

STRENGTHENING DEVELOPMENT, TAKING RESPONSIBILITY

To ensure that children and young people grow up
safely in the digital world

Recommendations for action
from the Commission of Independent Experts on
the Protection of

Children and Young People in the Digital World

Table of Contents

Forward by the Chair	5
Information for readers	8
1. Introduction	9
1.1 The Commission's mission and working methods	9
1.2 From assessment to recommendations for action	10
2. Basic concepts and guiding principles	11
2.1 Protection, empowerment and participation as the three pillars of a positive and nurturing upbringing	12
2.2 Building on proven methods, enabling scalability, and strengthening implementation	13
2.3 Trust and flexibility for those ready and available to help	14
2.4 A sense of shared responsibility and a tailored approach to families	15
2.5 Strengthening effectiveness: Co-ordinated protection of children and young people	15
2.6 Acting with foresight: Embracing the challenges of AI	17
2.7 Two perspectives on the recommendations	17
3. A development-oriented perspective – from birth to early adulthood	20
3.1 Phase I 0–2 years: A safe early childhood	20
3.2 Phase II 3–5 years: Guided early media literacy	21
3.3 Phase III 6–9 years: Safe exploration and learning the basics	21
3.4 Phase IV 10–12 years: Navigating the digital world with confidence	22
3.5 Phase V 13–17 years: Participating on one's own terms and making use of support	23
3.6 Phase VI 18 years +: Growing up and coming of age	23
3.7 Tasks spanning across different phases	24
4. Responsibility-based model – Who needs to take action?	26
4.1 Parents and family	27
4.2 Early education, school, vocational training and higher education	35
4.3 Child and youth services and social work	45
4.4 Health, counselling and therapy	55

4.5	Complaints offices, specialist agencies and public safety authorities	62
4.6	Platforms, service providers and the internet industry	68
4.7	Research	92
4.8	Overall governance and involvement	95
5.	Conclusion and overview	100
6.	Appendices	102
6.1	Appendix A – List of recommendations for action	102
6.2	Appendix B – Strengthening development, taking responsibility	105
6.3	Appendix C – Glossary of key terms	107
6.4	Appendix D – List of abbreviations	111
6.5	Appendix E – Authors	112
	Legal notice	115

Note from the editor

Wherever possible, this publication avoids the use of explicitly female or male pronouns in order to reflect gender diversity in the language used. Instead, neutral terms are used (e.g. ‘staff’, ‘professionals’, ‘persons’). Where this is not possible, plural pronouns (e.g. ‘they/them’) are used in accordance with the official rules of English spelling and to ensure the document is accessible to everyone. All genders are implied.

Forward by the Chair

Children and young people are growing up in a world where they're completely surrounded by digital media. Social media, digital platforms and, increasingly, artificial intelligence (AI) applications are shaping the environments in which they're exposed to information, their recreational activities, their social relationships, their learning processes, including the way they participate in society. This development opens up new opportunities for young people in the areas of education, communication, creative expression and social participation. At the same time, new dangers and risks are emerging. Children and young people are exposed to disturbing or manipulative content, come into contact with abusive individuals, are drawn into situations of bullying or risky challenges, are persuaded to make purchases or subscribe to services, or develop addictive patterns of use. Algorithmic systems influence the processes by which information is formed and opinions are shaped. Generative AI opens up opportunities for learning and innovation, but at the same time raises fundamental questions about transparency, accountability, data protection, (para-)social interactions and the protection of young people.

The pace of these developments poses a major challenge for families, educational institutions, policymakers and society as a whole: The digital worlds in which children and young people find themselves are changing faster today than the institutions that are supposed to protect, support and empower them. The protection of children and young people must therefore not be seen as a reactive response to technological innovations. It must become an integral part of shaping the digital transformation. In this context, and in accordance with the coalition agreement for the 21st legislative period, the Federal Ministry of Education, Family Affairs, Senior Citizens, Women and Youth has set up the Commission of Independent Experts on the Protection of

Children and Young People in the Digital World. Its objective is to analyse the risks, challenges and opportunities presented by digital technologies for children and young people, and to develop specific recommendations for a proactive approach to their use.

From the outset, the Commission has agreed that the debate must not be reduced to the question of how risks can be mitigated. The protection of children and young people in this day and age involves more than just protection. It encompasses both the ability of youth to use digital technologies independently and their active participation in a digital society. Protection, empowerment and participation are not mutually exclusive objectives. This triad forms the common foundation for successfully navigating the early stages of adolescence in the digital age.

There has been a significant increase in discussions on this topic and an improvement in the quality of dialogue over the past weeks, months, and years. Numerous social and political actors at all levels have put forward ideas and positions, some of which are conflicting. These debates have highlighted at least two aspects: (1) The need for a balanced approach to protecting children and young people in the digital world is greater than ever; (2) The challenges are too complex to be tackled with simple solutions. Neither uncritical optimism

about technology nor a policy of bans alone will meet the needs of children and young people. What is needed, rather, is a balanced strategy that effectively mitigates risks, opens up opportunities and consistently places the rights of young people at the forefront.

These recommendations are intended as a contribution to an active policy-making approach in the digital age. They are aimed at politicians, administration, public safety agencies and the police, educational institutions, child and youth welfare services, academia, the business sector, civil society and, last but not least, children and young people themselves, as well as their parents. Their shared objective is to shape digital environments in such a way that young people can grow up safely, realise their potential and participate in social developments on their own terms.

We would like to thank all the members of the Commission for their dedicated, constructive and trusted cooperation. The diversity of expert perspectives from academia, industry, public administration and civil society has played a key role in enabling a nuanced analysis of the complex challenges facing the protection of child and youth in the digital world and in developing sound recommendations.

We would also like to extend our heartfelt thanks to the several hundred experts who have shared their knowledge and expertise with us through hearings, bilateral discussions, written submissions and valuable insights.

And, of course, children and young people deserve special mention. Their views and suggestions have been continuously incorporated into the Commission's work through a nationwide series of workshops organised and supported by the Stiftung Digitale Chancen (Digital Opportunities Foundation), as well as through round-table discussions and other talks.

Carrying out a process of foresight with PD – Berater der öffentlichen Hand GmbH was of great help to the Commission. This made it possible to take potential future developments into account at an early stage and to formulate sound and practical recommendations for action.

We would also like to thank the advisory members of our commission – representing the federal states, ministries and federal government commissioners – as well as the organisations and bodies that have addressed the issue of child and youth protection in the digital world either prior to or in parallel with our work, for their constructive dialogue. Particular mention should be made of the German Ethics Council and the European Commission's Special Panel on Child Safety Online.

We would also like to extend our special thanks to the administrative office provided to us by the Federal Ministry of Education, Family Affairs, Senior Citizens, Women and Youth. Thanks to their professional expertise and reliability, the staff at the office have made a significant contribution to the success of this report. We would like to extend our sincere thanks to Chris Piallat for his ongoing coordination of the Committee's work, to Claire Kersting for her excellent work on content and editing, and to Patricia Kluge and Magdalena Gande for organising the meetings. Without their dedication and professionalism, it would

not have been possible to draw up these recommendations to this standard and on this scale. We would also like to thank the staff of Department 614, 'Youth Protection Act, Protection of Children and Young People in the Media, Growing Up in the Digital Age', at the BMBFSFJ, whose expertise and advice were particularly valuable.

Last but not least, we would like to thank Minister Karin Prien for her confidence in our professional work.

Digital transformation will profoundly change young people's lives in the coming years in ways we haven't yet seen. Whether this leads to greater equality of opportunity, increased social participation and more opportunities for personal development is not a technological question. It is a task that requires social and political action. The recommendations set out in this report are intended to help ensure that Germany carries out this task resolutely, responsibly and in the interests of the younger generation.

Olaf Köller and Nadine Schön

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

in June 2026

Information for readers

The recommendations are derived from two complementary perspectives. This is preceded by the development-oriented perspective (Chapter 3). It focuses on the adolescent's life story and organises the recommendations according to the stages of life, from early childhood through to adulthood. It shows when and why a certain measure is important for children and young people. The recommendations in this section are deliberately brief and are initially presented only as numbered headings. These are clickable and linked to the relevant recommendation for action (RFA) in Chapter 4. *Note: Press the [Alt ←] key combination to return to the original part of the text.*

The individual recommendations for action are only set out in detail afterwards – in the responsibility-based model (Chapter 4). Each recommendation is attributed to the relevant stakeholders – ranging from parents, educational institutions and youth support services, through to the health industry and public safety authorities, and including online platforms, legislation and research – and follows this pattern: Problem, recommendation, impact. The full recommendations for action, including detailed descriptions of the issues and objectives as well as other factors, will be published online by mid-July 2026 (<https://www.bmbfsfj.bund.de/bmbfsfj/themen/kinder-und-jugend/expertenkommission-kinder-und-jugendschutz-in-der-digitalen-welt>).

A complete list of recommendations for action is set out in [Appendix A](#).

The pictograms: Each recommendation for action in Chapter 4 is accompanied by a series of pictograms at the bottom of the page. You can identify the recommendation at a glance: which area of the 'triangle of children's rights' it focuses on and at which stage of life it applies; which political and legal level is responsible; and who is to implement it and by what means. A separate icon indicates recommendations relating to AI.

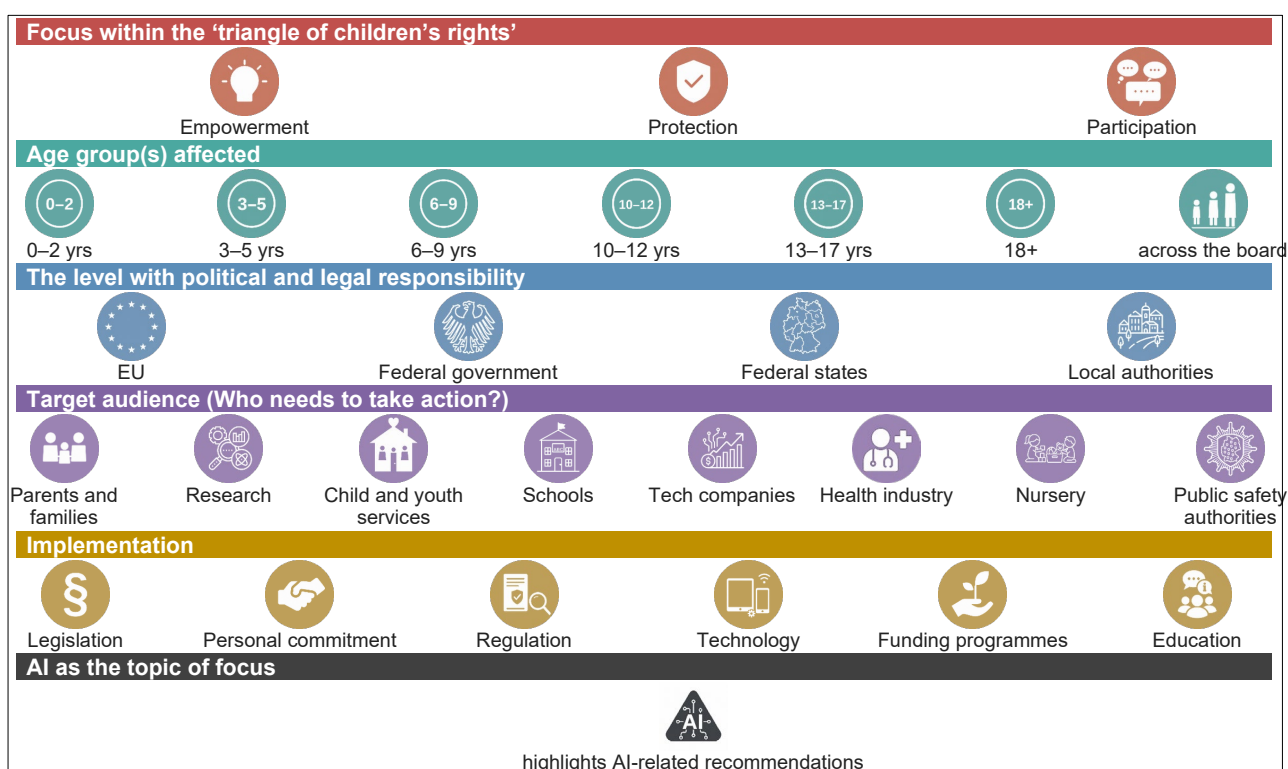


Figure 1: Pictogram directory

1. Introduction

1.1 The Commission's mission and working methods

Here, the Commission of Independent Experts on the Protection of Children and Young People in the Digital World presents its recommendations for action. The Commission was established in September 2025 by Federal Minister Karin Prien to draw up recommendations for action and a strategy for the digital protection of children and youth, in accordance with the coalition agreement. Their task was to translate scientific findings, the legal framework and practical experience into specific recommendations for action tailored to the target audience.

