased support for prevention and support, and
  strengthened investigative powers.
- In **France**, relevant anti-bullying laws have been amended as of March 2022 and now include any bullying situation committed online and towards minors.
- In Italy, Law 71 of 2017 was established to combat cyberbullying in all its manifestations. Law 71 gives the Ministry of Education the task of coordinating an inter-ministerial table that creates an action plan for activities against cyberbullying every two years.
- In **Romania**, cyberbullying is addressed comprehensively by the National Strategy for Protection and Promotion of Children's Rights Protected Children, Safe Romania 2022-2027 approved by Governmental Decision no 969/2023.

Most countries also refer to obligations under national education laws to create safe educational environments conducive to good physical and psychosocial health, well-being and learning. This, in turn, requires schools to have targeted policies to address bullying and a zero-tolerance approach to violations such as bullying, violence, discrimination and harassment.

# 3.1.4 Age verification and digital identity systems for minors

In the BIK+ strategy, it is noted that at the time of publication, despite existing EU law (AVMSD and GDPR), age verification mechanisms and parental consent tools were still ineffective (p. 6). Hence, new measures to support effective age verification methods that are secure and privacy-preserving, in line with the eID proposal, have been introduced by the EC (p. 12). Additionally, the Commission will issue a request for a European standard on age verification (p. 10). The BIK+







strategy also notes that under the DSA, very large online platforms (VLOPs) will have to adopt targeted measures, including the use of age verification, as part of their risk management. One such possible method is the Regulation establishing a framework for a European Digital Identity (eID) which could enable minors, where national laws allow, to use the Digital Identity Wallet to prove their age without disclosing other personal data (p. 4).

Against this background, country respondents were asked if national/regional laws, technical standards or policies are in place regarding age verification mechanisms, specifically to restrict minors from accessing adult online content services. Secondly, countries were asked if digital identity systems were available for minors under national eID schemes.

A summary of responses to age verification and digital identity systems is given in Figure 24 below.

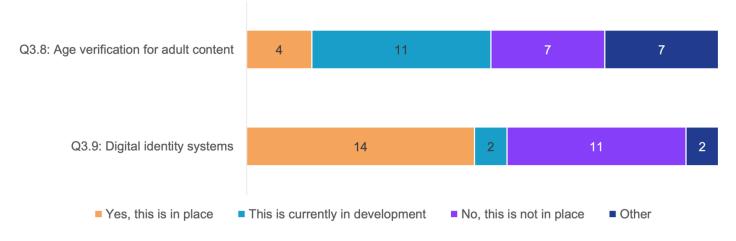


Figure 24: Actions regarding age verification and digital identity





	In place	In development	Not in place	Other
Q3.8: Age verification for adult content	DE, DK, EE, LT	BE, CZ, ES, FR, IE, IS, IT, NL, PL, RO, SI	AT, BG, EL, HR, HU, LV, MT	CY, FI, LU, NO, PT, SE, SK
Q3.9: Digital identity systems	AT, DE, DK, EE, HR, IS, IT, MT, NL, NO, PL, SE, SI, SK	CZ, FR	BE, BG, CY, EL, FI, HU, IE, LU, LV, PT, RO	ES, LT

Table 8: Actions regarding age verification and digital identity

#### a) National laws, standards or policies regarding age verification

Regarding age verification laws, standards or policies:

- Four countries state that a policy on age verification is in place (DE, DK, EE, LT). Eleven countries indicate this is actively under development (BE, CZ, ES, FR, IE, IS, IT, NL, PO, RO, SI).
- Seven countries state that there is no policy on this topic (AT, BG, EL, HR, HU, LV, MT).
- A further seven countries point to relevant other activities regarding age verification (CY, FI, LU, NO, PT, SE, SK).

Regarding current approaches to age verification, **Germany** provides one of the better-known examples. According to Germany's Interstate Treaty on the Protection of Minors in the Media (Jugendmedienschutz-Staatsvertrag, JMStV), pornographic content on telemedia is prohibited if the provider does not ensure that children and young people cannot access these services. However, age verification systems can be used to prevent this. The Commission for the Protection of Minors in the Media (Kommission für Jugendmedienschutz, KJM) evaluates and reviews age verification systems.





Age verification is also a possible measure to better protect children and young people under Germany's Youth Protection Act. The Federal Agency for Child and Youth Protection in the Media (Bundeszentrale für Kinder- und Jugendmedienschutz, BzKJ) checks whether providers have taken suitable measures in this respect. Similar obligations to restrict access to adult online content apply in **Estonia** and **Lithuania**.

However, it was clear from many of the responses that stronger age verification requirements to restrict minors' access to adult online content are under active consideration in many countries. Some illustrative examples include:

- In **Denmark**, there has been a political agreement to advance strict requirements for effective age verification for access to restricted content and for purchasing restricted goods online.
- In **France**, the draft law Projet de loi de sécurisation de l'espace numérique is currently under consideration. The draft law addresses concrete ways to apply age verification. A system is also being tested.
- In Iceland, the Office of the National Medical Examiner carried out an
  assessment in 2021 of the impact of children's and young people's access to
  pornography on their health and well-being. The government is currently
  considering the implications for policy and regulation.
- In **Ireland**, the regulator Coimisiún na Meán addresses age verification in its draft Online Safety Code. The draft Code proposes that users' self-declaration of age is not an effective measure. It also proposes that platforms that permit pornography and extremely violent content should have to (i) set targets for the effectiveness of age verification, (ii) specify their approach, (iii) measure the effectiveness of the approach, and (iv) be transparent about it.
- In **Italy**, the Privacy Authority and the Communications Authority have set up a joint table to promote a code of conduct that would lead digital platforms to adopt systems for verifying the age of young users accessing online services.
- In the **Netherlands**, a preliminary framework has been developed to help providers of online services choose the right form of age assessment







considering robustness, privacy, safety and accessibility. The framework acknowledges that there is no one-size-fits-all method for age verification. The assessment of the appropriate age assessment method is dependent on the characteristics of an online service or product.

- In **Poland**, the Ministry of Digital Affairs is considering new legislative solutions to ensure the safety of minors on the internet and limit the negative impact of harmful content on their development, based, among other things, on an age verification mechanism. In doing so, it is analysing solutions implemented in other European countries, including British and French regulations.
- In **Spain**, the Spanish Data Protection Agency (AEPD) has issued guidelines on age verification, setting out principles to balance age-gating with data protection and user privacy. However, there are no specific national technical standards. The AEPD encourages the responsible development and implementation of age verification methods, considering factors such as effectiveness, privacy, and transparency.
- Also, in **Spain**, in December 2023, the Spanish National Markets and Competition Commission (CNMC) initiated a public consultation on appropriate age verification systems for audiovisual platforms.

# b) Availability of digital identity systems for minors

Regarding digital identity systems available in EU Member States, Iceland and Norway:

- 14 countries state that there were systems in place for minors (AT, DE, DK, EE, HR, IS, IT, MT, NL, NO, PL, SE, SI, SK).
- Two further countries state that this was in development (CZ, FR).
- Eleven countries report that digital identity systems were not available for minors (BE, BG, CY, EL FI, HU, IE, LU, LV, PT, RO), and two further countries







(ES, LT) refer to other relevant activities not directly related to digital identity systems.

Of the digital identity systems available, it should be noted that, in most cases, such systems are available only to minors aged 14 or older, as the following examples illustrate:

- **Austria**: Persons over the age of 14 can apply for an ID Austria. There is also the digital proof of age and the digital school ID card.
- **Denmark**: Minors can access the Danish digital identity system, MitID, from the age of 13. This allows access to various self-service solutions (for example, online banking or tax information) for minors.
- Estonia: an Estonian citizen under 15 does not have to have an identity card.
- **Germany**: German nationals under 16 receive their national ID card (Personalausweis) with the eID function switched off. Once they are 16, they can choose to have it switched on by the competent authority.
- Iceland: a national electronic ID system is available to individuals under 18.
- **Ireland**: there are currently no government-backed digital identity systems specifically designed for minors. The MyGovID is only available to people over 16 years of age.
- Malta: Malta has implemented an electronic identity (e-ID) system known as the Maltese e-ID card. It is available for minors who are 14 years of age and over.
- **The Netherlands**: In the Dutch digital identity system DigiD, children older than 14 must apply for DigiD themselves. If the child is under 14, the parent or caregiver must assist the child in applying for DigiD.
- **Slovakia**: Currently, digital identification systems are also available for minors in Slovakia. Authentication for minors can be carried out by means of an ID card with an electronic chip (eID) and a personal security code (BOK).







• **Spain**: Spain has implemented electronic ID cards (DNI electrónico) for citizens, allowing electronic authentication and signature. These cards can be obtained at any age, but it is only mandatory for those aged 14 and older.

### 3.1.5 Topic summary: Pillar 1 - safe digital experiences

Pillar 1 of the BIK+ strategy centres on building a safer online environment for children. Overall, the BIK Policy Monitor shows that EU Member States, Iceland and Norway are actively working to create safer online spaces for children. Key findings include:

- Legislative framework: EU laws, including the Digital Services Act (DSA),
  Audiovisual Media Services Directive (AVMSD), and General Data Protection
  Regulation (GDPR), are central to national legislation affecting children's
  online safety. Most countries have either enacted or are actively drafting
  legislation to give effect to these EU laws. Notably, many countries have
  designated Digital Services Coordinators as required by the DSA.
- **Commercial content:** Many countries have codes of conduct for labelling commercial content (for example, influencer marketing) and protecting children's consumer rights. These codes reflect the experience gained from the AVMSD.
- Addressing harmful content: Given that there is no single EU-wide
  definition of 'harmful online content', countries address this issue through
  various laws, procedures, and definitions. Most countries have administrative
  bodies (such as ministries and agencies) that can order the removal of
  harmful content. Most countries also have mechanisms where children can
  report potentially harmful content. However, these mechanisms are often
  geared towards illegal content and may not be child-specific.
- Protecting against online abuse: Most countries have laws to address the non-consensual sharing of intimate images, including a number of dedicated laws to combat this form of online abuse. Almost all countries have laws against cyberbullying, though some lack targeted policies.







