

Commission of Independent Experts on the Protection of Children and Young People in the Digital World

A Review – Synopsis –

This review covers a broad range of areas and addresses a variety of levels:

- I The first part explores digital environments, threats, impacts, vulnerabilities and opportunities for participation;**
- II The second part describes the current status of media literacy education, prevention, teaching practice and support structures in Germany;**
- III The third part reviews the current legal situation as well as regulation, enforcement and the legislator's framework for action.**

The review does not reduce the topic to a single perspective but presents it as a complex, multi-faceted field.

It does not anticipate any recommendations but forms the basis for further debate and the development of recommendations for action. It is intended to reveal developments, threats, structures, gaps and areas for action.

The review does not prioritise individual measures but gives a structured overview: It demonstrates that protection, empowerment and participation can only be adequately understood by considering risks, education, prevention and regulation holistically.

PART I:**Age-specific threats and opportunities for participation of children, young people and adolescents with regard to physical, mental and social health as well as legal (and criminal law) implications of the use and design of digital services**

The first part starts with the digital environment in which children and young people live today. It describes a deep transformation of the media environment, characterised by social media services, mobile devices, smart technologies and AI-backed applications. Digital media is ubiquitous, highly interconnected and an integral part of the everyday lives and development of children and young people. The smartphone serves as a key access point to communication, entertainment, information, social inclusion and, increasingly, productive AI-based applications. The report describes the digital world as a key space for socialisation and everyday life.

On this basis, the first part provides a systematisation of **online threats**. It focuses on **interaction risks**, which have become much more important with the use of social media. This includes risks resulting from digital communications, social visibility and constant availability: cyberbullying, discrimination, hate speech, violations of sexual boundaries, unwanted messages containing sexual content or manipulative attempts to make contact, such as cybergrooming, among other things. These risks result particularly from communication dynamics, platform architectures and social relationships, which distinguishes them from traditional content risks.

As regards **hate, extremism and depictions of violence**, the report points out that these phenomena not only impact those directly affected. Hate content has an overall impact on social communication, can undermine empathy, normalise hostility and encourage people to withdraw from public discourse. Extreme depictions of violence swiftly circulate via feeds and messenger services and can cause distress, anxiety, sleep disorders and other psychological burdens. The report shows that risks not only arise from active searching but often also from the visibility and sharing of that content on platforms.

A second large complex concerns **sexualised violence and boundary violations**. The review covers a broad spectrum: unwanted confrontation with pornography, solicitation for sexual purposes, sexting-related boundary violations, sextortion, cybergrooming, depictions of sexualised violence against minors and commercial sexual exploitation. What is particularly relevant here is that the digital sphere not only depicts existing forms of violence but also creates its own dynamics, reaches and technological possibilities – for example with AI generated content or digital manipulation.

As regards **self-harming behaviour**, the review points out that certain content and use patterns may be particularly problematic. Content on non-suicidal self-harm, eating disorders, extreme beauty standards or weight-loss trends often have a negative impact and can reinforce

problematic behaviour patterns. The review expressly points out that it is not only the duration of use that is decisive but, in particular, the nature of the content and its social amplification in platform environments.

In addition, there are risks resulting from the **behaviour of other people**, such as sharenting and family influencing. Children's rights, personal rights and the right to informational self-determination are affected by parents or family influencers with a large reach who publish intimate or emotionally difficult situations of children. Children not only need protection in digital spaces from service providers or other minors but also from their immediate family environment.

Digital behavioural addictions are a major health problem, in particular for children and young people. Both excessive gaming and the intensive use of social media are widespread and can significantly impair their development and participation. Despite their relevance, these disorders are not recorded systematically in the German health system yet.

Risks are not only attributed to user behaviour but also significantly to **platform-specific and technological drivers**. In particular, this includes dark patterns, i.e. manipulative design and user elements inducing users to take unintended or thoughtless actions. They can encourage the disclosure of data, increase cost risks, facilitate in-app purchases, boost excessive usage or perpetuate social comparison dynamics. Due to their lack of experience, development stage and limited ability to self-regulate, children and young people are particularly susceptible to this.