This task required more than just a reassessment of the opportunities and risks of digital media. The Commission had to consider various developments in their broader context: protection against dangers and abuse, as well as the health implications of media use and platform design; the latent erosion of democratic norms, the culture of public debate and social cohesion; the rapidly growing importance of artificial intelligence; and the question of how children, young people, parents and professionals can acquire the necessary media and digital skills. At the same time, it was necessary to clarify the respective responsibilities of service providers, government bodies, educational institutions, support services and families, and to determine at which level action should be taken – at local, regional, national or European Union level. It is only through the interaction of these levels and stakeholders that it becomes possible to close gaps in protection.

The recommendations are guided by the rights and best interests of the individual child, not by the logic of existing authorities. The guiding principles throughout this entire process were always the threefold approach of protection, empowerment and participation. Children and young people should be protected from structures that hinder their development, as well as from unlawful content and abuse. At the same time, they should acquire the knowledge, judgement and practical skills needed to use digital services independently and responsibly. And they should be able to benefit from the educational, communication and creative opportunities offered by the digital world.

From the outset, the Commission has adopted a 'child-focused' approach based on the principle of 'supported participation' and has systematically taken young people's perspectives into account. In nationwide workshops led by experts, children and young people shared their experiences and needs. Hearings, statements and discussions with numerous experts from academia, the professional sector, regulatory bodies, civil society and the business community contributed to a more comprehensive overview on this topic.

The Commission worked independently and on the basis of evidence. Where reliable research findings are available, the recommendations are based on established evidence. Where the knowledge base is still limited – particularly in the case of new applications of artificial intelligence – the Commission assesses justified risks in a proactive manner and is guided by the principle of precaution.

1.2 From assessment to recommendations for action

The recommendations are the second outcome of a phased approach. During its first phase of work, between October 2025 and February 2026, the Commission drew up a comprehensive [review](#), which it published on 20 April 2026. This report is divided into three parts, which describe the digital environments, opportunities for participation and risks faced by children and young people; the structures of media education, prevention and educational practice; and the legal framework and its enforcement. It deliberately did not yet contain any recommendations. Its aim was to establish a common, scientifically sound foundation and to highlight what is known, where effective structures exist, where knowledge is lacking, and why existing instruments often only have a partial impact. This is precisely where these recommendations for action come in. They translate the findings of the assessment into concrete steps and identify the parties responsible for carrying them out.

Three key findings from the review have had a particularly significant influence on the recommendations. The impact of digital media depends not only on the length of time spent using them, but also on the content and features used, the design of the services, individual vulnerability and adult supervision. Opportunities and challenges are unevenly distributed. At the same time, Germany is not starting from scratch, as there are tried-and-tested services, well-established structures and a comprehensive national and European legal framework in place. The real problem therefore lies less in the absence of rules or strategies than in their reliable implementation – in secure funding, qualified staff, accessibility, common standards and cooperation across disciplines.

The recommendations should not be viewed as a collection of separate, independent measures, but as a coherent whole. Some address acute security vulnerabilities and can be tackled in the short term. Others assume that legislation, a joint approach by the federal and state governments, or European regulations will be required. Still others focus on the long-term development of skills, structures and knowledge. The underlying principles from which they stem, and the two perspectives from which they are explored below – focusing on the life stages of children and young people, and on the relevant stakeholders – are described in the following chapter.

This marks the second milestone in the Commission's work. Integrating this into a coherent overall strategy is the task of the next stage of the process.

The expert commission will submit its final report, together with all the documentation relating to the processes described above, in mid-September 2026, at which point its mandate will have been fulfilled and its term will have come to an end.

2. Basic concepts and guiding principles

“Every child’s rights must be respected, protected and realised in the digital environment.”

UN Committee on the Rights of the Child, General Comment No. 25 (2021), paragraph 4

The rights of children and young people, as enshrined in the UN Convention on the Rights of the Child and as further elaborated by the Committee on the Rights of the Child in General Comment No. 25 on the digital world, were central to these recommendations for action and the accompanying texts. The fundamental point underlining this discussion is that children’s rights apply without restriction in the digital environment as well. Digital spaces are not separate unto themselves but rather permeate all areas of life. They shape communication and social relationships, education and recreation, information, everyday work life, and cultural and social participation. Digital transformation therefore does not alter the validity of children’s rights, but it does change the conditions under which they can be exercised, protected and realised. The digital revolution does not alter the need to create a positive analogue environment for children and young people.

The recommendations for action are based neither on a fundamentally defensive view of digitalisation nor on one that is uncritical and views technology in an optimistic light. Their aim is to show how children can enjoy a positive, nurturing upbringing in an increasingly media-saturated and digitalised world. Children and young people should be protected from risks, illegal content, unsolicited contact, abuse and structures that hinder their development; they should develop the skills to use digital media in a self-determined and responsible manner; and they should be able to participate in the digitalised world. Protection, empowerment and participation form a triad in this context. None of these aspects should be considered in isolation; rather, they must be well coordinated with one another.

In accordance with the General Comment of the UN Committee set out above, rights must not only be respected and protected, but also realised. This involves a specific task of implementation. Children’s rights must be effectively upheld in the day-to-day lives of families, in educational and childcare settings, and within child and youth welfare services, as well as within the health and social care system, in the creation of digital services, and in the areas of regulation, supervision and law enforcement. No single actor and no single measure can fulfil this task on its own.

This chapter therefore sets out the basic principles from which the following recommendations are derived. The list of recommendations for action is informed by five guiding principles: (1) to build on sustainable structures and best practice, (2) to provide local stakeholders with appropriate scope for decision-making and shaping policies, (3) to organise responsibility in a way that is both binding and collaborative, (4) to reduce friction at points of intersection, and (5) to take ongoing account of technological developments.

These principles serve as criteria for the formulation and implementation of the recommendations for action. They are intended to help ensure that approaches derived from specialist knowledge result in reliable, accessible structures that are effective in everyday life.

2.1 Protection, empowerment and participation as the three pillars of a positive and nurturing upbringing

Protection, empowerment and participation are three closely interlinked dimensions of the realisation of children's rights in the digital environment. Protection does not merely involve responding to damage that has already occurred. It also calls for risks to be mitigated proactively, for safe and age-appropriate activities to be organised, and for effective support to be provided when children or young people experience distressing or unlawful situations. Empowerment means fostering knowledge, judgement and the ability to take action. This also includes the ability to self-regulate, the critical evaluation of content and technical systems, and knowing where to find support. Ultimately, participation encompasses access to digital spaces for education, communication and experience; the opportunity to express one's own views, to help shape and influence decisions; and attractive, age-appropriate activities.

The three dimensions are interdependent. Protection creates the conditions that enable children and young people to explore and use digital spaces without being exposed to avoidable risks. These skills enable them to seize opportunities, identify risks and remain capable of taking action in difficult situations. Participation ensures that young people are not treated merely as those in need of protection, but as holders of their own rights and as active contributors to shaping their own lives. One-sided approaches therefore fall short. Protection must not result in broad-based exclusion; empowerment must not lead to structural responsibility being shifted onto children and young people; and participation must not mean leaving them to fend for themselves, unaccompanied, in unsafe or unsuitable environments.

How these rights are realised in practice depends on a person's age, stage of development and individual circumstances. Young children need different environments in which to feel safe and gain experience than teenagers do. The review of the current state of research, presented by the expert commission in spring 2026, clearly shows that the impact of digital media on the development of children and young people depends heavily on the broader context. Socio-economic disadvantages, traumatic experiences and mental health disorders make children and young people vulnerable and also shape the impact that digital media has on them. However, vulnerability also depends on the stage of life, which is why the recommendations are tailored accordingly. At the same time, families and organisations differ in their opportunities and abilities to support children's use of digital media and to make use of educational resources. That is why the list of recommendations combines a development-oriented perspective with a clear allocation of responsibilities amongst the stakeholders. The participatory initiatives involving children and young people, as well as the Commission's consultations and hearings, have highlighted one key point: that young

people demand protection. They are calling on politicians, legislators, educational institutions, the police and digital companies to take responsibility. At the same time, they want to understand, make their own decisions, find support and be involved in shaping digital spaces.

The recommendations focus on different areas depending on the subject matter, but remain centred on the common triad of protection, empowerment and participation. The development of child-friendly online services can, for example, combine safe design, the acquisition of skills and access to age-appropriate content. In contrast, advising families on how to manage screen time during the early years of a child's life focuses on protecting children during a particularly sensitive stage of their development, whilst at the same time helping parents to feel more confident in their approach. Whether a measure is effective is therefore determined not only by the degree of protection it offers, but also by whether it enables independence and safeguards participation.

2.2 Building on proven methods, enabling scalability, and strengthening implementation

The digital world is changing rapidly. However, this does not mean that new programmes or institutions have to be established to meet every challenge. In many areas, there are already well-established responsibilities, tried-and-tested services and professionally recognised approaches. These include, for example, early intervention services, educational child and youth protection, school social work, police prevention work, counselling centres, mechanisms for health promotion and prevention – including screening tests – as well as a wide range of creative and impact-oriented programmes and projects designed to promote media literacy in the field of extracurricular education for children and young people, which also incorporate analogue alternatives. A key principle underlying the recommendations is therefore to make systematic use of existing approaches, to develop them further and to strengthen them where they have not yet been able to reach their target groups reliably.

Scaling up successful approaches must not be equated with a systematic application. Any approach that proves successful in one context must be analysed in terms of its effective components and adapted to different institutional, regional and social conditions. Good practice only becomes a robust framework once quality requirements and obligations have been clarified, staff have been trained, responsibilities have been established and experience is continuously evaluated. As well as expanding geographically, scaling up can also mean making a temporary project permanent, opening up existing services to further target groups, or adapting knowledge so that it can be used in other fields of work.