Age verification and digital identity systems: Despite EU rules, age
verification mechanisms remain ineffective. Many countries are considering
new policies on this topic requiring more robust solutions. Several countries
provide digital identity systems accessible to minors, starting from age 14.
However, availability is not universal.

# 3.2 Pillar 2 – digital empowerment

Pillar 2 of the BIK+ strategy promotes digital empowerment so that "children acquire the necessary skills and competences to make sound choices and express themselves in the online environment safely and responsibly" (p. 9). Most EU Member States have strategies for developing digital skills, as acknowledged in the BIK+ strategy (p. 12). However, greater support for digital literacy is required for all ages and for different stakeholders, including teachers and parents, as it is for awareness of children's rights in the digital environment and the overall impact of the digital transformation on children's health.

The BIK+ strategy includes a provision to support large-scale media literacy campaigns to support this objective, increasing awareness of risks, including risks faced by children as consumers and related to their personal data. It will promote national Safer Internet Centres as a one-stop shop for reliable information and support (p. 13) in both formal and informal education, and support peer-to-peer learning, co-creation, and youth participation as examples of good educational practice.

This section of the BIK Policy Monitor Report examines relevant activities at the national level, grouped around three key areas of online safety, skills, and digital literacy supports in formal education (3.2.1), informal education (3.2.2), and empowerment of children through specific digital skills such as media literacy and digital civil courage (3.2.3). Countries were asked to respond to eight specific topics, indicating activities that are *in place*, currently *in development*, *not in place*, or *other*, as appropriate.







#### 3.2.1 Supports in formal education

Supporting children in formal education with appropriate digital skills has been an important priority since the original BIK strategy was adopted in 2012. The need for improved media literacy and online safety education for children in schools was a common message heard during consultations with young people in the preparation of the updated BIK+ strategy.

An overview of three key actions of teaching online safety, online safety policies in schools, and ensuring adequate teacher training is given in Figure 25 below.

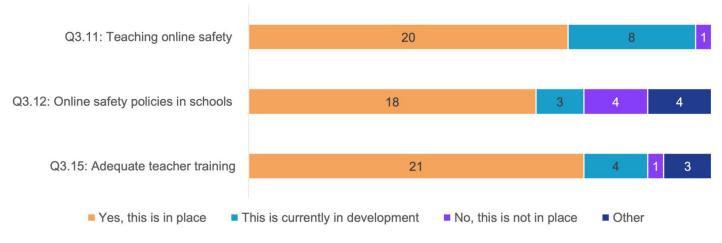


Figure 25: Actions on formal education







	In place	In development	Not in place	Other
Q3.11: Teaching online safety	AT, BG, CY, DE, EE, FI, FR, HU, IE, IT, LT, LU, MT, NO, PL, PT, RO, SE, SI, SK	BE, CZ, DK, EL, ES, HR, IS, NL	LV	_
Q3.12: Online safety policies in schools	AT, BE, CY, DE, DK, EE, EL, ES, FI, FR, HR, HU, IE, IT, MT, NL, NO, PT	IS, LT, SK	BG, LV, RO, SI	CZ, LU, PL, SE
Q3.15: Adequate teacher training	AT, BE, BG, CY, CZ, DE, EE, EL, ES, FI, HR, HU, IT, LV, MT, NO, PL, PT, SE, SI, SK	DK, FR, IE, RO	IS	LT, LU, NL

Table 9: Actions on formal education

As Figure 25 shows, high levels of activity are reported in all countries, reflecting the observation in the BIK+ strategy that most countries have strategies in place for developing digital skills. The following brief overview of different national approaches summarises what form this takes, and the different priorities served.

# a) Teaching online safety

Country respondents were first asked if teaching online safety has been incorporated into the national/regional school curriculum and to provide details of relevant recent developments:

- 20 countries report that online safety is part of the national curriculum (AT, BG, CY, DE, EE, FI, FR, HU, IE, IT, LT, LU, MT, NO, PL, PT, RO, SE, SI, SK).
- A further eight countries report activities currently in development regarding online safety education in schools (BE, CZ, DK, EL, ES, HR, IS, NL).







• Just one country (LV) reported that online safety was not currently a formal part of the curriculum, although the national Safer Internet Centre plays an important role in online safety training.

From the various responses received from countries, it is clear that online safety and digital skills are well embedded in most formal education settings. Many countries refer to the Digital Competence Framework for Citizens (DigComp) as the reference framework for formulating learning outcomes in national curricula. The number of countries that referred to a recent renewal of curricula for online safety and digital literacy skills was also noteworthy, as the following selected examples illustrate:

- In **Croatia**, in 2019, a cross-curricular topic on the Use of Information and Communication Technology was introduced into the curriculum for primary and secondary schools.
- In **Cyprus**, the topic of 'New Technologies', which includes computational thinking, digital skills, and digital literacy, has recently been added to strengthen the horizontal integration of digital technologies across all subjects of the curriculum, again drawing on DigComp as a reference framework.
- In Hungary, in 2020, a new subject called Digital Culture was introduced in the National Core Curriculum, replacing the previously titled subject of Informatics. This subject is compulsory from 3rd to 11th grade and aims to enhance learners' digital citizenship skills.
- In **Luxembourg**, a new Digital Sciences course was introduced during the 2020-2021 school year and rolled out to 7<sup>th</sup>-grade classes nationwide. The programme, aimed at lower secondary schools, covers both technical and human aspects of digitalisation and uses the Medienkompass as its frame of reference. Both the outputs and the learning processes are evaluated using a system of eduPASS badges to attest to the innovative acquisition of skills.
- In the **Slovak Republic**, a new national curriculum for primary school was introduced in 2023. Key cross-cutting literacies include digital literacy and







civic literacy among others. Learning outcomes include the ability to distinguish between trustworthy sources of information and to behave safely in an online environment.

A noteworthy feature of recent curriculum developments in **Ireland, Lithuania** and **Portugal** is the inclusion of digital citizenship skills. These recent reforms of national curricula have seen the introduction of life skills using digital technologies in cross-curricula subjects such as Social, Personal and Health Education (SPHE).

In **Portugal**, the National Strategy for Education for Citizenship encompasses a set of domains addressing themes of digital citizenship, including human rights (hate speech including cyberbullying), media (media literacy and education), health (online dependencies, all forms of violence including bullying), sexuality (online risky behaviours such as sexting, sextortion, and grooming), and security, defence, and peace (cybersecurity).

#### b) Online safety policies in schools

Country respondents were also asked if there were national/regional strategies to support online safety policies in schools (for example, policies on expected behaviour, use of smartphones, how to deal with cyberbullying incidents, and so on):

- 18 countries report having strategies in place to support online safety policies in schools (AT, BE, CY, DE, DK, EE, EL, ES, FI, FR, HR, HU, IE, IT, MT, NL, NO, PT).
- Three further countries (IS, LT, SK) say that initiatives are in development in this area.
- Four countries state that such policies are not available (BG, LV, RO, SI).
- A further four countries (CZ, LU, PL, SE) indicate that there were more general national policies which applied to schools, for instance, dealing with safe and secure access or reporting of cyber-related incidents but which were not specific to individual schools (survey response other).







Policies to support safe, healthy and positive learning environments – frequently mandated in national laws – are a noteworthy feature of schools' digital policies in many countries. The implementation of specific policies to address bullying incidents is a particular feature of such policies:

- In **France**, as part of its national anti-bullying strategy, mandatory lessons are required for all students from the 3rd class to the high school.
- In **Estonia**, in 2021, the Ministry of Education and Sciences introduced a new long-term strategic partnership system which includes preventing and reducing bullying (including cyberbullying) and effectively supporting mental health in all schools.
- In Luxembourg, a national policy for well-being in schools has been developed and will be implemented in all high schools by 2025. The policy aims to ensure that each student has the opportunity to thrive at school in complete safety and reach their full potential, while feeling supported, respected and valued.
- Malta has been actively addressing bullying in schools through a
  comprehensive national strategy. A key aspect of its approach was the
  implementation of clear and robust anti-bullying policies, designed to not only
  prevent instances of bullying but also to respond to and address any incidents
  that occurred. Policies typically contain definitions of bullying behaviour,
  procedures for reporting incidents, and consequences for perpetrators.
- In Sweden, schools and school staff have the responsibility to prevent and to
  investigate all forms of harassment or offensive behaviour and, where
  necessary, report them to the police. According to the Swedish National
  Agency for Education, this responsibility includes social media or other digital
  communication.

Guidance on screen time and the use of digital devices, including smartphones in schools, was also a notable feature of some recent policy developments.







- For example, in February 2024, **Denmark's** National Agency for Education and Quality provided recommendations for using screens in primary schools. The initiative is designed to ensure positive online environments in primary schools and the appropriate use of screens (computers, mobile devices, and interactive boards), contributing to high-quality teaching and student learning. How schools handle the use of mobile phones, computers, and other screens is a local decision.
- In Ireland, in November 2023, the Department of Education launched a
  policy called Keeping Childhood Smartphone Free. This policy provides a
  guide for parents and parents' associations who wish to engage with their
  school community regarding internet safety and access to smartphones for
  primary school children.

#### c) Adequate teacher training

Finally, regarding the topic of formal education supports, countries were asked if there were activities to ensure adequate teacher training (pre-service or in-service) regarding online safety:

- 21 countries report that adequate support is in place for teacher training on this topic (AT, BE, BG, CY, CZ, DE, EE, EL, ES, FI, HR, HU, IT, LV, MT, NO, PL, PT, SE, SI, SK), while four countries indicated that related initiatives are currently in development (DK, FR, IE, RO).
- Only one country (IS) report that was not in place.
- A further three countries (LT, LU, NL) point to resources or supports for teachers, such as those produced by Safer Internet Centres, but which do not qualify as teacher training (survey response other).