AI systems are described as a separate risk complex. The review describes five key areas: discriminating or toxic communication patterns, information risks, interaction risks, privacy risks and abusive use intentions. AI applications can present incorrect information in a convincing way, normalise problematic statements, simulate emotional intimacy, encourage the disclosure of sensitive data or be used for deepfakes, cyberbullying, deep nudes and manipulative impersonation. The review also stresses that there are still research gaps, in particular on development- and age-specific AI risks.

How digital media impacts the development of children and young people is heavily dependent on **vulnerabilities**. Early childhood, psychological disorders, trauma experience and sociodemographic factors influence the impact of digital media. As regards small children, the review particularly highlights the risks of unaccompanied or passive screen exposure, parental distraction or impaired interaction. Passive screen time can impair their language development by reducing verbal interactions and shared attention. While their neural control systems are still developing, small children are particularly susceptible to highly stimulating content; this can lead to distractibility and attention problems. In addition, negative feelings and sleep disorders may occur, especially when digital media is used in the evening. Young people who have experienced psychological distress or traumas are more at risk from issues connected with comparison processes, feedback dynamics, increased vulnerability to

victimisation and risky online interactions. Other impacts include the physical effects of increased or excessive usage, for example on sleep, concentration, metabolism or eyesight.

In addition to the risks, the review also addresses **development prospects and participation opportunities connected with digital media**. Social media can strengthen social connection, build and strengthen friendships, enable a feeling of belonging and give marginalised young people spaces where they can be part of a community, find support and express their identity. Digital spaces can be low-threshold places for queer young people, ethnic or religious minorities and persons with disabilities or chronic illnesses to find recognition and social support. Other positive impacts include political participation and solidarity activities.

In education, **AI applications** offer some potential, for example by providing individualised explanations, adaptive learning material or support for schoolwork. It is also mentioned that despite its risks, AI can also be used as a protection tool, for example for automated recognition of problematic content, even if there are clear limits.

From a **crime prevention perspective**, young people are rarely to almost never willing to report cybergrooming or hate crimes to the police. However, the older the children and young people, the more willing they are to seek help from the police. The willingness to report cases to the platforms is strongest.

- Digital media is a **key part of the everyday lives and social environment** of children and young people.
- The risks and threats are **diverse and multi-faceted, and their impact depends heavily on vulnerabilities. Determining factors include the neurodevelopment of a person, the content to which the person is exposed, the platform design and AI systems that have not yet been extensively researched.**
- Risks and opportunities exist **side by side**; part I therefore describes a digital environment that makes **protection, empowerment and participation** relevant **at the same time**.

PART II:**Teaching media literacy to children, young people, parents and professionals; prevention measures plus current practice and implementation status as regards the protection of children and young people in the media; media literacy and education**

Promoting media literacy, media education and prevention does not take place in isolation in a single place. Moreover, a whole support architecture is relevant: family and early childhood, daycare, schools, child and youth welfare, out-of-school work with children and young people as well as parental education. This distribution is both an opportunity and a challenge: On the one hand, there are different starting points; on the other hand, this is precisely why networking, coordination, reliability and a clear overview are particularly important.

In **early childhood**, media education primarily takes place in the families. At this age, digital and social media mainly matter because parents and attachment figures use them. The impact depends on the scope, quality and use context. Excessive screen times, parental distraction and phubbing/technoference (the disruption of face-to-face conversations caused by people's attention being diverted to a digital device) entail development risks. At the same time, age-appropriate, high-quality content embedded in communication can provide positive stimuli. How parents deal with media in their parenting behaviour plays a key role. Early childhood media education is a task that not only focuses on the children but also on their parents.

Daycare centres, paediatricians, early intervention services and family assistance programmes are important sources of support. They can offer advice, provide early support, respond to problematic family systems and help parents with their children's media education.

In the **school** sector, media literacy education is enshrined as an interdisciplinary task in the curricula of all 16 federal states. The way it is implemented varies considerably. In practice, media literacy education depends on the children's federal state, school or teacher. It is not the case everywhere that children are systematically prepared for digital challenges, educated on ways to protect themselves and informed about legal standards from their first year in school. Moreover, there are substantial differences between the federal states and the types of schools as well as skills shortages among a significant part of the pupils.