From the expert commission's point of view, continuity is of particular importance. Short-term project funding can facilitate innovation and help to test new approaches. However, it is no substitute for lasting infrastructure. A focus on one-off, short-term projects ties up specialist staff, leads to loss of oversight, and means that networks and partnerships have to be rebuilt time and again. Where measures have been shown to be effective and fulfil a lasting purpose, they should therefore be incorporated into clear lines of responsibility and

long-term structures. This provides continuity for children, young people and families, and enables financial and human resources to be used more sustainably.

Effective implementation also depends on ensuring that people are made aware of, and have access to, the information and help available. The sheer number of services available makes it difficult for children and young people, parents and professionals to get a clear overview. Information and services tailored to specific target groups, low-threshold access, guidance on navigating the system, and reliable advice on which organisation can provide support for which issue are therefore themselves part of an effective framework of protection and empowerment. New instruments remain necessary where there are genuine gaps. However, they should be integrated into existing systems and should not create additional parallel structures simply for the sake of visibility.

2.3 Trust and flexibility for those ready and available to help

Effective implementation takes place where children and young people live, learn and receive support. School management teams and teaching staff, professionals in childcare centres and home-based childcare, teams working within the various child and youth support services, counselling centres and other local stakeholders are familiar with the composition of their target groups, the pressures they face and the available support networks. The recommendations therefore deliberately place a high degree of trust in their professional judgement. Local stakeholders need the flexibility to adapt resources, models and educational approaches to specific needs.

However, trust does not mean either abandoning fixed goals or shifting government responsibility onto individual institutions. Creative freedom can only be put to good use if responsibilities are clearly defined, professional standards provide guidance, and counselling, further training and specialist support are available to deal with complex issues. The overarching framework must be reliable. Within this framework, practical implementation should not be hampered by unnecessarily rigid and overly detailed objectives.

This also includes having realistic expectations regarding the capacity of the institutions. Schools, in particular, cannot continually take on additional social responsibilities without taking the necessary time, skills and staff resources into account, or without relieving the pressure elsewhere. Flexibility therefore involves setting priorities, discontinuing projects that are less effective or no longer appropriate, and shifting the focus when needs change. Trust in local stakeholders is essential if limited resources are to be allocated where they will have the greatest impact.

In terms of pupils' engagement with media, this could mean, for example, placing greater emphasis on resilience and support in the face of stressful experiences, appointing a contact person qualified in media education, or embedding media education into everyday school life through strengthened school social work. It is not possible to determine entirely from a central level which combination will work in practice.

It is crucial that organisations be able to take action, receive specialist support and channel their experiences back into the further development of overarching strategies.

2.4 A sense of shared responsibility and a tailored approach to families

Shared responsibility is key to ensuring that children enjoy a healthy and positive upbringing in a media-driven and digitalised world. This is based on the principle that roles and responsibilities are clearly defined in order to avoid a diffusion of responsibility. Legislation and regulatory bodies, the police, educational institutions, child and youth welfare services, health and support systems, as well as parents and other caregivers, each have different responsibilities and different options for action. It is important here to clearly define who bears primary responsibility for individual tasks and to organise cooperation at the points where responsibilities overlap in a structured manner.

Educational measures and the regulation of digital services are not mutually exclusive. Media literacy can empower children and young people, but it cannot fully compensate for product design that increases risks, inadequate safety measures or a lack of enforcement. Conversely, technical and regulatory safeguards are no substitute for reliable support, education, counselling and assistance. Structural risks should be prevented from being passed further down the chain – whether it be to children and young people, who are expected to rely on their own skills of competence to protect themselves, or to parents, who are expected to manage complex technical and economic systems on their own in their everyday private lives.

Parents bear a key responsibility for raising and supporting their children. However, families differ considerably in terms of their time, financial, linguistic and social circumstances, their digital experiences and the support services available to them. Recommendations aimed at parents must take these differences into account. Contextual sensitivity means structuring support in such a way that different families can actually understand, access and make use of it.

This includes inclusive, multilingual and accessible information, easy access to counselling, and services that are tailored to specific everyday situations and circumstances. Parenting education should provide guidance and give caregivers the confidence to take action, without moralising or making them feel like a failure for feeling overwhelmed. It is particularly important to reach families who do not seek out existing services of their own accord or who rarely have access to information campaigns. A community of responsibility proves itself effective precisely because support does not merely reach places where there is already sufficient knowledge, time and institutional trust, but also actively seeks out those in need when required.

2.5 Strengthening effectiveness: Co-ordinated protection of children and young people

Numerous measures that are sound from a technical point of view have only a limited impact because responsibilities at points of interface are unclear, or the joint management of these

interfaces is not working effectively, services are not sufficiently coordinated, or parallel structures have emerged. The Commission's consultations and hearings have repeatedly shown that, in many areas, the problem is not so much a lack of sound concepts as a lack of reliable implementation and enforceability. This applies to cooperation at the local level as well as to coordination between the federal government, the federal states and local authorities, the exchange between practitioners and academics, and coordination between different regulatory bodies.

Problems arise when information cannot be shared, differing standards make cooperation difficult, points of contact are unknown, or responsibilities meet institutional constraints. For children, young people and families, this manifests itself in a lack of clear lines of responsibility, unclear access to services and gaps in the chains of support and assistance. For specialists in the field, this means additional work involved in coordinating and the loss of valuable knowledge. Overcoming such problems when it comes to coordinating and integrating policies is therefore not a secondary administrative task, but a key prerequisite for the effective protection of children and young people in the digital world – which is why reducing these inefficiencies should be a top priority.

Depending on the area of action, common standards, clear procedures, compatible technical solutions, reliable structures for cooperation, as well as ongoing training and quality improvement are required. Overarching coordination should not result in an additional level that serves no practical purpose. Their role is to provide guidance, share knowledge, facilitate the exchange of information between different levels, and ensure that feedback from the field is utilised for further development.

Better coordination between the various stakeholders can make more effective use of existing resources and avoid the unnecessary overlapping of structures. However, it does not replace the staffing and financial resources required for long-term tasks. Particularly in the context of debates on reform and spending cuts, the call for efficiency must not lead to additional tasks being shifted to lower levels of government without the corresponding capacity to act. The recommendation for a standardised data format and a shared data pool to combat depictions of sexualised violence, for example, illustrates just how the direct sharing of principles can improve effectiveness. Where relevant departments can exchange and process information in accordance with standardised rules, collaboration becomes faster and more reliable, and is easier to monitor. At the same time, common standards require additional effort, particularly at the outset whilst they are being developed and tested, in order to ensure their long-term viability.

After all, the successful implementation of solutions requires a learning-based approach. Measures should not be regarded as complete once they have been introduced. Monitoring, evaluation and structured dialogue between those affected, practitioners, academia and the relevant institutions make it possible to identify undesirable trends, strengthen effective approaches and adapt recommendations to new technical and societal developments, thereby ensuring that the guidelines remain relevant and dynamic.

2.6 Acting with foresight: Embracing the challenges of AI

Since becoming widely available at the end of 2022, generative AI systems have quickly become an integral part of everyday life. By 2026, they will be used by people of all ages – in families, educational institutions, administration and businesses, and increasingly by children and young people themselves. Artificial intelligence is therefore changing the way we search for information, create content, make decisions, and communicate.

The use of AI systems is already subject to the provisions of the European AI Regulation and other legal provisions. Particularly in sectors where AI is used professionally – such as education, counselling, child and youth services, or healthcare – professionals need sufficient AI skills to support young people in using these technologies responsibly.

Unlike previous digital tools, generative AI is not limited to sorting information or displaying content. It independently generates text, images, videos or suggestions for action, and engages in a dialogue with users. Children and young people may easily come to regard AI systems as trustworthy conversational partners and sources of guidance. This gives rise to new challenges. In addition to potential misinformation and manipulation, there is a risk of emotional attachments, problematic dependencies and inappropriate behaviour. At the same time, AI opens up significant opportunities for personalised education (e.g. in the form of intelligent tutors), individual support, creative processes and easily accessible counselling services. In this context, where opportunities and risks coexist, considerations regarding the protection of children and young people must take into account AI developments as a cross-cutting issue.

The Commission therefore addresses the opportunities and risks of artificial intelligence in numerous sections of this report. Some recommendations for action are specifically aimed at particular AI applications. Furthermore, AI is included as a cross-cutting issue in many other recommendations, as it already permeates numerous areas of our digital daily lives. To highlight this, the AI icon denotes all recommendations where AI is particularly relevant.

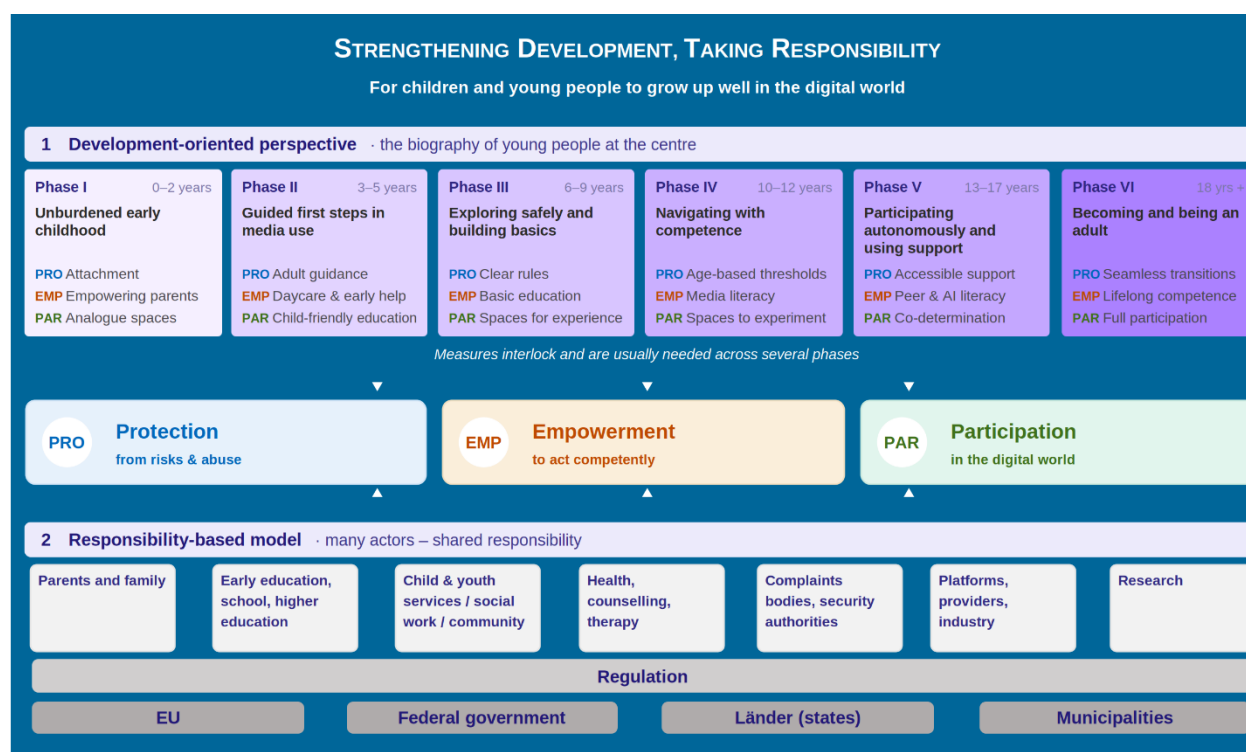
The Commission is aware that the rapid pace of development in the field of AI requires particular attention. In such a dynamic field, recommendations can quickly become outdated, so all stakeholders are called upon to analyse developments on an ongoing basis and assess whether further measures are required to protect children and young people.