Most countries prioritise supporting and improving teachers' digital literacy skills and include them in the core curriculum for teacher training. In many instances,





this is supplemented by specialist training on online safety topics, often with the support of the SIC.

- In **Austria**, Digital Basic Education is included as part of teacher training. A new mandatory module on media education is being developed as part of the 8 Point Plan for the Digital School.
- In Finland, between 2020 and 2023 the Ministry of Education and Culture developed the Uudet lukutaidot (New Literacies) programme to develop teachers' digital competencies. Competence descriptions for media literacy, digital competences, and programming skills to enhance the quality and equality of teaching are included.
- In Slovenia, under its digitalisation in education strategy, national training workshops were made available to all teachers under an initiative called Enhancing Digital Competence. A MOOC (massive open online course) dedicated to online safety was also developed, which delivered training to over 15,000 teachers.
- Hungary's Public Education Strategy 2021 2030 (Köznevelési stratégia 2021 - 2030) highlights the development of teachers' digital competence as a priority and recommends more intensive and targeted training of teachers at all education levels.
- In Italy, the Ministry of Education introduced rules to mandate in-service training on digital education from the 2023-24 school year and a new integrated platform, Futura, to deliver online training to school staff on topics related to digital teaching and the digital transformation of schools.

#### 3.2.2 Informal education

The BIK+ strategy also aims to complement digital education in informal settings, promoting resources available to the general public through the Better Internet for Kids (BIK) portal and encouraging the outreach work of Safer Internet Centres so that children can learn in a variety of settings. The BIK Policy Monitor examines







actions to support informal education at the national level, and facilitate peer-topeer learning by promoting and supporting various practices in which young people are at the forefront of collaborative learning.

A summary of responses from countries is given in Figure 26 below, followed by a brief account of national forms of implementation.

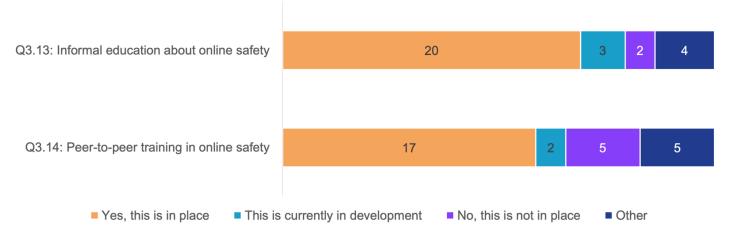


Figure 26: Actions on informal education

	In place	In development	Not in place	Other
Q3.13: Informal education about online safety	AT, BE, BG, CY, CZ, DE, EE, EL, ES, FI, HR, HU, IT, LU, MT, NO, PT, RO, SE, SI	IS, FR, SK	DK, LV	IE, LT, NL, PL
Q3.14: Peer-to-peer training in online safety	AT, BE, BG, CY, DE, EE, EL, ES, FI, HU, IE, IS, IT, PT, RO, SI, SK	DK, MT	CZ, FR, HR, LV, SE	LT, LU, NL, NO, PL

Table 10: Actions on informal education







#### a) Informal education about online safety

Regarding informal education activities, countries were asked about activities to reinforce lifelong learning or other opportunities outside the formal education system about online safety and digital skills. According to responses, this is also an aspect of digital empowerment that receives wide support among EU Member States, Iceland and Norway:

- 20 countries say they have activities in place for lifelong learning on online safety and digital skills (AT, BE, BG, CY, CZ, DE, EE, EL, ES, FI, HR, HU, IT, LU, MT, NP, PT, RO, SE, SI).
- Three countries (IS, FR, SK) report that programmes are currently in development on this topic, and four more countries (IE, LT, NL, PL) report relevant other activities.
- Two countries (DK, LV) say that this is not in place.

Among selected country responses, the following are illustrative examples of some of the lifelong learning opportunities referred to:

- Austria has a Digital Skills for All project as part of its Digital Skills Initiative.
   Free workshops on safe internet use have been offered nationwide, since
   October 2023, with the aim of reaching all target groups who do not attend formal learning venues.
- The Czech Digital Skills and Jobs Coalition (Digikoalice) hosts an online catalogue that provides children with many educational activities. Currently, there are more than 140 activities/courses created by different entities and organisations that are easily accessible to children and their parents/teachers.
- **Finland's** national development programme for Youth Work and Youth Policy 2020-2023 includes topics of youth empowerment and participation as well as preventing bullying and grooming. The Media Literacy in Finland policy also aims to promote media literacy nationally and includes informal education.





- In **Germany**, the media guide SCHAU HIN! supports parents and guardians with age-appropriate, up-to-date recommendations for children's media use that are suitable for everyday use. This guide provides information about information and entertainment options, and the risks of media use. Parents and guardians can attend media courses to learn how to deal with digital media and support children and young people.
- In Hungary, a network of Magic Valley Media Literacy Education Centres was established by the National Media and Infocommunications Authority (NMHH) to help children understand how media works and how content is created, to foster their media literacy skills and competence, and to instil in children a critical attitude in media consumption. Magic Valley's ultimate goal is to raise children's awareness, in a playful manner, of how they are affected by the internet by offering interactive, creative activities.
- **Ireland** has a multi-stakeholder initiative called Media Literacy Ireland (MLI), under the regulator Coimisiún na Meán. MLI offers an ongoing public awareness campaign called Be Media Smart, which particularly focuses on the risks of disinformation online.
- In Sweden, UR, the Swedish Educational Broadcasting Company, is part of
  the public service broadcasting group. UR's mandate is to produce and
  broadcast educational and general knowledge programmes that strengthen,
  broaden, and complement the work of others active in education.
  Programmes focusing on online safety are produced, but there is no policy
  directly addressing the topic.

The role of Safer Internet Centres is especially prominent in promoting and supporting informal education opportunities:

 In Luxembourg, the Safer Internet Centre, BEE SECURE, offers non-formal education activities for out-of-school groups of children and young people, and publishes a range of guides, thematic contributions, pedagogical resources and online tools.







- Malta's SIC provides training sessions to leaders engaged in non-formal
  educational activities, including Girl Guides, Scouts, and sports organisations.
  A comprehensive toolkit has been developed to equip leaders with the
  necessary resources and guidance to effectively engage with the children
  under their supervision in matters pertaining to online safety.
- Norway's Safer Internet Centre (NSIC) has a project called Senior School
  which focuses on increasing senior citizens' critical media thinking and
  knowledge about source criticism and fake news.

#### b) Peer-to-peer training and support programmes

Promoting peer learning is also highlighted in the BIK+ strategy as an important aspect of digital skills development. In this context, countries were asked if there were national/regional activities in place to develop and promote peer-to-peer training and support programmes in online safety:

- 17 countries report that they have activities in place to promote peer learning for online safety and digital skills (AT, BE, BG, CY, DE, EE, EL, ES, FI, HU, IE, IS, IT, PT, RO, SI, SK).
- Two countries (DK, MT) report that new programmes were in development on this topic, while five countries pointed to other relevant activities (LT, LU, NL, NO, PL).
- Five countries state that this was not available (CZ, FR, HR, LV, SE).

Peer learning plays an important role in awareness-raising, digital literacy and handling sensitive topics, as some of the following examples show:

Belgium's Child Focus launched the CYBERSQUAD initiative, which uses a
peer-to-peer approach to help young people share information and seek help
on challenges they face online.





- In **Finland**, the Mannerheim League for Child Welfare has a peer student support programme with around 11,000 students reaching almost all schools. The peer learning programme includes online safety issues.
- In **Germany**, JUUUPORT is a nationwide peer-to-peer-based online counselling service for young people, specifically for internet-based problems such as cyberbullying. Volunteer teenagers and young adults, the JUUUPORT scouts, advise their peers on online problems.
- Hungary's NETMENTOR Peer Mentoring Programme develops children's
  digital awareness through peer learning. In the programme, high school
  students are trained and go back to their schools (or primary schools) to give
  lessons about digital media use, data privacy, cyberbullying, and so on. They
  also mentor younger kids.
- In Romania, Save the Children has created a broad network of young individuals trained in online safety who have become ambassadors for the Ora de net programme. They actively help and organise activities among peers in schools, creating a supportive community that focuses on encouraging responsible and secure online behaviour among adolescents.
- In **Spain**, a range of regional peer learning programmes exist, such as the ADA Program (Andalusian Digital Student Helpers), from the Autonomous Community of Andalusia, aimed at raising awareness and providing training to the educational community in preventing bullying and cyberbullying in educational environments. Correspondingly, ICT Helpers in the Autonomous Community of the Canary Islands and Students Helping with ICT Activity in the Autonomous Community of Extremadura also exist.





### 3.2.3 Empowering through digital skills

Developing and enhancing children's digital literacy skills is central to Pillar 2 - digital empowerment. This envisages all children having access to the "necessary skills and competences to make sound choices and express themselves in the online environment safely and responsibly" (BIK+ strategy, p. 9). The BIK Policy Monitor asks about three aspects of digital literacy skills as follows:

- Skills for online communication and collaboration.
- Media literacy skills.
- Skills to develop digital civil courage.