Out-of-school use of digital media and the use of digital technologies in the classroom can only have a positive impact on education if they are used in a targeted manner and are integrated into high-quality teaching. Schools are a key setting to reach all children and young people as well as their parents with preventive measures; however, the school's responsibility for this topic does not in itself guarantee effective media literacy.

Child and youth welfare services as well as family welfare services also play an important role. Media education and the development of media-related skills take place there primarily through prevention, advice and the protection of minors through education. This support not only addresses young people but also their parents and other guardians and has an impact on

the community. Digital media and AI applications are part of professional practice, for example in the form of digital support services. Child and youth welfare as well as family welfare are not only complementary sources of education but also part of a wider protection and support infrastructure.

Further media literacy programmes for children, young people and parents, for example from providers of out-of-school child and youth services or federal state supervisory authorities for private broadcasters, make an important contribution to education and prevention. However, these services are not always available nationwide or consistently.

Parental education varies across Germany, and support for parents is not organised in a systematic manner.

- There are media education and prevention initiatives in Germany; however, they do not exist everywhere, are often not mandatory and structurally fragile.
- Families, daycare centres, schools, youth welfare services, out-of-school child and youth services as well as parental education play an important role for media literacy and build on one another.
- As risks vary depending on the different development stages and are unevenly distributed across society, it is even more important that children and young people be supported at different complementary levels.

PART III:**Current regulatory framework and its implementation and enforcement; protective measures by the providers (age verifications and security settings for children and young people) and their impact**

The protection of children and young people in digital environments is already extensively regulated at EU, Federal Government and federal state levels. However, these regulations overlap significantly and applying them is complex. There is no general lack of regulation. On the contrary, the challenges are ensuring the consistency of the regulations, defining their scope precisely and enforcing them effectively vis-à-vis large, international platforms.

At EU level, the **Digital Services Act (DSA)** is the key horizontal regulation for the protection of minors on online platforms. It obliges providers of online platforms accessible to minors to take appropriate and proportionate measures to ensure a high degree of privacy, security and protection. This means that the DSA focuses primarily on structural due diligence obligations, governance requirements and – for very large platforms – systemic risk control. In addition, it prohibits advertisements based on profiling for minors.

The **Guidelines on the Protection of Minors** published by the Commission in July 2025 set out this approach in more detail. They concern age assurance, default settings, recommender systems, communication and contact features, monetisation mechanisms, complaint procedures and parental support, among others. These guidelines do not constitute legal provisions but provide important guidance on the interpretation and application of the DSA.

In addition, further **EU legislation** remains relevant, particularly the Audiovisual Media Services Directive (AVMSD) and data protection law, mainly the General Data Protection Regulation (GDPR). The AI Act also intersects with the protection of minors in the media.

At Federal Government level, the **Youth Protection Act** is the key basis and formulates objectives for the protection of children and young people in the media. The German Digital Services Act complements this by providing national regulations on competence and enforcement, underpinning the European DSA.

At the federal state level, the **Interstate Treaty on the Protection of Minors** is the key legislation on content-related protection of minors in the media, advertisements, video sharing services and supervisory measures. It has been in force since 1 December 2025 in an amended version.

National regulatory options are restricted through harmonised obligations under EU law, the country-of-origin principle and constraints based on fundamental rights. However, there is still scope for independent regulation and enforcement in the German legislation on protection of minors in the media, in particular beyond the platform obligations fully harmonised under EU law. When developing the recommendations for action, the Commission of Experts also wanted to examine what regulatory approaches on age restriction and verification exist at the

European and national levels. For this purpose, European and non-European initiatives have been analysed.

In the field of **education**, the focus is less on repressive regulation than on **empowerment**. The protection of minors through education under the Eighth Book of the Social Code as well as family education programmes make a significant contribution to media-related prevention and the development of media literacy. However, the specific designs vary from federal state to federal state and in practice.

- The legislation for the protection of children and young people in digital media is already well developed, but the provisions overlap considerably.
- The DSA is the key EU legislation for the protection of minors on online platforms but is not the only relevant standard.
- The main practical difficulties arise less from the existing regulatory framework but from its consistent application, age verification and effective enforcement.
- National complements are still possible but must remain within the limits set by EU harmonisation and the requirements under fundamental rights.