2.7 Two perspectives on the recommendations

This basic understanding gives rise to two complementary perspectives on the list of recommended actions. They classify the same object from different perspectives and answer two key questions: (1) What do children and young people need at the various stages of their upbringing? (2) Who is responsible for creating the necessary conditions? Both perspectives are necessary because a purely institutional framework fails to adequately reflect the realities of young people's lives, whilst an exclusively development-focused approach leaves open the question of which actors must take responsibility and take action.

The development-oriented perspective in Chapter 3 focuses on the life story of the adolescent. It categorises the recommendations into six life stages, from early childhood through to the transition to young adulthood, and highlights how needs for protection, abilities and forms of participation change. The recommendations are deliberately presented in a concise manner and organised according to the three principles of protection, empowerment and participation. Measures that have an effect across several stages of life or regardless of age are identified as ‘cross-stage’.

Figure 2: Diagram: ‘Strengthening development, taking responsibility’



By contrast, the responsibility-based model in Chapter 4 focuses on the actors involved and the institutional levels. Each recommendation is assigned to the stakeholder bearing primary responsibility for its implementation – ranging from children and young people themselves, parents and educational institutions, through child and youth welfare services, the health industry and public safety authorities, to platforms, legislation, regulation, oversight and research. Assigning primary responsibility does not preclude cooperation; rather, it is what makes such cooperation necessary. Other organisations involved and people in formal positions of responsibility remain clearly identified, so that there is no question as to who is responsible.

The two models complement each other. The development-oriented perspective shows when and in what context a measure is significant for children and young people. The responsibility-based model outlines who is responsible for designing, funding, implementing or enforcing the measure. Together, they form the framework within which the recommendations for action are set out and explored in detail below. This chapter provides the interpretative framework for this: Children’s rights are the benchmark; their realisation is the goal; and responsibility must be organised in such a way that protection, empowerment and participation work together in everyday life.

The diagram 'Strengthening development, taking responsibility' can also be found in a larger format in [Appendix B](#).

3. A development-oriented perspective – from birth to early adulthood

The development- and life-stage-oriented model follows the life stories of children and young people. It does not focus primarily on institutions or individual media outlets, but rather on what young people need at a particular stage of their lives in order to develop the skills of confidence, competence and independence in a digitally shaped world. This brings developmental tasks and transitions to the fore: Attachment and early self-regulation, starting in nurseries and school, growing independence, the importance of peers, and finally the transition to adulthood.

The six phases are not strictly defined. Developmental processes during childhood and adolescence vary from one individual to another; the social environment in which children grow up, any disabilities, psychological stress or other vulnerabilities all have an impact on these processes. The recommended measures should therefore be introduced at an early stage, build on one another and not be interrupted at points of transition. The aim is to do as much justice as possible to the diversity of the first two decades of development.

Recommendations for action often have an impact across several phases. For each phase, this chapter briefly outlines what young people need and categorises the recommendations according to the three pillars of protection, empowerment and participation.

A detailed description of the recommended actions and the respective responsible parties is provided in Chapter 4. In addition, all recommendations for action are listed in [Appendix A](#).

3.1 Phase I | 0–2 years: A safe early childhood

The early years of life are shaped primarily by reliable relationships and bonds, physical closeness, language, movement and first-hand experiences. Digital media first become significant to a child through the adults in their life: through the attention they give the child, the use of screens in everyday family life, and the way they handle the child's images and data.

At this stage, the focus is not on the child, but on the parents, who need guidance at an early stage and the confidence to take action. As families play a key role during this phase, the recommendations focus on creating trusting environments surrounding birth and early childhood.

- [**RA 2:** Provide reliable counselling and support to families before the child is born and during the first few months of their child's life](#)
- [**RA 28:** Take an approach to media education and health that sees both as two mutually inclusive concepts](#)
- [**RA 5:** Design inclusive parental counselling and education: practical for everyday use, multilingual and accessible](#)

3.2 Phase II | 3–5 years: Guided early media literacy

Between the ages of three and five, children's curiosity about digital devices and content increases. Children begin to actively explore media, but are not yet able to assess its effects, intended purpose and risks for themselves. Children's first attempts to engage with media therefore require the presence of parents or guardians, or early childcare professionals in nurseries, to provide guidance, support and boundaries. This support should be based on play, language, creativity, children's needs and shared discovery, rather than on encouraging independent use as early as possible.

Early intervention services and nurseries reach children and families at this stage in a way that is closely integrated into their everyday lives. They can help to bridge differences in family circumstances, involve parents and encourage self-regulation. Child-focused education thus combines children's first digital experiences with secure relationships and a wide range of non-digital environments.

- [RA 8: Incorporate media education in education and training programmes in the early stages of childhood](#)
- [RA 17: Instil Media literacy and exercise prevention at the earliest stages: harness the potential of early intervention and childcare centres](#)
- [RA 11: Strengthen self-regulation skills within the family, at childcare centres and at school](#)
- [RA 49: Industry certification for toys: Develop 'child-safe AI' alongside an information campaign](#)

3.3 Phase III | 6–9 years: Safe exploration and learning the basics

Starting school broadens children's social and media horizons. Children are making increasing use of digital resources both in the classroom and outside school, and are thus encountering rules, devices and learning platforms in a variety of contexts. At this stage, it is important to lay a solid foundation through age-appropriate activities. When using digital applications, children should understand how they work, grasp the rules, be aware of their own limits and know who to turn to if they encounter problems.

Primary school provides a shared space where educators can introduce children to this topic while tackling inequality. Inclusive participation requires far more than just technical equipment and hardware. It requires qualified teachers and specialist staff, a clear framework, and spaces for learning, recreational and socialising, where safe digital and analogue experiences complement one another effectively. During this phase, the foundations are laid upon which increasing digital and analogue independence is built. In addition, elementary school fosters children's self-regulatory skills.

- [RA 9: Establish media education as a compulsory component of degree programmes and training courses in education and social work](#)

- [**RA 18:** Promote alternative recreational activities and voluntary work](#)
- [**RA 10:** Strengthen digital education in elementary schools – make the most of general studies and afternoon sessions](#)
- [**RA 16:** Regulate the private use of digital devices in schools](#)
- [**RA 12:** ‘AI Seahorses’ – Promote a basic understanding of AI](#)
- [**RA 23:** Expand media literacy in schools by reinforcing school social work](#)

3.4 Phase IV | 10–12 years: Navigating the digital world with confidence

During the transition from childhood to adolescence, young people increasingly navigate the digital world independently. Personal devices and a growing interest in communicating and exploring digital worlds are creating new needs, whilst children’s judgement and self-regulation skills are still developing. Children and young people therefore need age-appropriate services that minimise risks without completely excluding them from digital spaces.

At the same time, this phase is important for the initial development of risk, media and democratic literacy. Supervised testing environments make it possible to identify problematic content, social dynamics and manipulative practices, and to develop counter-strategies. In this context, empowerment does not mean shifting responsibility onto children, but rather enabling them, within a secure environment, to develop their skills and opening up increasing scope for action.

- [**RA 27:** Expand a tiered approach to universal, selective and targeted preventive measures against excessive use and addiction](#)
- [**RA 20:** Create safer spaces for young people to help them recognise online phenomena and develop strategies for dealing with them](#)
- [**RA 19:** Integrate media literacy and democratic education](#)
- [**RA 14:** Identify a contact person with expertise in media education to deal with media-related issues raised by pupils](#)
- [**RA 22:** Strengthen media literacy in the context of child and youth protection in education](#)
- [**RA 24:** Make the use of age ratings for games, etc., more flexible, for example in youth welfare services](#)
- [**RA 47:** Expand and further develop online services suitable for children](#)
- [**RA 48:** Develop child-friendly AI as part of the EU’s digital sovereignty](#)

3.5 Phase V | 13–17 years: Participating on one's own terms and making use of support

During adolescence, digital spaces are closely linked to friendships, the development of identity, education, political information and social participation. Young people are increasingly distancing themselves from their parents and turning to their peers. They are building their networks, increasingly making their own decisions, and rightly expect their views to be taken into account. That is why it is particularly important to provide young people with safe digital environments during this stage of their lives, where they can flourish. In this regard, it is particularly the responsibility of providers of platforms, digital tools and content to ensure that their content is safe for young people. Protection and support services remain essential at all times, particularly for young people who find themselves in vulnerable circumstances, as well as in cases of abuse and when faced with psychological distress, manipulative practices and unlawful content.

The key task at this stage of development is to combine self-determination with accessible support. Young people need age-appropriate activities, clear guidance, competent and trustworthy people to turn to, and knowledge about algorithms and artificial intelligence. As we get older and enjoy greater freedom, we also take on more responsibility. That is why an understanding of the limits of the law (including criminal law-) and a sense of responsibility for one's own actions are crucial at this stage of life. Peer-based approaches and active participation boost self-efficacy because they draw on experiences from young people's own lives and treat them not only as recipients but also as active contributors.

- [RA 29: Strengthen and make support services for children and young people more accessible](#)
- [RA 13: Promote algorithm and AI literacy in an educational context](#)
- [RA 15: Strengthen media literacy in lower and upper secondary education through \(peer-to-peer\) programmes](#)

3.6 Phase VI | 18 years +: Growing up and coming of age

Reaching the age of consent does not mean that the need for protection or the learning process come to an abrupt end. This phase does not contain any specific recommendation from the expert commission. Rather, it has to make clear that the measures taken in the previous stages of development are having a lasting effect and that the young adults are becoming competent and confident users of digital services. Transitions, for example from youth support services or school-based support systems, should be seamless, and there should be no expiry date on support services. Developing media literacy remains a lifelong endeavour, and participation now means playing a full and equal part in digital life. At the same time, full legal participation requires young adults to understand digital technologies, make sense of decisions, exercise their rights and behave responsibly in the digital space. It's a perpetual process: Today's young adults will themselves one day be looking after children,

who, in turn, will see them as role models – and will thus find themselves facing the very same challenges posed by the early stages of life.

3.7 Tasks spanning across different phases

Many recommendations for action focus primarily, but not exclusively, on a single stage of life. Age-appropriate support can only be effective if digital services are designed to be secure, rights are upheld, support is accessible and decisions are based on reliable evidence. Platform management, regulation, law enforcement, healthcare, critical infrastructure, oversight and research therefore form a framework that informs the entire course of one's life.

These tasks that span across different stages ensure that protection does not depend solely on the attention of individual parents, professionals or young people. They establish reliable standards, responsibilities and resources, which form the basis for age-related measures. The specific details of how this works are set out in the responsibility-based model in the following chapter.