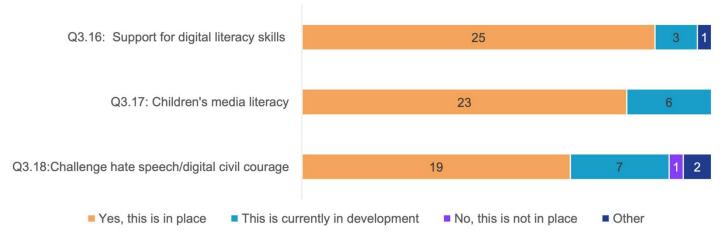


Figure 27: Actions to promote digital skills





	In place	In development	Not in place	Other
Q3.16: Support for digital literacy skills	AT, BE, BG, CY, CZ, DE, EE, EL, ES, FI, FR, HR, HU, IS, IT, LT, MT, NL, NO, PL, PT, RO, SE, SI, SK	DK, IE, LV	_	LU
Q3.17: Children's media literacy	AT, BE, BG, CY, EE, EL, ES, FI, FR, HU, IE, IS, IT, LT, LU, MT, NL, NO, PL, RO, SE, SI, SK		_	_
Q3.18: Challenge hate speech/digital civil courage	AT, BE, BG, DE, DK, EE, EL, ES, FI, FR, IT, LU, MT, PL PT, RO, SE, SI, SK	CY, CZ, HR, IE, IS, LV, NO	NL	HU, LT

Table 11: Actions to promote digital skills

As shown in Figure 27 above, activities to develop digital skills are prominent in nearly all countries and are among the top activities within Pillar 2, which are represented as actively in place in national responses:

- Supporting young people's digital literacy skills for online communication and collaboration (for example, interacting, sharing, engaging, collaborating through digital technologies, managing e-presence and digital identity) is present in some form in all countries.
- Activities to foster children's media literacy, including how to analyse, compare, and critically evaluate the credibility and reliability of data sources, information and digital content, are likewise present in all countries. Six





- countries (CZ, DE, DK, HR, LV, PT) report new activities in development on this topic.
- Activities that encourage bystanders to challenge online hate speech and to develop digital civil courage (for example, speaking up against a victim's bullies, perpetrators, or harassers) are also reported to be in place or in development in all but one of the countries.

#### a) Digital literacy skills

Digital literacy activities encompass a wide range of programmes and initiatives covering all aspects of young people's participation and communication online.

According to responses, this aspect of digital empowerment receives wide support among EU Member States, Iceland and Norway:

- 25 countries say they have activities in place for supporting the development of digital literacy skills (AT, BE, BG, CY, CZ, DE, EE, EL, ES, FI, FR, HR, HU, IS, IT, LT, MT, NL, NO, PL, PT, RO, SE, SI, SK).
- Three countries (DK, IE, LV) report that programmes are currently in development on this topic.
- One country (LU) reported that no information was available on this topic (survey response other).

Drawing on digital competence frameworks such as DigComp, activities to foster digital skills typically have a central role in schools' digital transformation programmes. Alongside skills enhancement, some additional distinctive elements include:

 In Austria, the Click & Check programme promotes responsible use of digital media with particular attention to preventive legal information, particularly regarding youth protection regulations. Young people are confronted with various legal regulations in their various living environments.





- **Croatia's** Safer Internet Centre has launched a school of responsible influencers. The aim is to raise influencers' and content creators' awareness of the importance of responsible behaviour in the online world, raise awareness about recognising and reporting inappropriate content on the internet and how to report it, and recognise the importance of creating positive online content and positive influence.
- In Malta, digital literacy is integrated across various educational levels. This
  includes equipping students with the skills to effectively use digital tools and
  technologies, understanding digital citizenship, and promoting critical thinking
  in the digital realm. Digital literacy efforts in Malta aim to empower
  individuals to navigate the digital landscape safely, responsibly, and
  confidently.
- In **Norway**, digital skills are one of five fundamental skills in the national curriculum. These include using and understanding digital resources, being creative, and using digital resources for communication and interaction.
- In **Romania**, a cross-curricular approach exists for digital skills for all levels of education (primary, secondary, and upper-secondary levels), including internet security and cybersecurity awareness.
- In **Slovenia**, new projects have been initiated within the National Recovery and Resilience Plan (NRRP) and the European Social Fund to enhance key and other competencies through interdisciplinary collaboration and the active role of learners. The active role primarily involves participation in the planning, implementation, and reflection of such lessons, with a focus on collaboration and communication, especially on digital platforms.
- In Sweden, as of 2018, digital competence was integrated into the national curricula for all school forms, including the pre-school curriculum. There is also a thematic eCitizens Week focussing on different aspects of digital literacy for all age groups.





#### b) Media literacy

The BIK+ strategy also highlights the need for media literacy skills to counter disinformation and enable children to understand and navigate the information they access online (p. 13). National responses also extensively address this aspect:

- 23 countries say they have focused activities in place fostering children's media literacy (AT, BE, BG, CY, EE, EL, ES, FI, FR, HU, IE, IS, IT, LT, LU, MT, NL, NO, PL, RO, SE, SI, SK).
- Six countries (CZ, DE, DK, HR, LV, PT) report that programmes are currently in development on this topic.

Examples of relevant initiatives at the national level are:

- In Bulgaria, media literacy is a part of the school curriculum and is integrated into different educational forms such as civic education, practical classes and project-based activities.
- In Croatia, the BrAIn project supports extracurricular activities in which students critically reflect on digital technologies and artificial intelligence. Students work directly with innovative technologies, for example, programming and making chatbots, engaging in activities that deepen their understanding of how technologies and artificial intelligence work. They also create different authentic products, such as presentations and artwork, while taking into account cyber security.
- In **Cyprus**, there are national and regional activities aimed at fostering children's media literacy, including teaching them how to analyse, compare, and critically evaluate the credibility and reliability of sources of data, information, and digital content. These initiatives recognise the importance of equipping children with the skills to navigate the vast amount of information available to them, especially online.
- In **Denmark**, the Danish Media Council contributes the "Stop. Think. Checkit" campaign, focused on misinformation, disinformation and malinformation and







- comprising short videos, podcasts and teaching material for young people from 14 to 29 years.
- In **Estonia**, Media Literacy Week is held annually under the Ministry of Education and Research coordination, and various institutions organise educational and informational events to promote digital literacy.
- In Finland, various activities and campaigns are held annually such as Media Literacy Week (which includes Safer Internet Day), National Games Week, News Week, and Media Literacy School (a hub for media educational resources), with approximately 60 municipal New Literacies development projects currently going on, funded by the government.
- In **France**, media literacy and critical analysis of the information system form part of the school curriculum via a domain called Education aux médias et à l'information (EMI).
- In **Iceland**, media literacy and countering disinformation is a distinctive part of the mandate of the Icelandic Media Commission. The campaign is called *Stoppa, hugsa, athuga* (Stop, think, check), and is a collaboration between the Icelandic Media Commission, Embætti landlæknis (the Directorate of Health in Iceland) and Vísindavefurinn (the University of Iceland's Web of Science), with support from Facebook.
- In Malta, a notable initiative is the Media Literacy in Malta project, which
  aims to enhance media literacy skills among educators, parents, and children.
  This project includes workshops, seminars, and resources designed to teach
  children how to analyse, compare, and critically evaluate the credibility and
  reliability of data sources, information, and digital content.
- In Norway, "Think" (Tenk) is the education department of Faktisk.no, an independent newsroom for fact-checking social debate and public discourse.
   It is a collaboration between six of the country's largest and competing media houses as a response to the spread of disinformation and fake news in the public debate.





- In the Slovak Republic, the Council for Media Services has initiated a Media Literacy+ Platform. This platform provides space for the exchange of best practices in media literacy and is aimed at a general audience, including young people.
- In **Sweden**, media literacy is included in the curriculum for all levels of education and coordinated by the Swedish Agency for the Media. The agency runs a network with multiple actors from the public and civic sectors engaged in MIL formal and informal education and awareness activities. The agency hosts an online resource bank where members of the network can share resources, such as media and learning material.

#### c) Digital civil courage

Digital empowerment also means empowering users to challenge online hate speech and to develop what is often referred to as digital civil courage by speaking up against a victim's bullies, perpetrators, or harassers. Two-thirds of the countries surveyed include this in their national bullying prevention programmes:

- 19 countries say that they have activities in place to challenge hate speech or foster digital civil courage (AT, BE, BG, DE, DK, EE, EL, ES, FI, FR, IT, LU, MT, PL PT, RO, SE, SI, SK).
- Seven countries indicate that initiatives are currently in development on this topic (CY, CZ, HR, IE, IS, LV, NO).
- One country (NL) reports that no such activities are in place, while a further two (HU, LT) indicated that there was no information available on this topic (survey response other).

#### Some relevant examples include:

• **Finland's** Well Said project is a five-year initiative led by Yle and the Timeout Foundation. The purpose of the project is to strengthen the best aspects of Finnish conversational culture and create safe environments that foster







- discussion and conversations. The Ministry of Interior also hosted a campaign Don't spread hate when you communicate! in 2020.
- In Germany, the BMFSFJ has funded the Competence Network on Hate on the Internet. The network advises victims of hate speech, strengthens civil society networks, and develops media-didactic concepts and formats. In addition, the accompanying project Bundesarbeitsgemeinschaft (BAG) gegen Hass im Netz (Federal Working Group against Hate on the Net) was established in August 2021 to forge a stronger link between civil society engagement and research, thus ensuring an evidence-based foundation for work against digital hate.
- In **Luxembourg**, the national Safer Internet Centre, BEE SECURE, launched a campaign, NOHATEONLINE, promoting 'civil courage' in regard to hate online. This included an interactive online tool to foster awareness.
- In **Poland**, the Empowering Children Foundation runs the IMPACT programme (Interdisciplinary Model for Preventing Aggression and Technological Cyberbullying), an innovative programme for schools aimed at preventing cyberbullying among youth aged 13 to 16.
- In **Portugal**, The 'School Without Bullying. School Without Violence' initiative equips educational communities with a series of tools to help prevent and combat the phenomena of bullying and cyberbullying, especially among the younger population. The initiative provides a support tool aiming to use different approaches to prevention and intervention in this phenomenon to encourage, recognise, and disseminate reference practices.
- In **Slovenia**, in 2023, the Strategic Council for Preventing Hate Speech was established. The Council monitors and proposes activities to prevent hate speech, evaluates ministries' performance, advises on policies and regulatory changes, coordinates working groups, and assesses the effectiveness of relevant authorities. Additionally, it provides expert support to the national coordinator for prosecuting hate speech.