- [RA 1: Launch the national awareness campaign 'For the Sake of Our Children'](#)
- [RA 3: Expand, strengthen and make it easier to find local resources for media literacy programmes](#)
- [RA 4: Raise awareness amongst parents and families about the responsible use of images of children and young people online](#)
- [RA 6: Facilitate discussion amongst parents on media education – Ensure the continuity of effective projects](#)
- [RA 7: The legal framework for parental guidance on media use under family law \(Section 1631 of the German Civil Code \(BGB\), Section 1626 of the German Civil Code \(BGB\)\)](#)
- [RA 21: Centralise and make age- and development-specific approaches to promoting media and digital literacy accessible](#)
- [RA 25: Develop a tiered prevention system with more tailored support for vulnerable children and young people](#)
- [RA 26: Introduce uniform standards for the diagnosis and treatment of behavioural addictions and addictive behaviour](#)
- [RA 30: Provide easy access to medical and psychological support for digital stress](#)
- [RA 31: Strengthen digital policing](#)
- [RA 32: Children's Online Helpline – establish a nationwide reporting and information centre for public safety authorities dealing with minors](#)
- [RA 33: Consistently combat depictions of sexual violence](#)

- **RA 34:** Combat digital sexual offences through police sting operations involving child actors
- **RA 35:** Develop standardised criteria and data-sharing practices for the depiction of sexual violence
- **RA 36:** Risk- and work-based regulation – two alternatives: a statutory minimum age limit (13 years) and job-specific age limits
- **RA 37:** Secure and age-appropriate default settings and design requirements for young people's accounts – ensure child protection 'by design' and 'by default'
- **RA 38:** Establish binding rules for effective and data-protection-compliant age assessment whilst safeguarding fundamental rights
- **RA 39:** Ensure users have greater control over recommendation systems and content
- **RA 40:** Close existing security gaps in the DSA: Amendments to the regulations for small and micro-enterprises
- **RA 41:** Protect children's privacy – warnings from service providers regarding the uploading of photos of children
- **RA 42:** Handle children's photographs responsibly within public institutions
- **RA 43:** Impact on children and families: Empower parents in their role as guardians and establish a binding framework
- **RA 44:** Extend the scope of usage risks in the JuSchG and JMStV to cover AI-related issues
- **RA 45:** Improve protection against malicious deepfakes and deepnudes
- **RA 46:** Risks posed by AI companions: Introduce an age limit as an urgent measure
- **RA 50:** Create incentives for trustworthy European platform and data infrastructures
- **RA 51:** Conduct a scientific review of political demands regarding DSA liability
- **RA 52:** Promote research into how children and young people engage with the media
- **RA 53:** Launch a research initiative into the mechanisms of action in social media and AI applications
- **RA 54:** Establish structured participation of children and young people in digital child and youth protection
- **RA 55:** Establish and maintain an interdisciplinary panel of experts to analyse and assess current developments in the protection of children and young people in the media
- **RA 56:** From knowledge to action: Set out an implementation strategy for the digital protection of children and young people

4. Responsibility-based model – Who needs to take action?

The responsibility-based model translates the needs of children and young people, as described throughout the course of their lives, into specific actions to be taken. It assigns each recommendation to the stakeholders who can and must play a decisive role in shaping, financing, implementing or enforcing the relevant conditions. In this context, shared responsibility does not mean that everyone is equally responsible for everything. Rather, it requires clear primary responsibilities whilst also highlighting where cooperation is needed.

In the development-oriented model, families are mentioned first because parents and close caregivers support children from the very beginning, notice changes at an early stage and are often the first people to turn to when problems arise. Article 6 of the Basic Law protects the rights of parents and, at the same time, assigns them the responsibility for the care and upbringing of their children. At the same time, it attributes a specific responsibility for protection and guarantee to the government. The state should therefore create a framework that supports families in their parenting responsibilities, effectively protects children and young people, and prevents the systemic risks of the digital space from being passed on to individual families.

Children and young people have rights of their own. They should be involved in decision-making and, as they get older, gradually take on more responsibility for themselves and their actions. Parents, schools, youth welfare services and counselling centres guide and support them in this process. However, they cannot compensate for a lack of staff and time, nor for shortcomings in product design, regulation, supervision or infrastructure. Support can only be effective if suitable services are available, accessible and have a reliable source of funding.

The responsibility-based model therefore highlights the different courses of action and areas of responsibility within the family, education, youth welfare, healthcare, public safety authorities, business, regulatory bodies, politics and research.

The order in which the parties are listed does not reflect a hierarchy of their responsibilities. The recommendations are categorised according to who bears primary responsibility for the measure in question. Many measures involve several stakeholders and only have an impact when they work together. The information on responsibilities and the development phase links this institutional perspective with the development-oriented model described in Chapter 3.

4.1 Parents and family

Parents and other family members provide the immediate framework for children's engagement with the media. Their role is to provide guidance, act as role models, set age-appropriate boundaries, support their children in their digital experiences and help them develop their skills. In the early years, they also decide which devices, content and services their children have access to, and how to use technical parental control settings. However, this responsibility must not be confused with personal responsibility. Parental education programmes and the actions of individual families cannot replace effective regulation and law enforcement, nor can they replace safe digital products and reliable protective frameworks.

Families need clear and helpful guidance, reliable information, easily accessible counselling and (tailored) support services, as well as structural and technical solutions that actually ease their burden in everyday life. Media education takes place under a wide variety of temporal, social, financial and linguistic conditions. Support should therefore begin at an early stage, be relevant to everyday life, accessible and tailored to people's circumstances, and help them feel confident in taking action.

Digital media can make everyday life easier for families and can be put to good use in certain situations. However, their use becomes problematic when they are regularly used to suppress children's needs for attention, physical activity, interaction or shared activities.

This is by no means about taking a patronising approach towards parents. The use of digital devices often arises as a result of time pressure, exhaustion, a lack of childcare provision, cramped living conditions or social expectations that children should be as quiet and unobtrusive as possible. A child-friendly society therefore does not focus solely on the behaviour of individual families. It creates an environment in which children and young people are visible, heard and welcomed, with their needs taken into account.

HE 1 Launch the national awareness campaign 'For the Sake of Our Children'

Problem

Minors gain access to the digital world at a very early age. It is therefore the parents' responsibility to provide the initial preparation and support. However, they can only properly support their children as they grow up in the digital age if they themselves have a good understanding of the possibilities, the legal framework and the risks involved. However, many parents feel overwhelmed by technological developments, and there has thus far been a lack of provision of structured digital education for this generation of parents.

Recommendation

A long-term national campaign to spread information and raise awareness is intended to strengthen digital literacy amongst adults. It is to be rolled out across the board in both analogue and digital spaces and will include regular clips to raise awareness as well as analogue measures, all linked by a common theme. The aim is to encourage platform operators and influencers to get involved. The campaign is a key component of easily accessible, universal prevention.

The federal government, the federal states, local authorities and independent organisations are involved.

Effect

Parents and caregivers recognise digital risks at an early stage, remain approachable and provide their children with effective guidance in the digital world. Improved digital literacy amongst adults is becoming a reliable foundation for child protection.



HE 2 **Provide reliable counselling and support to families before the child is born and during the first few months of the child's life**

Problem

If digital media are used to soothe and entertain children from a very young age, this carries risks such as sensory overload, an early dependence on being rewarded through media use, and reduced parental attention. Intensive media use by parents, involving long periods spent in front of screens, parental distraction and 'phubbing' or 'technoference' (the disruption of face-to-face conversations caused by attention being diverted to a digital device), carries developmental risks. There is a lack of compulsory counselling that reaches every family at this early stage.

Recommendation

Parents should be provided with reliable information and counselling, both before and after the child is born, on how to manage their children's use of digital media during the first three years of their lives. The focus should be on raising awareness of the consequences of one's own media use, the potential consequences of children's media use, and alternative forms of activity. It should be provided both before and after the child is born through trusted support networks such as midwives, paediatricians, early intervention services and childcare centres, supplemented by outreach services. The counselling service must be equipped with competent staff and the necessary qualifications.

The parties involved are the federal states, healthcare funding bodies and educational institutions.

Effect

Screen time during the early years of life is reduced as much as possible. Parents reflect on their own media behaviour in the presence of young children and are empowered to protect their children from negative consequences.



HE 3 Expand, strengthen and raise the profile of local organisations offering media literacy programmes

Problem

Programmes designed to promote media literacy are distributed very unevenly across different regions. Parents, childcare professionals, teachers, as well as children and young people, often do not know where to find support, counselling and training in their local area. Easily accessible services close to home, in particular, remain important, but are lacking in many regions or are very difficult to find.

Recommendation

Existing support services in towns and municipalities (e.g. municipal media centres, counselling centres) as well as networking initiatives for local partnerships (e.g. the 'Growing Up Safely with Media' initiative) are based on the idea of providing easily accessible and needs-based support for parents, educational staff, children and young people. Existing points of contact should be equipped to coordinate local media education programmes and services, ensure quality and provide guidance. In regions, towns and municipalities where no such services are currently available, support should be provided for their establishment and expansion. A nationwide digital map is intended to make it easy to find local support centres by entering a postcode or city.

The federal government, the federal states and local authorities should identify existing services, reinforce them with a focus on quality, and tailor them to the needs of both rural and urban areas.

Effect

Families and professionals can quickly and reliably find local support through a well-balanced combination of in-person and digital services. This helps to build trust and a sense of security, and to promote digital participation among children and young people.



HE 4 Raise awareness amongst parents and families about the responsible use of images of children and young people online

Problem

Sharing photos, videos and voice recordings of children on social media ('sharenting') is part of everyday life for many families. However, such content is often published without the children and young people concerned having the capacity to give consent, and contains personal contextual information that allows conclusions to be drawn about their identity and life circumstances. Younger children, in particular, are unable to fully grasp the long-term consequences of such posts – such as the fact that they can be found indefinitely, may be shared further, misused or used by third parties at a later date. Particularly problematic are depictions that show children in private, intimate contexts or in emotional and vulnerable situations. The publication of images and videos without taking into account the capacity of the individuals concerned to give consent violates their right to privacy and informational self-determination, and increases the risk of uncontrolled dissemination or misuse. Generative AI exacerbates this risk, as images and videos can be manipulated even more easily and used to train AI systems.

Recommendation for action

Parents and families should, in addition to [HE 41 'Protect children's privacy – warnings from service providers regarding the uploading of photos of children'](#) and [HE 43 'Child/family influencing'](#): Empower parents in their role as guardians, establish a clear framework, and raise awareness specifically about the risks of sharenting, as well as the rights of children and young people to privacy, data protection and participation. Existing information services should be expanded and supplemented with further services that are easily accessible.

The organisations involved include the federal states, local authorities and educational institutions, as well as state agencies for the protection of children and young people and the highest state authorities for family and youth affairs.

Effect

Greater awareness encourages a more mindful approach to the publication of images and videos, as well as respect for the rights and interests of children and young people in the digital space. This helps to protect their privacy and their right to self-determination when it comes to the information they receive. In the long term, this will raise awareness of the rights of children and young people in the digital world.



HE 5 Design inclusive parental counselling and education: practical for everyday use, multilingual and accessible

Problem

Regional variations in the range of educational and support services available, the often difficult-to-understand language used in information leaflets, multilingualism within families, and time constraints arising from, for example, shift work and night work, mean that existing information services do not reach parents in their day-to-day lives.

Recommendation

Counselling and educational services for parents in the field of digital media should be designed to be inclusive, culturally sensitive and free from discrimination. Multilingualism, including simplified language and, where appropriate, sign language, as well as audiovisual and flexible formats, should be taken into account so that families in rural areas and those with limited time can be reached. The aim is to build on existing initiatives such as *clicksafe*, *FLIMMO* and *PAY ATTENTION!* The aim is to analyse empirical findings on the design and impact of digital and multilingual parent education programmes. Public places such as paediatric practices and supermarkets, as well as parent influencers, are to be used for advertising and raising awareness.

The federal government, the federal states, local authorities and educational institutions are all involved.

Effect

An easily accessible, welcoming and comprehensive range of services reaches groups of parents who have previously been under-represented and increases their participation. Children and young people benefit from their parents receiving tailored counselling and support.



HE 6 Facilitate discussion amongst parents on media education – ensure the continuity of effective projects

Problem

Parents are faced with an ever-changing digital environment and the challenges that come with it. In order to fulfil their responsibilities in the area of media education, parents need reliable points of contact, but also places where they can exchange ideas with one another. Unlike when dealing with doctors and educational professionals, parents are not dealing here with institutions whose authority can sometimes be intimidating; instead, they engage in everyday, peer-to-peer exchanges with other parents, ask questions, discuss challenges and benefit from the experiences of other families.

Recommendation

Counselling and formats for the exchange of information are to be (further) developed as part of services provided under Section 16(2)(1) of Book VIII of the Social Code (SGB VIII) within the jurisdiction of local authorities, and/or existing successful projects at state level are to be expanded. The ‘Parent Talk’ project appears particularly promising; it is already being implemented in several federal states: in Bavaria since 2001, in Lower Saxony since 2012, in North Rhine-Westphalia since 2016 and in Baden-Württemberg since 2024.

Responsibility for this task lies with the federal states and the local youth welfare offices, state youth welfare offices, state agencies for the protection of children and young people, and the highest state authorities for family and youth affairs.

Effect

In open-ended discussion groups led by experts, parents find a forum for respectful dialogue and practical information on issues relating to children’s media use, the protection of children and young people online, and their own media behaviour. These discussion groups offer a professionally sound alternative to parenting blogs and the use of AI in relation to parenting issues. These everyday, accessible and, where necessary, multilingual discussion formats also reach parents who are otherwise difficult to engage with through institutionalised forms of parental education, thereby helping to counteract social inequality in media education.



HE 7 The legal framework for parental guidance on media use under family law (Section 1631 of the German Civil Code (BGB), Section 1626 of the German Civil Code (BGB))

Problem

Children and young people are growing up in digitalised environments, yet civil law and the law governing the care of minors have so far only taken digital development and protection risks into account indirectly. New risks, such as digital neglect, are difficult to categorise clearly from a legal perspective.

Recommendation

As with the introduction of non-violent parenting in 2000, following extensive debate, the legislature is set to extend the child's right to care and upbringing, as set out in Section 1631(2) of the BGB (German Civil Code), to include neglect, including digital neglect. It is proposed that Section 1626(2) of the German Civil Code (BGB) be amended to specify that the child's developing abilities and needs must also be taken into account in the digital sphere. A new Section 1631f of the German Civil Code (BGB) could provide a framework for parental responsibility in digital education. Campaigns and accompanying research are intended to reinforce this.

This is a matter for the federal government.

Effect

Parents, youth welfare services and family courts are provided with clear guidance on responsible media education that is appropriate to children's developmental stages. As with the right to a non-violent upbringing, this standard has a symbolic and behavioural impact that extends throughout society and to platform providers, and protects children from serious digital neglect.



4.2 Early education, school, vocational training and higher education

Early education centres and schools support young people and reach almost all children and young people. They are therefore key institutions for building fundamental media and AI literacy, levelling the playing field for children and young people with different backgrounds, and creating safe spaces for learning and socialising. Their role is not limited to the use of digital devices, but primarily involves understanding the mechanisms and interrelationships at play, the ability to exercise sound judgement, self-regulation, and providing support during stressful experiences.

To ensure that this task is carried out successfully, early child education professionals and teachers require compulsory training. Universities and training institutions have a responsibility to prepare future skilled educators. Clear rules, qualified points of contact, peer-based approaches and stronger school social work should come together to form a reliable overall strategy, without overburdening schools with additional tasks.

RA 8 Make media education a mandatory component of the initial and continuing professional development of early education professionals

Problem

Early childhood educators support children and their families as educational partners during the early years of a child's development. In all federal states, media education – and, in some cases, the promotion of media literacy – is enshrined as a key priority within the educational curriculum of early childhood care. Principles for early childhood education (referred to as 'objectives', 'guidance curricula', 'educational principles' or 'educational plans', depending on the federal state) are in place and/or are currently being revised. To date, there has been no widespread integration of this into the training programmes for educational professionals.

Recommendation

Digital media literacy – including artificial intelligence – should become an integral part of early education. Media education should be established as a compulsory module, which counts towards final assessment, within training and degree programmes, and should be legally enshrined in training and further education curricula as well as in examination regulations. In addition, qualified professionals should take part in further training and professional development programmes.

Responsibility for this task lies with the federal states and local authorities, together with vocational education and training institutions and the organisations providing these services.

Effect

Educational professionals provide guidance to help children develop media literacy safely in their everyday lives and advise parents as part of a partnership in child-rearing. Through regular professional development, they keep pace with developments in the media landscape, ensuring that children learn to engage with media in a mindful way right from the start.



RA 9 Establish media education as a compulsory component of degree programmes and training courses in education and social work

Problem

Teachers and educational staff in schools, youth support services and recreational facilities are often people to whom young people turn for help, including with media-related issues such as disturbing content, unwanted contact or bullying. However, they often lack basic knowledge about the importance of media for young people, about privacy and security settings, and about criminal law issues, so they are unable to provide adequate assistance.

Recommendation

A module on media education – which also covers legal aspects and provides support in the event of distressing media experiences – is to be made a compulsory part of teacher training programmes, in-service teacher training, and all degree and vocational training programmes in the areas of education and social work. For this purpose, a legal framework is to be established; the relevant range of courses at universities and universities of applied sciences is to be expanded and made easily accessible; and these are to be supplemented by certificate courses that can be taken alongside degree programmes.

Responsibility for this task lies with the federal states, in conjunction with the universities and technical colleges.

Effect

Teachers and educational professionals have in-depth knowledge of media use, digital phenomena and online risks, safety and the law, and are therefore competent points of contact. They independently address media-related issues and provide effective support to children and young people who have had traumatic experiences.



RA 10 Reinforce digital education in primary schools – make use of general studies and afternoon sessions

Problem

Children have so far only acquired the basic skills needed to understand their digitalised environment in a haphazard manner. General studies in elementary school, which helps children understand the world around them, provides a suitable framework for this, but is not yet consistently utilised for the development of media and digital literacy skills. The afternoon activities offered by (voluntary) all-day schools, which are being increasingly expanded as part of the statutory entitlement, are not being utilised sufficiently for media education programmes. Such content is not sufficiently integrated into primary school teacher training.

Recommendation

Compulsory content relating to media education and computer science is to be incorporated into general studies in elementary schools by giving greater emphasis to selected aspects of computer science and media literacy in the curricula and teaching plans.

The afternoon should be spent taking part in compulsory or optional activities. As part of the expansion of all-day schooling, multi-professional teams are being trained.

In the process, use should be made of the services offered by initiatives, specialist and advisory centres, public safety authorities, non-governmental organisations, foundations, projects and social start-ups. An overview of tried-and-tested initiatives and resources is to be compiled in a central location. (See [RA 3 'Expand, strengthen and make it easier to find local points of contact for media literacy programmes'](#)).

This is the responsibility of the federal states.

Effect

Media and digital skills are systematically developed as early as elementary school. Children come to understand the basic workings of digital media at an early age and are equipped to navigate a digitalised world confidently, in line with their age and stage of development.



RA 11 Strengthen children's self-regulation skills within the family, in childcare centres and at school

Problem

Many children and young people engage in excessive and, in some cases, addictive use of digital and social media, a trend exacerbated by algorithms that continuously present content designed to keep them hooked. Strong self-regulation skills help to prevent this, but the number of children with underdeveloped self-regulation skills is on the rise, and targeted, systematic support is not yet available everywhere.

Recommendation

Strengthening self-regulation skills should become a priority educational objective during the first ten years of a child's life. It should be promoted from the age of one in childcare centres and later in primary schools, and should be embedded in the framework and guidance plans as well as in school curricula. Parents should be supported through early intervention services, nurseries and schools in fostering their children's self-regulation. Structural resources, as well as the continuing education and training of specialist staff and teaching staff, should be safeguarded.

Responsibility for this task lies with the federal states and local authorities.

Effect

Children are encouraged to develop self-regulation from an early age, thereby building their resilience to excessive and addictive media use. Average usage times are falling significantly, and the development of dependencies is being eliminated.



RA 12 'AI Seahorses' – Promote a basic understanding of AI

Problem

Youth support and educational organisations are increasingly using AI systems such as chatbots. These hold considerable potential, but also entail considerable risks. The EU's AI Regulation requires organisations to familiarise staff, as well as children and young people, with the use of AI. This obligation has not yet been met across the board, and schools and youth welfare services are struggling to implement it on their own.

Recommendation

To fulfil the obligation set out in Article 4 of the AI Regulation, a compulsory 'AI Seahorse' is to be introduced – a child-friendly certificate, available online, covering the opportunities and risks associated with the use of AI, initially aimed at elementary school-age children. The procurement is to be organised and funded through a central start-up service run by the federal government; the subsequent allocation is to be the responsibility of the educational institutions in the federal states. An 'Expert Council on AI and Children' at the federal level is to continuously update the content and advise the federal government.

Responsibility for this task lies with the federal government, the federal states and the local authorities.

Effect

Educational institutions fulfil their legal obligations, and children acquire a basic understanding of AI at an early age that is accessible and easy to grasp. This lays the foundations for a responsible and competent approach to AI, setting an example for the federal government, the federal states, local authorities and the EU.



Problem

Young people use AI applications particularly frequently in a school setting, from carrying out research and writing texts to chatting with chatbots. They usually learn to use these tools on their own, whilst their systematic, methodical use in the classroom is rare. This leads to significant disparities in knowledge and skills, and critical reflection on the opportunities and risks is often lacking.

Recommendation

Subject-specific and cross-curricular educational programmes for lower and upper secondary levels are designed to impart AI literacy and enable pupils to engage with AI in a reflective, critical and responsible manner. The study of algorithmic recommendation systems and AI applications should be embedded in the curricula; the necessary infrastructure should be provided; educationally appropriate AI tools should be used; the subject of computer science should be expanded; and teachers should receive comprehensive continued training.

Responsibility for this task lies with the federal government, the federal states and the local authorities.

Effect

Pupils understand algorithms and AI, assess their potential and limitations, and use tools thoughtfully for learning and in their everyday lives. Differences in skill levels are levelled out, and young people take the lead in shaping how they interact with AI.



RA 14 Identify a contact person with expertise in media education to deal with pupils' media-related enquiries

Problem

When it comes to using the internet and social media, pupils frequently have questions or need to talk to someone, for example about disturbing content, inappropriate contact or cyberbullying. Children often do not see their parents and teachers as competent or suitable people to turn to, partly because they are embarrassed or because they have broken the rules. Those affected are thus left to cope with their problems on their own, with potential consequences for their mental health.

Recommendation

Every school should have at least one member of staff qualified in media education whom pupils can turn to with any distressing media-related concerns. This role should be fulfilled by media education specialists, suitably qualified school social workers (see [RA 23 'Expand media education in schools by strengthening school social work'](#)) or, with the support of an adult supervisor, older pupils acting as media scouts (see [RA 15 'Strengthen media literacy in lower and upper secondary schools through \(peer-to-peer\) programmes'](#)).

Responsibility for this task lies with the federal states and local authorities, as the bodies responsible for running schools.