#### 3.2.4 Topic summary: Pillar 2 - digital empowerment

The BIK+ strategy emphasises the importance of digital empowerment for children's safe and responsible online participation. EU Member States, Iceland and Norway report the implementation of a wide range of actions focused on digital skills development within formal education, informal learning settings, and programmes that build digital resilience.

- **Digital skills in formal education:** 25 out of 29 countries have well-established strategies for integrating online safety and digital skills training into national curricula. Three countries refer to new activities in development in this area. The Digital Competence Framework for Citizens (DigComp) is widely referred to. Recently updated curricula include a greater focus on digital citizenship, critical thinking, and addressing issues like bullying and cyberbullying. 21 out of 29 countries provide teachers with pre-service or inservice training on online safety and digital literacy skills.
- Informal learning opportunities: There is strong support for lifelong learning and informal education initiatives on online safety and digital skills.

  19 out of 29 countries have or are developing activities that promote peer-to-peer learning and support programmes to address online safety issues.

  Examples such as Belgium's CYBERSQUAD, or Germany's SCHAU HIN! project seek to support young people to help each other navigate online challenges.
- Comprehensive digital literacy: Nearly all countries actively promote digital literacy skills in various domains. These include actions to equip children to interact and collaborate effectively in digital spaces. Media Literacy initiatives are also widely represented and foster critical evaluation of online information and counter disinformation. The topic of digital civil courage is also well represented, in which children are encouraged to intervene against online hate speech and cyberbullying.





# 3.3 Pillar 3 - active participation, respecting children

Pillar 3 of the BIK+ strategy deals with active participation and respecting children by giving them a say in the digital environment and including more child-led activities to foster innovative and creative safe digital experiences (BIK+ strategy, p. 9). As the strategy notes, children risk being under-represented in policy-making decision processes. Therefore, it is important to "actively involve children in all their diversity in shaping the digital environment" (p. 16). Children should be supported in developing and practising citizenship skills and enjoy the right to participate via online social platforms. At the same time, EU Member States should provide appropriate opportunities and resources to facilitate their participation.

In the BIK Policy Monitor, country respondents were asked to describe and provide evidence for various activities relevant to Pillar 3. These are grouped under three main headings: 3.3.1 Active participation (investigating actions to promote participation and youth civic engagement), 3.3.2 Inclusivity (looking at actions to foster inclusivity, address digital divides, and provide child-friendly access), and 3.3.3 Digital creativity (inquiring actions to promote creativity and better availability of positive digital content).

The main findings and a brief explanation of activities underway in Member States, Iceland and Norway are summarised below.

#### 3.3.1 Active participation

This section of the BIK Policy Monitor includes three items in which country respondents were asked to describe national activities in place to support active participation, whether this is mandated in law, and – reflecting that participation forms a central aspect of children's rights – activities to promote awareness of children's rights regarding the digital environment.

A summary of findings is given in Figure 28 below, followed by a brief account of country provision.





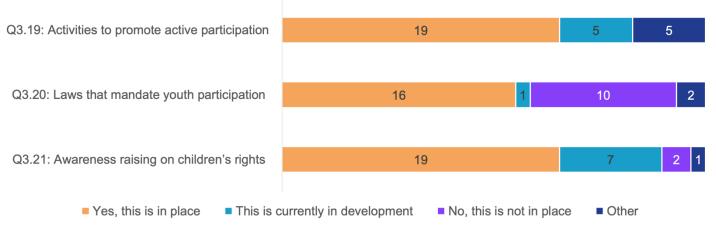


Figure 28: Actions to promote active participation

	In place	In development	Not in place	Other
Q3.19: Activities to promote active participation	AT, BE, BG, DE, EE, EL, ES, FI, IE, IT, LT, MT, NL, NO, PL, PT, RO, SI, SK	CY, CZ, HR, IS, LV	_	DK, FR, HU, LU, SE
Q3.20: Laws that mandate youth participation	AT, BG, DE, DK, EE, ES, FI, HU, IE, IS, IT, LU, NO, PT, SI, SK	HR	BE, CY, CZ, EL, FR, LT, LV, MT, NL, PL	RO, SE
Q3.21: Awareness raising on children's rights	AT, BG, DE, DK, EE, EL, ES, FI, HR, HU, IT, LT, LU, MT, NO, PT, SE, SI, SK	BE, CY, IE, IS, LV, NL, PL	CZ, FR	RO

Table 12: Actions to promote active participation







As Figure 28 shows, actions to promote active participation are well-represented in most countries, though there is variation in how this is achieved and the extent to which it is supported by official government policy or mandated by national law.

All countries report some relevant national/regional activities that promote active participation, youth civic engagement, and advocacy in the digital environment.

- 19 countries state that there are activities or programmes in place for this purpose (AT, BE, BG, DE, EE, EL, ES, FI, IE, IT, LT, MT, NL, NO, PL, PT, RO, SI, SK). Five countries (DK, FR, HU, LU, SE) indicate other relevant support activities; in a further five countries, new activities are said to be in development (CY, CZ, HR, IS, LV).
- In 16 countries, national laws, regulations, or policies mandate youth participation in decision-making bodies (AT, BG, DE, DK, EE, ES, FI, HU, IE, IS, IT, LU, NO, PT, SI, SK), while such laws are in development in one further country (HR). However, no such law or regulation exists in ten countries (BE, CY, CZ, EL, FR, LT, LV, MT, NL, PL), and two further countries report measures that do not explicitly mandate youth participation (RO, SE; survey response other).
- 19 countries have actions in place to promote better awareness of children's rights in relation to the digital environment (AT, BG, DE, DK, EE, EL, ES, FI, HR, HU, IT, LT, LU, MT, NO, PT, SE, SI, SK), and seven more countries have actions or programmes currently in development on this topic (BE, CY, IE, IS, LB, NL, PL). Two countries, in turn, report to have no actions or programmes in place (CZ, FR), while one other (RO) refers to initiatives that only indirectly raise awareness about children's rights (survey response other).

## a) Active participation

Measures to promote active participation and civic engagement take various forms at the national level and come under different aspects of national policies related to youth development, education and SIC-related support activities. In many of the





instances cited in individual country responses, government agencies provide dedicated platforms for this purpose:

- In **Austria**, the Federal Youth Council acts as a legally anchored representation of the interests of all children and young people. Its tasks are regulated by the Federal Youth Representation Act, the implementation of which is the responsibility of the Federal Chancellery. Young people can also actively participate in European youth policy through the EU Youth Dialogue.
- In **Bulgaria**, regional initiatives under the national *Non-violent educational* environment promote a range of participation activities. Civic education is also part of the school curriculum and includes practical classes and project-based activities.
- In Croatia, the Ombudsman for Children is a key agency promoting active
  participation and advocating on behalf of children for their views to be heard.
  Its work is supported by a network of young advisers (NYA), which act as an
  advisory and cooperation body that brings together children and young
  people from all over Croatia.
- In **Finland**, the Centre of Expertise for Participation, which is partly funded by the government, promotes overall participation and youth engagement at the national level, while national media education policy promotes active participation, including BIK+ principles.
- In Germany, at the national level, the advisory board at the Federal Agency for Child and Youth Protection in the Media is the first higher federal authority to implement child and youth participation in its advisory board in accordance with the Youth Protection Act.
- Ireland has established a National Framework for Children and Young People's Participation in Decision-making and a national centre of excellence and coordination in children and young people's participation in decision-making.
- Malta's Office of the Commissioner for Children convenes a youth panel comprising a diverse group that discusses various aspects of online safety,







including cyberbullying, privacy protection, data security, online harassment, and responsible internet usage. The youth panel serves as a conduit for feedback and suggestions to policymakers, educators, and technology companies regarding online safety initiatives and regulations. By actively engaging with stakeholders, panel members advocate for measures that promote a safer online environment for everyone, particularly young people.

- The **Netherlands'** Youth Council on Digitalisation was established jointly between the Ministry of the Interior and Kingdom Relation and UNICEF to ensure children's voices were heard, and to develop recommendations on legislation and regulations to protect children against all kinds of online risks such as harmful information, bullying, discrimination and fake news.
- In **Spain**, the Youth Institute (Injuve) focuses on promoting youth engagement. The Injuve Youth Portal often provides information on youth opportunities, including events, campaigns, and initiatives related to civic participation and digital engagement. Additionally, the Consejo de la Juventud de España (CJE) plays a role in representing and promoting the interests of young people in Spain and often engages in initiatives related to youth participation, advocacy, and digital engagement.

Safer Internet Centres again lead the way in providing opportunities for young people to contribute to digital policy deliberations, and in many countries, they are the sole forum for this topic.

## b) Mandating youth participation and promoting children's rights

Mandating youth participation is present in just over half of all participating countries. Examples include:

 In Bulgaria, a regulation under the Chairperson of the State Agency for Child Protection stipulates the creation of the National Children's Council, which ensures youth participation in decision-making bodies at national and regional level, including the National Child's Assembly.







- In **Finland**, consultation with and participation of children and young people is regulated by legislation that applies to them (e.g. the Youth Act, Child Protection Act, Basic Education Act, Early Childhood Education Act). In addition, the Municipalities Act obliges municipalities to set up a youth council and ensure that it operates properly.
- In **Iceland,** the National Youth Act no. 70/2007 states that local governments should actively pursue the foundation of local youth councils occupied by young people. These local youth councils do not have the capacity to affect national youth policy directly. Still, they can, through cooperation, usually in the form of meetings and conferences with local authorities and/or between themselves, impact local youth policies and influence the dialogue nationally.
- In **Norway**, the Norwegian Constitution and The UN Convention on the Rights of the Child (incorporated into Norwegian law through the Human Rights Act) establish children's right to be heard in all matters that concern them. This also applies on a systemic level.
- In the **Slovak Republic**, young people are mandated to participate in public debate and decision-making processes, mostly via school and local/regional parliaments. These were established by law No. 488/2021. According to this legislation, a school may establish a school parliament that advises the director on matters related to students at the student's request.

Alongside measures to facilitate children's participation in digital policy debates and public participation, awareness raising regarding children's rights in the digital environment is an important component of creating a culture where children have a voice in shaping the digital world. Activities in this area are reported to be present in most countries. In some instances, these are topic-specific, such as calling attention to children's rights in the context of sharenting (UNICEF Austria), privacy and protecting personal data, and in the context of a good educational environment. Some dedicated initiatives exist for this purpose, such as **Finland's** Center of Expertise for Participation, **Ireland's** Hub naNÓg, or **Hungary's** Hintalovon Child Rights Foundation.







In **Germany**, the initiative Growing up well with Media (Gutes Aufwachsen mit Medien, GAmM) brings together various projects to raise awareness in this area. In **Iceland**, the Children's Ombudsman's office has launched new guidelines about the internet and social media. Similarly, the **Slovak Republic's** Digital Intelligence initiative raises awareness about children's rights.

#### 3.3.2 Inclusivity

Ensuring all children have equal, effective, safe and inclusive access to the digital environment is a cornerstone of the BIK+ strategy (p. 8). According to research cited in the strategy, around 20 per cent of children in the EU live in families experiencing digital deprivation. EU Member States are invited to make the necessary investment to tackle all forms of digital divide, in line with the European Child Guarantee.

In the BIK Policy Monitor, country respondents were asked about the availability of measures to ensure the inclusiveness of children's active participation and addressing any divides in relation to age, gender, urban/rural location, and inclusion of seldom-heard and hard-to-reach or otherwise marginalised children and youth populations. A follow-up item asked if a government system is in place to publish child-friendly versions of policy documents or policy initiatives relevant to BIK+ topics.

Figure 29 below summarises the main findings, followed by a brief outline of different countries' approaches.







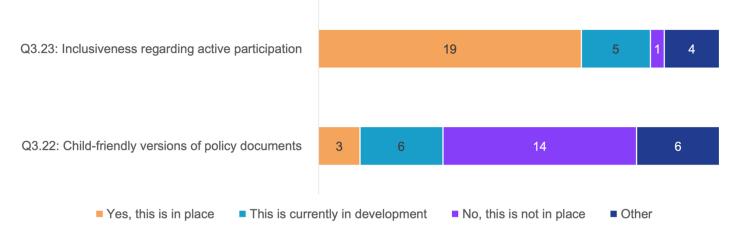


Figure 29: Actions to promote inclusivity

	In place	In development	Not in place	Other
Q3.23: Inclusiveness regarding active participation	AT, BE, BG, CZ, DE, DK, EE, EL, ES, FI, HR, HU, IE, IT, LT, LV, MT, PT, SE	CY, IS, NO, PL, SI	RO	FR, LU, NL, SK
Q3.22: Child-friendly versions of policy documents	ES, MT, PT	BG, IE, IT, NL, NO, SI	CZ, DK, EE, EL, FI, FR, HR, IS, LT, LV, PL, RO, SE, SK	AT, BE, CY, DE, HU, LU

Table 13: Actions to promote inclusivity

#### a) Actions to promote inclusivity

All but one country confirms that relevant actions are being taken at the national level to promote inclusiveness regarding children's active participation. More particularly:







- 19 countries report that activities are in place (AT, BE, BG, CZ, DE, DK, EE, EL, ES, FI, HR, HU, IE, IT, LT, LV, MT, PT, SE).
- Five countries (CY, IS, NO, PL, SI) point to actions currently in development, while four further countries point to other related activities in this area (FR, LU, NL, SK).
- One country (RO) reports to have no such activities in place.

Some examples of relevant activities included in responses include the following:

- In **Bulgaria**, inclusiveness and participation are covered by the National Children's Assembly Initiative and Child's Ombudsman in Schools. Under these initiatives, children from more than 50 schools have participated in programmes about the role of the Ombudsman.
- In **Estonia**, youth work adheres to the principles that every young person can choose a suitable activity opportunity, meet peers with similar interests, and have an experience of belonging and cooperation. The organisation of youth work is based on the young person, their interests and needs, and creates a safe environment for the young person to test their abilities.
- In Finland, KAVI has published instructional principles towards more inclusive media literacy on the basis that media literacy should be comprehensive in terms of its content, perspectives, target groups, and geographic distribution. By implementing the BIK+ strategy, the Finnish SIC will promote media literacy and online safety for children in vulnerable positions. In addition, different actors and organisations have their own policies and rules to ensure inclusiveness.
- In **Greece**, the Safer Internet Centre's Youth Panel, which also participates in the advisory board meetings of the Greek SIC, fosters inclusiveness through a balance of age, gender, and minorities, who are always represented as members of the Youth Panel.







- In **Ireland**, the importance of inclusivity in meaningful children's participation is explicitly recognised in the Young Ireland Framework. This outlines actions being taken to ensure that the permanent participation structures supported by the government are accessible to seldom-heard young people, including young people living with disabilities, and to provide guidance to policymakers and those wishing to consult with them effectively.
- The Lithuanian Agency of Non-Formal Education engages with vulnerable groups of children by attending events in smaller towns and villages and organising events such as Kultūrų ratas (Wheel of Cultures) for various minorities living in Lithuania. Part of the events are dedicated to understanding the safety online and the topic of online bullying.
- In **Norway**, the government has issued guidance on how youth panels should be put together. It states that the panels should have a good gender balance and be broadly composed and diverse. It is recommended that the participants have different social, ethnic, religious, and geographical backgrounds.
- In **Portugal**, the Choices Programme (Programa Escolhas) is a national programme for social inclusion under the Ministry of the Presidency of the Council of Ministers. It is part of the High Commission for Migration whose main objectives are to promote equality, non-discrimination and strengthening social cohesion through measures that promote participation and citizenship, among other areas of intervention.
- In Sweden, the Swedish Agency for Youth and Civil Society (MUCF) is responsible for strengthening youth participation in democracy nationally. Until 2025, MUCF is coordinating a collaboration with six municipalities and one region. The goal is to develop new methods for increasing young people's knowledge of and participation in local democracy. The focus is on especially promoting the inclusion of young people who, in one way or another, feel excluded from society.





#### b) Publishing child-friendly versions of policies

Regarding a government system, policy or protocol for publishing child-friendly versions of policy documents, only a minority have relevant activities in place:

- Just three countries (ES, MT, PT) report that they currently have a system in place for this.
- Six countries indicate that they have programmes in development (BG, IE, IT, NL, NO, SI), while 14 responded that there is no system available at the national level for this (CZ, DK, EE, EL, FI, FR, HR, IS, LT, LV, PL, RO, SE, SK).
- A further six countries (AT, BE, CY, DE, HU, LU) point to other measures only indirectly related to publishing child-friendly versions of policies (survey response other).

Examples include the Children's Policy Framework 2024-2030, where a part of the Empowering Children's Participation in Malfa is aimed at improving child participation and enabling children to freely express their views and influence any decisions that will affect them. The project will develop an online child participation platform, aid the most vulnerable children experiencing any form of social exclusion, abuse, neglect, and/or psychological difficulties, and build the capacity of policymakers to integrate and improve children's participation in decision-making. The framework is available in a child-friendly version.

In **Portugal**, it is reported that the Safer Internet Centre is responsible for publishing child-friendly versions of relevant policy documents. Additionally, the National Commission for the Promotion of the Rights and the Protection of Young People (CNPDPCJ) translates information/documentation related to these topics into child-friendly language.

#### 3.3.3 Digital creativity

Fostering creative, safe digital experiences is another important aspect of Pillar 3. The BIK+ strategy notes that there is scope to increase activities in this area and, accordingly, country respondents were asked if there were national/regional activities to stimulate the production and visibility of positive digital content and services for children. In addition, countries were also asked if activities were







available to encourage children's digital creativity and to promote creative uses of digital technologies.

The main findings are summarised in Figure 30 below, followed by an outline of different approaches across countries.

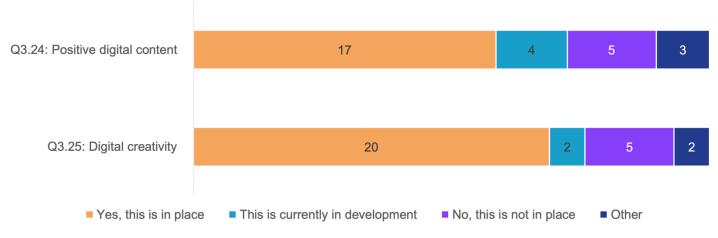


Figure 30: Actions to promote digital creativity

	In place	In development	Not in place	Other
Q3.24: Activities fostering positive digital content	AT, BE, CY, CZ, DE, EL, FI, IT, LT, LV, MT, NO, PL, PT, SE, SI, SK	DK, ES, NL, RO	BG, EE, FR, HR, IS	HU, IE, LU
Q3.25: Activities encouraging digital creativity	AT, BE, CY, CZ, DE, EE, EL, FI, HU, IT, LT, LV, LU, MT, NO, PL, PT, SE, SI, SK	ES, RO	BG, DK, FR, HR, IS	IE, NL

Table 14: Actions to promote digital creativity







#### a) Positive digital content

Measures to promote positive digital content for children are available in most EU Member States, Iceland and Norway:

- 17 countries say that they have actions in place on this topic (AT, BE, CY, CZ, DE, EL, FI, IT, LT, LV, MT, NO, PL, PT, SE, SI, SK).
- Four countries report that new initiatives are currently in development (DK, ES, NL, RO), while three countries indicate that there are other relevant activities (HU, IE, LU).
- Five countries state that measures on this are not available (BG, EE, FR, HR, IS).