Effect

Pupils are not left to cope with distressing media experiences on their own; they receive answers and, together with a qualified professional, develop solutions and personal strategies. This helps prevent mental health issues and helps them develop the skills to use media effectively.



RA 15 Strengthen media literacy in lower and upper secondary education through (peer-to-peer) programmes

Problem

The level of media literacy among pupils in lower and upper secondary education varies, and effective, scientifically validated initiatives and programmes do not reach them across the board. In particular, tried-and-tested peer-to-peer approaches, in which older young people mentor younger ones, have so far neither been systematically documented nor disseminated.

Recommendation

Media literacy in lower and upper secondary education is to be enhanced through programmes that have been scientifically evaluated. Particular emphasis is to be placed on peer-to-peer programmes in which teachers or specialist staff are trained to teach older pupils locally. With financial support from the federal government, the federal states should set up a database of programmes and services and ensure that sufficient staff resources are made available within their relevant institutions (see [RA 21 'Centralise and make age- and development-specific approaches to promoting media and digital literacy' accessible](#)). Schools are required to document which programmes they use.

The federal government, the federal states and local authorities are involved.

Effect

In all sixteen countries, pupils are provided with reliable opportunities to develop their media literacy. Tested programmes are gaining ground, and younger teenagers are benefiting from the knowledge and credibility of their older peers.



Problem

The personal use of digital devices in class is a major distraction, hinders a focused learning environment and limits social interaction during breaks. In situations of bullying, they can have a reinforcing effect. The regulations currently vary considerably between countries and types of school.

Recommendation

The aim is to support schools by imposing extensive restrictions on the private use of digital devices. In primary schools and up to and including grade 7, the use of mobile phones for personal purposes during lessons, in extracurricular activities and during break times is to be prohibited nationwide and enshrined in school legislation. From grade 8 onwards, schools are to be required to draw up compulsory plans for usage together with pupils.

This is the responsibility of the federal states.

Effect

This allows pupils to concentrate better and gives them guaranteed access to digital learning resources. Breaks are once again providing opportunities for face-to-face social interaction.



4.3 Child and youth services and social work

Child and youth support services and social work reach young people and families in different life circumstances and situations than general educational programmes. Their strength lies in relationship-building, voluntary work, accessibility and the ability to consider individual, family and social circumstances together. They can combine prevention, counselling, protection and participation, and provide support in particular to vulnerable groups or those who are difficult to reach through institutional channels.

This requires a clear focus on media education, effective and securely funded structures, and professionals who understand digital environments. Early intervention, accessible child and youth work, youth organisations and school social work offer different approaches throughout a person's life. Spaces for experimentation supported by educational guidance, combined with appropriate legal leeway, make it possible not only to avoid risks, but also to discuss and reflect on them together with young people.

RA 17 Media literacy and prevention from an early age: strengthen the potential of early childhood support services and childcare centres

Problem

Early intervention services and childcare centres are key, trustworthy points of contact for families from the child's birth onwards. However, their potential for media education and prevention is not being fully realised. Although digital media literacy is set out in most framework and guidelines, it is not implemented on a mandatory basis in all institutions, meaning that early media literacy is not provided across the board.

Recommendation

The aim is to enhance the potential of early intervention services and childcare centres. Early intervention is intended to pave the way for responsible media use, for example by addressing the issue of baby photos online and counselling on media literacy. In nurseries, media education should be implemented as a mandatory component, expanded in all framework and guidelines, and taken into account in evaluation systems. Structural resources and the training of skilled staff should be safeguarded, and parents should be involved.

Responsibility for this task lies with the federal government, the federal states and local authorities, together with the funding bodies and institutions.

Effect

Media literacy begins in the early stages of life. Even at nursery, all children learn to use resources in a responsible way and develop an initial understanding of risks and self-regulation, which makes them more resilient to excessive or dangerous use later on.



RA 18 Promote alternative forms of recreational activity and volunteering

Problem

There is a general lack of attractive non-digital recreational activities, and these are too rarely integrated in a reliable way with schools and public institutions. This means there is no effective counterbalance to intensive media use that would enable young people to gain experiences, form social bonds and get involved outside the digital sphere.

Recommendation

The federal states should work together, with support from the federal government, to develop and implement programmes that promote in-person recreational activities linked to schools. Volunteering and peer-to-peer programmes should be specifically supported, positive examples publicised, and incentives provided through alternative forms of assessment. Existing institutions, such as clubs, should be expanded and formally integrated with schools and public institutions. The offers are to be advertised publicly. Digital formats may be added.

Implementation and funding are the responsibility of the federal states and local authorities.

Effect

Young people are provided with reliable, real-world environments in which they can develop social skills, form bonds and get involved. This bolsters clubs and voluntary organisations and provides an attractive alternative to media use.



RA 19 Integrate media education and democratic education

Problem

The internet and social media are key sources of political information for young people and, at the same time, spaces in which they form their identities. There, they encounter simplified, increasingly AI-generated narratives, sensationalised appeals to their emotions and targeted disinformation from anti-democratic actors. These strategies are difficult to see through, and they influence the formation of public opinion and people's understanding of democracy.

Recommendation

Media literacy and civic education should be specifically integrated so that young people can recognise anti-democratic narratives and actively engage with them. A nationwide funding programme is intended to develop, test and implement initiatives for schools, youth organisations, clubs and community-based children's and youth work, supported by project consortia comprising practitioners and academic experts. Efforts should be made to establish cooperation with the federal and state centres for political education.

This is a matter for the federal government.

Effect

Young people recognise manipulative online strategies, analyse them and develop their own ways of responding. They develop a fact-based understanding of democracy and a democratic mindset, which they use to participate in society.



RA 20 Establish safer spaces for young people to help them recognise online phenomena and develop strategies for dealing with them

Problem

The internet, social media and online games are key spaces for young people to access information, exchange ideas and form opinions. However, they also encounter disinformation, populist rhetoric and hateful comments there, and – driven by algorithmic recommendations – often find themselves in a bubble where they're fed biased information. In order to develop their own outlook, one that is grounded in democratic values, they lack supported spaces in which they can try out counter-strategies.

Recommendation

Young people should be provided with safer spaces supported by media education, such as workshops, supervised groups or moderated platforms, where they can recognise manipulative behaviour and develop strategies for dealing with it.

To facilitate the development of such safer spaces, pilot projects are to be developed and scientifically monitored nationwide as part of a project funding scheme. Proven projects and services should be certified with a quality seal and made available on a central platform or listed in a central database (see [RA 21: 'Centralise and make age- and development-specific approaches to promoting media and digital literacy accessible'](#)).

Effect

Young people recognise disinformation and manipulation, understand them and counter them effectively. They are able to protect themselves from being manipulated by anti-democratic actors and to participate more effectively in public debates.



RA 21 Centralise and make age- and development-specific approaches to promoting media and digital literacy accessible

Problem

There are many approaches, methods and resources available for promoting media literacy tailored to different ages and stages of development, but they are scattered across numerous organisations and difficult for professionals to locate. This time-consuming search means that programmes are delivered at a lower standard or not delivered at all, and the promotion of media literacy takes a back seat.

Recommendation

The aim is to bring together, in a central location, tried-and-tested concepts, methods and materials, and to create a database of qualified speakers and effective initiatives and projects. This enables institutions and professionals to pool their resources and provide support in a way that takes into account differences in age and developmental stage during the planning and implementation stages. The organisation is to be based at the Federal Agency for Child and Youth Protection in the Media (BzKJ). The design and development are to be outsourced, a quality assurance procedure is to be established, and the database is to be maintained on an ongoing basis.

This is a matter for the federal government.

Effect

High-quality services and qualified specialists are all available in one central location. Building on this, institutions and professionals can more easily develop their own programmes, thereby ensuring that the quality of education on media literacy continues to improve.



Problem

Educational child and youth protection under Section 14 of SGB VIII informs, raises awareness amongst and empowers children, young people and parents or guardians; as a multidisciplinary task within child and youth support, it ranges from child and youth development (youth work, youth and school social work) through to family education, support for children in daycare centres and educational assistance, it is well-suited to reaching broad target groups preventatively and relieving the burden on schools. However, the promotion of media literacy is not explicitly regulated by law in those regions, and the educational protection of children and young people varies from one federal state to another.

Recommendation

The promotion of media literacy should be explicitly included in Section 14 of Book VIII of the Social Code (SGB VIII) as a measure for the educational protection of children and young people. Educational measures to protect children and young people should be expanded to ensure their preventive impact is felt across the board and structured in a way that allows for nationwide comparability. This ensures the ongoing transfer of research findings into practice, as well as continuous expert counselling, for example through central state agencies.

Effect

The promotion of media literacy within child and youth welfare services – as the key area of extracurricular education – is being given a clear legal framework and a reliable structure. Its preventive impact is felt to a similar extent nationwide, reaching a wide range of target groups whilst at the same time supporting schools in their educational objective.



Problem

The school reaches all children and young people of school age and is a key centre for media education. Once the legal entitlement to all-day childcare comes into force, this period will be extended even further for many children.

However, the debate focuses heavily on formal instruction, whilst school social work, as a complementary space for learning, is underutilised. It works by building relationships, fostering trust and providing easily accessible support, particularly for disadvantaged young people and in rural areas, but it is under-resourced.

Recommendation

School social work under Section 13a of Book VIII of the Social Code (SGB VIII) is to be reinforced through a significant increase in resources, so that it can promote media literacy either as a supplement to or in conjunction with lessons.

Possible options include preventative group programmes, peer learning, mediation services such as a ‘social media consultation hour’, and information sessions for parents. At the same time, the aim is to ensure that skilled workers receive long-term training. The aim is to pool and share existing resources and expertise across schools, in cooperation with external partners.

As media literacy is closely linked to the promotion of democracy, the prevention of violence and addiction, protection against abuse, and issues of equality, these topics should not be addressed in isolation but as part of a coordinated approach to prevention and education. For this purpose, school social workers should systematically collaborate with existing specialist and advisory services, public safety authorities, civil society organisations, foundations, projects and social start-ups.

Unlike temporary initiatives, such as workshops in schools, school social work is a permanent framework for prevention (which varies in form from one federal state to another). Strengthening this structural framework would be of particular benefit to rural areas, where media education projects are less widespread. Only a local community network can have a lasting impact here.

Implementation and funding for this task are the responsibility of the federal states, local authorities and funding bodies. The federal government can take action within the framework of existing support programmes, such as the Give Youth a Fighting Chance Programme, expand these programmes or launch supplementary ones.

Effect

As a permanent preventive measure, school social work provides reliable support for young people's use of media, including in rural areas. Pupils find knowledgeable, trustworthy people to turn to, free from the pressure to perform, and this effectively complements media education at school.



RA 24 Make the use of age ratings for games and other content in youth welfare services more flexible

Problem

Since the 2021 amendment to the Youth Protection Act, risks associated with use and interaction have been factored into the age ratings for games. As a result, popular games have been given higher age ratings due to risks such as in-game purchases. In child and youth care facilities with mixed-age groups, such content may no longer be made available to younger children, even though the risks associated with moving them up to a higher age group can be managed there from both an educational and technological perspective.

Recommendation

An 'extended parental privilege' is intended to make the use of age classifications in youth welfare services more flexible. Services that carry a higher age rating due to risks associated with use and interaction should be made accessible to younger children and young people in child and youth welfare facilities and programmes, provided that technological restrictions or educational supervision ensure that these risks do not materialise. For this purpose, the Youth Protection Act is to be amended.