Some of the relevant activities, including those in development, reported under this heading include:

- In **Cyprus**, some children's museums and science centres offer exhibits and activities focusing on education through technology and digital content. They also organise various competitions and events to promote the creation of positive and creative digital content by children and young people.
- In the Czech Republic, a project called Regions for Safer Internet offers
  various online modules to stimulate the production and visibility of positive
  digital content and services for children and parents. Non-governmental
  actors, such as the Czech Safer Internet Centre, are also active and have
  many supportive digital materials related to that topic.
- In **Denmark**, the Danish Media Council is developing a quality label for children's content as part of the Danish Media Agreement. The label promotes content with positive values and a certain quality for children.
- In **Germany**, the Federal Agency for Child and Youth Protection in the Media is currently researching child-friendly online services and access to the internet. The main aim is to evaluate existing services for children and access routes in relation to existing needs in this regard. Once the evaluation has







been completed, a funding programme will be drawn up tailored to actual needs.

- **Iceland's** national public-service broadcasting organisation, Ríkisútvarpið (RÚV), created a dedicated RÚV-Kids platform during the global pandemic to help educate children at home and provide child-focused content.
- In Norway, the public broadcaster NRK offers various productions aimed at children and young people, including learning programmes, campaigns and news for children. Additionally, there are public support schemes for content production and development aimed at children and young people. Content for children and young people is a prioritised area for both the Norwegian Film Institute and the Arts Council.
- In **Slovenia**, the Časoris project is an award-winning free online newspaper for children. It offers news children can trust timely, relevant articles on current affairs. Information is put in context and presented in child-friendly language.
- In **Spain**, the Digital Agenda 2026 and the Digital Skills Plan are two key instruments that aim to stimulate the creation of digital content. These initiatives promote the development of digital skills among the population, support the production of high-quality digital content, and foster citizens' participation in the digital economy.

## b) Creative uses of digital technology

Regarding measures to encourage children's digital creativity:

- 20 countries report on actions that are available nationally (AT, BE, CY, CZ, DE, EE, EL, FI, HU, IT, LT, LV, LU, MT, NO, PL, PT, SE, SI, SK), and two countries stated this was an area in development (ES, RO).
- Five countries state that no measures are available (BG, DK, FR, HR, IS), while another two countries (IE, NL) point to measures only indirectly related to fostering creative uses of digital technology (survey response other).







SICs' activities and BIK-related events, such as the annual Safer Internet Day (SID) campaign, featured prominently in the countries' responses in relation to encouraging children's digital creativity and promoting creative uses of digital technologies as the following examples illustrate:

- In Austria, on SID 2024, children, young people, guardians, schools, companies and politicians were encouraged to make their contribution to a safer internet by treating each other with respect, promoting media skills, providing quality services for children and young people, developing safe products for young people, or creating a suitable legal framework. The opportunities for participation are diverse, and creativity is expressly encouraged.
- In Estonia, municipalities are supported with additional funds based on §
  15'1 of the Youth Employment Act so that a larger number of young people
  have access to hobby activities and informal education. In informal education,
  participation in programmes to encourage children's digital creativity and
  creative uses of digital technologies is also supported.
- In Finland, Safer Internet Day celebrated in Finland as Media Literacy
  Week is the main activity to promote the safe and creative use of media
  and digital technologies. It aims to advance the media literacy skills of
  children and young people, as well as to support professional educators,
  guardians and other adults in their important media education tasks.
- In Italy, each year, the Ministry of Education promotes a competition for schools to encourage children's digital creativity and to promote creative uses of digital technologies.
- In **Lithuania**, national STEAM Centres (science, technology, engineering, arts and maths) are actively involved in offering children the opportunity to learn and use their creative skills online, as well as with various equipment (digital and analogue) to create digital and tangible products and empower their creativity.





- In **Poland**, creative activities are very much part of Safer Internet Day, in
  which schools are encouraged to organise initiatives regarding internet safety
  and the positive use of new technologies. Each year, there are thousands of
  such initiatives. The National Curriculum for IT Education also describes skills
  related to digital creativity.
- In Slovakia, the Centre of Scientific and Technical Information, implemented through the consortium libraries, has succeeded in creating a FABLAB model consisting of an open space for the general public to foster creativity, inventiveness, and new technological and innovative practices. Children can participate in a digital skills club, digital technology camps, and many other activities.

#### 3.3.4 Topic summary: Pillar 3 - active participation, respecting children

Regarding Pillar 3, countries report a wide range of actions to promote children's active participation in shaping the digital environment. Key areas of participatory opportunities, inclusivity, and creative expression are represented:

- Active participation: Most countries have programmes that promote active youth participation in the digital environment. This is often achieved through youth councils, government platforms, and collaborations with Safer Internet Centres. Several countries, including Finland, Iceland, Norway and the Slovak Republic, mandate youth participation in decision-making by law. Alongside participation, efforts are made to raise awareness about children's digital rights, with countries like Germany, Hungary, and Iceland offering prominent examples.
- **Digital inclusion:** Countries recognise the importance of bridging the digital divide to ensure all children can actively participate in online spaces. Most countries surveyed have programmes in place or in development to address inclusivity regarding age, gender, location, and the needs of hard-to-reach youth populations. Examples include Bulgaria's National Children's Assembly, Ireland's Young Ireland Framework, and Portugal's Choices Programme.





There is little evidence, however, of providing child-friendly versions of policy documents, with only a few countries having systems in place.

• **Digital creativity:** Encouraging the safe and creative use of digital technology is another priority for many countries. Over half of the surveyed countries offer activities to boost positive digital content and support children's digital creativity. Public broadcasters like those in Iceland, Norway and Sweden were shown to play a crucial role in these efforts. Safer Internet Day (SID) campaigns are especially common in encouraging digital creativity, as seen in Austria, Finland and Poland.





# Chapter 4: Conclusion

The 2024 edition of the BIK Policy Monitor offers an overview of better internet policies and activities across Europe. It provides valuable insights and data that can be used to compare different countries. The BIK Knowledge Hub, which will follow later in 2024, provides additional context through detailed profiles for each country and enables cross-country comparisons. This will also facilitate further exploration of how digital development, policies, actions, and outcomes affect children and young people online (see section 1.2 above).

# 4.1 Policy-making within the BIK+ framework

The 2024 report finds that the BIK+ strategy has resonated strongly with policy developments taking place in EU Member States, Iceland and Norway. While the BIK Policy Map (2023, 4<sup>th</sup> edition) reported similar findings, with three-quarters of countries stating that the BIK+ strategy had influenced their policy-making, there is evidence in this report of increased attention to this topic. All countries were found to have significantly stepped up policy activity in the two years since the BIK+ strategy was adopted. Policy developments were driven, in part, as a response to EU measures such as the adoption of the Digital Services Act package and the transposition deadline of the revised AVMSD in September 2020. However, there are also significant national drivers for these policy developments as evidenced by the establishment of special commissions on children's digital well-being (DK, FR, NO), special purpose youth councils (NL), or national programmes to protect children (HR, RO).

#### 4.1.1 Nature of policy provision

On the evidence of the BIK Policy Monitor, policy development at the national level would appear to develop along two main trajectories.

Firstly, there are many policy initiatives in evidence that, in the post-COVID era, seek to harness digital technologies to enhance learning, bolster digital literacy and skills, and empower learners to benefit from the digital transformation in education.







Experiences of the global pandemic and the forced closure of schools in all European countries highlighted the importance of robust, high-quality digital infrastructure and inclusive digital education strategies that help to secure the benefits of digitalisation for all. Accordingly, countries have sought to reinvest in digital learning platforms, equip citizens with digital skills, and strengthen digital citizenship capabilities for learners and teachers alike. Austria's Acht-Punkte-Plan (Strategy for a Digital School), the Slovenian Digital Education Action Plan 2027, and Italy's National Plan for Digital Education (PNSD) are just some of the many examples of countries elaborating on digital education investments and building for the future. While it was not specifically asked in the survey, it was evident that the Recovery and Resilience Facility (RRF) was an important factor in many such investments.

Secondly, another strand in evidence is those policy initiatives that respond in some way to concerns for children's well-being in the digital environment. The many new policy frameworks highlighted in Chapter 2, as well as new initiatives under Pillar 1 (safe digital experiences) in Chapter 3, illustrate the extent to which online safety has been a priority for legislators and policymakers. Major national legal frameworks, such as Germany's revised Youth Protection Act (Jugendschutzgesetz, JuSchG), or Ireland's new Online Safety and Media Regulation Act 2022, represent significant legislative developments at the national level, which, in conjunction with major EU laws, such as the DSA and AVMSD, place children's online safety and the protection of minors at the forefront of government action.

In addition, governments have sought to future-proof strategies to protect young people and to respond to the many perceived challenges that the digital environment poses by establishing expert commissions, such as Denmark's Expert Commission on the Well-being of Children and Young People, or by outlining longer-term strategies such as in France with the Children Online Protection Lab Charter, Norway's National Strategy for a Safe Digital Upbringing (2021), or the Slovak Republic's National Strategy on the Protection of Children in the Digital Environment. A notable feature of many such strategies is the increasing prominence and recognition given to children's rights in the digital environment, as







illustrated by Malta's Children's Policy Framework 2024-2030, planning for the National Programme for Children in the Digital Environment 2024-2026 in Croatia, or the National Strategy for a Better Internet for Children in Cyprus 2018-2023.

Given the momentum behind such national policy initiatives, it is important to embed effective policy design principles, such as those referred to previously in the BIK Policy Map, under the collective impact model.

#### 4.1.2 Need for coordination

Based on the findings of this edition of the BIK Policy Monitor, despite the significant levels of policy activity, national policy initiatives often appear to be fragmented and lack coordination. Recognising the multi-faceted nature of the different strands of policies supporting children and the digital environment, as evidenced by the reality that policy responsibility sits across multiple government ministries, there is a need for strong coordination mechanisms – grounded on a solid evidence base – to oversee strategy and manage longer-term development of consistent and sustainable policies. In this survey, only seven countries stated that a clearly defined coordination function is in place, with most countries reporting that coordination happens informally. Safer Internet Centres were found to be crucial in the delivery of many BIK+ actions. Given the increasing complexity of legal requirements and the legal framework in general for safeguarding children's well-being online, more resources are needed to enable SICs to carry out this essential role.

#### 4.1.3 Evidence-based policy-making and evaluation needs strengthening

Evidence-based policy-making regarding better internet policies for children was also found to lag behind. Only a quarter of European countries regularly collect data, and periodic surveys are quickly becoming outdated. Only a third of countries have systems in place dedicated to gathering information on children's digital welfare. In one-third of countries, little or no research funding is reported to be available on this topic. No EU-wide surveys of children's experiences of risks and online safety have taken place since funding stopped for the EU Kids Online project.







Systematic monitoring and evaluation are also notably absent in most countries and are thus a significant gap given the importance of this topic in national policies.

# 4.1.4 Stakeholder engagement (especially for children) needs more support

Engaging widely with stakeholder groups is a cornerstone of good practice in developing policies for children and the digital environment. While most countries report high levels of stakeholder engagement in developing policies, there are relatively few dedicated mechanisms for this purpose. Only seven countries reported that there was a dedicated national forum in place for multi-stakeholder dialogue. It may be that accompanying a general transition from self-regulatory approaches to more direct forms of regulation or co-regulation, there is likely to be greater emphasis on regulatory authorities rather than on multi-stakeholder forums. However, it is important that multi-stakeholder dialogue – which is well-established in the international arena, as evidenced in this report by the high uptake of international knowledge exchange – is appropriately supported and sustained.

The involvement of children in policy development is especially crucial, considering the importance of children's active participation as a key theme in the BIK+ strategy (Pillar 3). While children are consulted in many different ways and well-represented through Safer Internet Centre youth advisory panels, only five countries said that children were actively involved in the design of policies which address their participation in the digital environment.

# 4.2 Actions and initiatives implementing the BIK+ strategy

The BIK+ strategy comprises a body of actions that the European Commission, Member States and industry actors collectively deliver to achieve the vision of "age-appropriate digital services, with no one left behind" (p. 9). The BIK Policy Monitor likewise focuses on actions at the country level organised around the three pillars of safe digital experiences, digital empowerment and active participation, and respecting children.







#### 4.2.1 Pillar 1 - safe digital experiences

Pillar 1 of the BIK+ strategy comprises actions to protect children from harmful and illegal content, as well as contact, conduct and consumer risks, and to improve their well-being through a safe, age-appropriate digital environment. This pillar includes many active areas of policy development for EU Member States, Iceland and Norway.

#### a) Responding to EU laws

Enabling legislation to give effect to EU laws is one part of this activity, with most countries having designated competent authorities to act as Digital Services Coordinators under the Digital Services Act. With EU rules on the protection of minors applying to all digital services in scope of the DSA as of 17 February 2024, this is a major area of focus in EU Member States. Just over half of countries also say that there are national codes of practice in place or under development for digital service providers, including voluntary as well as obligatory codes. A similar number also report the availability of consumer codes of practice that seek to enhance children's protection as young consumers and provide guidance on the regulation of influencer activities.

#### b) Harmful online content and reporting mechanisms

On the issue of harmful online content, there is a significant variation among the countries surveyed. As this topic is culturally sensitive and variable, there are few precise definitions of what harmful online content entails. However, some countries have developed targeted measures to deal with specific categories of content like cyberbullying material, pro-anorexia content, or content that promotes self-harm or suicide.

When it comes to processing complaints from children about harmful online content, the primary mechanisms available, in addition to those required of platforms themselves, are the national Insafe helplines and other national helplines and hotlines, which are available in all participating countries. However, the nature of the different support services to receive children's complaints varies





substantially. Further research is needed to assess what would be most beneficial from the perspective of children.

#### c) Addressing harmful conduct

Laws and policies to address the harmful effects of intimate image abuse and cyberbullying are an area of significant agreement among the countries surveyed. 26 of the 29 countries covered in the BIK Policy Monitor report that there are relevant laws or policies in place to address intimate image abuse, while 21 countries have national laws and policies on cyberbullying. Most countries have also prioritised the creation of safe learning environments, free of bullying, that are conducive to good physical and mental health and well-being. Countries vary in their responses as to whether harmful online conduct is addressed by general laws and regulations and those in which dedicated, topic-specific laws have been developed. This is an area in which ongoing evaluation and sharing of good practices would seem to be especially important.

#### d) Age verification and digital identity systems

Age verification and the development of digital identity solutions that may be used to prove age are a matter of significant current debate in nearly all countries. Few examples exist currently of established systems. However, the majority of countries indicate this is under review, and a number of national authorities (e.g. ES, IE, IT, NL) have issued guidelines on principles of effective age assurance. Regarding digital identity systems, just under half of countries have systems in place that are available to minors. However, these typically are only available to those over 14 years of age.

Among the main gaps under Pillar 1 where further development may be needed include clearer definitions and consistent approaches to dealing with harmful online content, child-friendly reporting mechanisms that are more accessible and supportive for children, and further policy development on more effective age verification and more robust mechanisms to limit minors' access to content and services that may be harmful to their development.





#### 4.2.2 Pillar 2 - digital empowerment

The focus of Pillar 2 is digital empowerment and equipping children with the skills and competences needed to thrive in the digital environment.

#### a) Online safety and digital skills in formal education

As acknowledged in the BIK+ strategy, most countries have strategies in place for developing digital skills. Online safety appears to be well-embedded within national curricula, according to country respondents. Schools also receive support in the development of online safety policies, including topics such as cyberbullying prevention. Much work has been carried out in harmonising approaches to digital skills using the Digital Competence Framework for Citizens (DigComp) while enhancing teachers' digital competencies, which also receives wide attention. The inclusion of digital citizenship skills in the curriculum is also a noteworthy positive development. How schools integrate digital technologies and regulate their use appears to vary widely, although individual policies have not been examined in detail.

#### b) Enhancing digital literacy

As a cornerstone of Pillar 2, digital literacy initiatives are present in nearly all countries and are embedded in both formal and informal learning settings. Safer Internet Centres were reported to be especially important in promoting informal education and promoting peer-to-peer learning programmes for online safety and digital skills. Media literacy and the fostering of digital civil courage also emerge as prominent themes in many national programmes for digital literacy.

Actions under Pillar 2 demonstrate diverse and innovative approaches used to build children's digital resilience, critical thinking, and responsible online behaviour. While many countries have strong digital empowerment programmes, there is still room for ongoing improvement and collaboration across countries in areas such as teacher training, particularly in emerging areas of online safety, as well as the sharing of best practices and innovative measures to enhance the effectiveness of digital empowerment efforts.





#### 4.2.3 Pillar 3 - active participation, respecting children

Active participation and respect for children are distinctive features of the BIK+ strategy. As shown in Chapter 2, children's rights have received increasing attention in many national policy developments and feature prominently in newer, more integrative approaches. Only a few countries, however, have systems in place to support children's involvement in policy development.

Under Pillar 3, while most countries report activities to promote active participation, just over half of countries say this is mandated or grounded in national law. Some innovative practices were identified where children are supported to provide direct input to policymakers. The Netherlands' Youth Council on Digitalisation is an example of this, while in countries such as Croatia and Malta, an Ombudsman for children has played a key role in facilitating children's participation. Youth advisory panels for Safer Internet Centres are a noted example of youth participation in many countries. However, children's active participation as digital policymakers remains at a relatively early stage of development; there is further scope for development on this topic, including the use of the EU Children's Participation Platform.

Countries report various activities to promote inclusivity and tackle the digital divide. However, this area requires more detailed evidence and data collection, as well as ongoing close evaluation. Positive digital content and digital creativity are similarly supported, especially by public broadcasters and Safer Internet Centres. However, when it comes to publishing child-friendly versions of policy documents, very few countries actually have a system in place for this.

# 4.3 Recommendations

Based on the insights gained from the BIK Policy Monitor iteration 2024, the following recommendations could support EU Member States, Iceland and Norway in improving their approaches to BIK+ policy-making and implementations of BIK+ actions across the three pillars.





#### 4.3.1 Overarching recommendations on policies

- Create integrated policy frameworks that combine the policy goals of protecting children online, supporting their digital empowerment, and facilitating their active participation, ensuring policy cohesiveness and effective alignment with the BIK+ strategy.
- 2. Ensure that national coordination platforms, including Safer Internet Centres, are well supported to facilitate the delivery of BIK-related actions and maximise their effectiveness.
- 3. Enhance national data collection and research systems to better understand children's experiences of the digital environment and support better regulatory knowledge, evidence-based policy, and informed evaluation. Additionally, develop a European evidence base of children's experiences of online risks and safety to facilitate knowledge sharing and cross-country comparisons.
- 4. Establish, where none currently exists, a dedicated national multistakeholder forum to inform better internet policies for children. This should include key national expertise, including Safer Internet Centres, Digital Services Coordinators, researchers, parents, teachers, and others working with children.

#### 4.3.2 Recommendations on BIK Pillar 1

- 5. Support the development of an EU approach to age assurance and age verification policies and practices that are consistent and compatible with European standards and digital identity systems. These systems should protect privacy while also respecting fundamental human rights, including children's participation rights.
- 6. Implement systematic evaluation of the current laws and regulations in place to protect children from online harms such as intimate image abuse and







cyberbullying to ensure effectiveness and fitness-for-purpose from the perspective of the child.

#### 4.3.3 Recommendations on BIK Pillar 2

- 7. Ensure that digital literacy initiatives keep pace with advancing technologies, including generative AI and immersive worlds, as well as changing user trends, and evidence of risks and opportunities. Also, ensure that education professionals are appropriately supported.
- 8. Continue efforts to ensure that all children have equal, effective, safe and inclusive access to digital technology, including children in vulnerable situations, children at risk of poverty and social exclusion, and children living in rural and remote areas with inadequate broadband infrastructure.

#### 4.4.4 Recommendations on BIK Pillar 3

- 9. Establish age-appropriate and adequately resourced mechanisms to facilitate children's active participation in digital policy development in accordance with established children's rights frameworks.
- 10. Further develop the use of best practices for active participation, including digital participation, to facilitate the inclusive involvement of children in shaping policies regarding the digital environment.





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