The federal government is responsible for this; implementation takes place within the child and youth welfare services.

Effect

This makes it possible to explore the risks associated with use under educational guidance. Children and young people can engage with content rated for older age groups in a safe environment, which helps them to develop the skills to use media responsibly.



4.4 Health, counselling and therapy

Digital media are part of everyday life and do not, in themselves, pose a health problem. Stress arises from the interplay between patterns of use, the way services are designed, personal vulnerability and the social environment. Healthcare, counselling and therapy therefore require a tiered approach that does not stigmatize normal use, but identifies risks at an early stage and provides targeted support at the first sign of any issues.

The healthcare system reaches children and families at an early stage and almost universally, and is particularly trusted as a point of contact. Preventative check-ups, counselling services, and psychotherapy and addiction-related support services provide access at various levels of distress. Standardised diagnostic criteria, qualified professionals and reliable links between prevention, counselling and treatment are key to this. Cooperation with families, schools and youth support services is intended to prevent those affected from falling between the cracks of different areas of responsibility, or from only receiving help once their problems have become more serious.

RA 25 Develop a tiered prevention system with more tailored support for vulnerable children and young people

Problem

In the field of prevention, statutory health insurance legislation is still very much focused on general, primary prevention. Targeted support programmes for children and young people at increased risk or showing early signs of problematic media use are scarcely established. As a result, vulnerable young people in particular are identified too late and all too rarely receive the support they need. Existing structures within the healthcare industry, the educational system and youth support services often operate separately rather than working together.

Recommendation

Selective and targeted prevention should be legally enshrined in Book V of the Social Code (SGB V) and systematically reinforced. In Section 20 of Book V of the Social Code (SGB V), the word 'primary' is to be deleted and the terms 'universal', 'selective' and 'indicated prevention' are to be expressly included. Professional bodies should develop binding quality standards for digital interventions (health apps).

Responsibility for this task lies with the federal government, in particular the Federal Ministry of Health.

Effect

A multi-tiered prevention system is being established which identifies at-risk groups at an early stage and addresses their needs in a targeted manner. Risky patterns of substance use and psychological stress are reduced, cooperation between the agencies involved is improved, and the tiered care system is made sustainable in the long term.



RA 26 Introduce uniform standards for the diagnosis and treatment of behavioural addictions and addictive behaviour

Problem

Whilst most young people use digital services responsibly, some develop problematic or addictive patterns of use, which can be linked to psychological distress, social withdrawal, problems at school and health risks.

The World Health Organisation has, for the first time, introduced diagnoses for certain behavioural addictions in the ICD-11, thereby laying the foundations for their systematic identification and treatment. However, the official introduction of the ICD-11 in Germany has yet to take place in Germany. As a result, there are as yet no uniform standards for diagnosis, documentation and care.

Recommendation

The Federal Government should prioritise the official German translation of the ICD-11 and integrate it into medical, psychotherapeutic and addiction-related care as a matter of urgency. At the same time, professionals are to be given targeted training to deal with digital risks and media-related behavioural issues. Existing guidelines and healthcare services are to be further developed.

This is a matter for the federal government.

Effect

Health issues can be identified earlier, treated in a more targeted manner and managed in a way that allows for comparison across regions. This helps to prevent mental health conditions from becoming more serious, whilst at the same time providing a reliable basis of data and research for future prevention and care services.



RA 27 Expand a tiered approach to universal, selective and targeted prevention measures against excessive use and addiction

Problem

Effective, scientifically proven addiction prevention programmes have not yet reached all young people; they are neither available nationwide nor tailored to different age groups, and are based on an outdated concept of prevention.

Recommendation

Evidence-based prevention programmes focusing on excessive online use and -addiction are to be implemented nationwide in line with the new prevention approach (see [RA 25, 'Develop a tiered prevention system with more tailored support for vulnerable children and young people'](#)). Universal services should reach every child through schools and wide-ranging communication initiatives, supplemented by targeted services for at-risk groups and tailored support at the first sign of symptoms. Parents and educational professionals should be involved, and the programmes should be subject to scientific monitoring and further developed on the basis of their effectiveness.

Responsibility for this task lies with the federal and state governments, supported by stakeholders in media education. A coordination team is to ensure implementation and evaluation.

Effect

Young people are made aware of the risks associated with certain forms of use and are supported in developing their self-regulation and resilience. They learn to recognise manipulative tactics and to manage their media use independently, in order to prevent risky and addictive behaviour. Vulnerable children and young people are targeted through selective measures, whilst children and young people at risk receive individualised support at an early stage. By deliberately grouping prevention measures into the categories 'universal, selective and recommended', financial and human resources can be deployed in a targeted manner.



RA 28 Taking an approach to media and health that sees both as two mutually inclusive concepts

Problem

There is a close link between children's use of digital media and their physical and mental health: Long periods spent in front of screens and a lack of physical activity can affect, amongst other things, sleep, concentration, eyesight and weight. However, there is a lack of compulsory guidance on media use in preventive healthcare that reaches every child.

Recommendation

Counselling on media use and media education should be made a mandatory part of routine health check-ups, with a fixed slot allocated for it and appropriate remuneration provided. As trusted figures, paediatricians should make particular use of early preventive check-ups and, during subsequent check-ups and school entry medical examinations, address media use, problematic media consumption and the risks of addiction, whilst also discussing non-digital recreational activities.

The federal states and the healthcare funding bodies are involved.

Effect

Health risks are identified at an early stage, and families are given reliable counselling at an early stage. This helps to improve physical, mental and social health and promotes balanced, age-appropriate use of media.



RA 29 Strengthen and improve access to support services for children and young people

Problem

Children and young people have distressing experiences online, ranging from stress and anxiety to serious psychological consequences. Although there are numerous counselling and support services available, they are often unknown or people do not make use of them because of feelings of shame and fear. In addition to this, there are a wide range of obstacles when it comes to accessing these services. Young people facing multiple challenges and those in vulnerable situations, in particular, are too often unable to find suitable support services.

Recommendation

Existing counselling and support services should be strengthened in terms of staffing and funding, made better known, and made widely available and easily accessible. Gaps in provision are to be systematically identified, support structures for vulnerable groups expanded, and responsibilities made transparent.

Responsibility for this task lies with the federal government, the federal states and the local authorities.

Effect

The result is a reliable, familiar support system tailored to people's needs. Young people recognise risks, feel that they are taken seriously and seek support, so that vulnerable children and young people in particular are provided with protection and help at an early stage.



RA 30 Provide easy access to medical and psychological support for digital-related stress

Problem

Children and young people experience a wide range of psychological stresses when using the internet – such as the development of addiction, anxiety, depression and trauma caused by cyberbullying or sexual assault. At the same time, there are significant gaps in provision: The average wait time for a place on a treatment programme is over 28 weeks. Digital crisis intervention services such as Krisenchat (Crisis Hotline), JugendNotmail (Youth Emergency Mail) and U25 are not integrated into the healthcare sector; there is no digital health application (DiGA) specifically for children and young people; and professionals working in youth support services, schools and doctors' offices are scarcely integrated into any coordinated networks. Young people with pre-existing conditions, the effects of trauma or social disadvantage are particularly affected. Without early intervention, there is a risk of the condition becoming chronic and gaps in care arising.

Recommendation

Access to medical and psychiatric support is to be made more accessible, faster and better integrated, in line with a stepped-care approach. Quality-assured digital services are to be introduced as a first step alongside the established frameworks and integrated with the medical sector through a joint counselling and care alliance. Evidence-based digital interventions and digital health applications (DiGA) for children and young people should be integrated into standard care, and their authorization should be promoted, with particular priority given to vulnerable groups.

Responsibility for this task lies primarily with the federal government, which governs psychiatric care, needs assessment, the regulation of digital health applications (DiGA) and statutory health insurance, as well as with the federal states, which are responsible for organising child and youth welfare services, educational provision and regional care networks.

Effect

This will result in strengthened crisis intervention services that are available round the clock, better integration of digital, outpatient and inpatient care, a visibly higher utilisation of support services by young people affected, and a significant reduction in wait times for psychotherapy – with the aim of reducing the incidence of untreated secondary mental health problems.



4.5 Complaints offices, specialist agencies and public safety authorities

When children and young people experience abuse or criminal offences in the digital space, they need clear channels through which they can report these, rapid support and an effective response from the authorities. Systems that are geared towards adult procedural logic or are, by their federal nature, difficult to navigate create greater obstacles, particularly for young people affected. Complaints bodies, established organisations for the protection of young people in the media, and public safety authorities should therefore be regarded as a coherent framework for protection and intervention.

For this purpose, the tried-and-tested institutions responsible for the protection of young people in the media are to be secured for the long term, properly resourced and more closely integrated with one another. *clicksafe*, as the German Safer Internet Centre; *jugendschutz.net*, as the joint centre of expertise for the federal government, the federal states and the state media authorities; and the *SCHAU HIN!*(PAY ATTENTION!) initiative work together to fulfil important functions in protecting and empowering children and young people, for example by monitoring and assessing digital risks, providing help and remedies for problematic content, and supporting parents and professionals with information and educational resources. However, funding for this initiative is uncertain and, in some cases, declining. In view of the growing challenges posed by highly dynamic developments in the media, a reliable and secure long-term foundation is needed here.

The joint protection framework also includes age-appropriate access points, trained contact persons and sufficient staff and technical resources. Prevention, counselling, proactive investigative work, the removal of unlawful content and referral to appropriate support services should all work in tandem. The aim is to create a digital space in which the law is visibly upheld, tried-and-tested support structures work together effectively, and those affected are not left to cope on their own.

RA 31 Strengthen digital policing

Problem

For minors, the digital space is both a social environment and a place where crime occurs. However, the public safety authorities are far less visible and approachable there than in real life, which reinforces the impression that there is little pressure from law enforcement. As a result, criminal acts such as cybergrooming are sometimes deemed as normal. Policing in the digital sphere is also strongly influenced by the federal system and varies considerably from one state to another.

Recommendation

Federal and state public safety authorities should step up their policing efforts in the digital sphere and focus them on the protection of children online. In addition to consistent law enforcement, they should focus on easy access and prevention, for example through verified accounts, a central internet police unit and an online child protection unit (see [RA 32 “Online child protection unit – establish a nationwide reporting and notification centre for public safety authorities dealing with minors”](#)). Platform operators should work together by using verified police accounts, rapid communication channels and report buttons. This is to be achieved through uniform standards for initial and continuing training. The implementation of cross-border initiatives, such as joint virtual police patrols, are also to be considered. These measures are to be incorporated into an overarching strategy for digital policing, which recognises the digital protection of children as a central component of the policing body’s duties in the digital sphere.

Responsibility for this task lies with the federal government and the federal states.

Effect

The digital world is becoming safer for children and young people. The pressure of law enforcement is mounting, the police are becoming more visible and more accessible, and the perception of this sphere as a lawless wild west is diminishing.



RA 32 Children's Online Helpline – establish a nationwide reporting and information centre for the public safety authorities to deal with cases involving minors

Problem

Up until now, children and young people have not had easy, clear and age-appropriate access to help from the public safety authorities in the digital sphere. Existing services, such as the police's online helpdesks, are predominantly tailored to adults, structured in a rather formal manner and, despite the global nature of the digital space, fragmented along federal lines. There are significant obstacles to reporting such offences, and people – particularly minors – are reluctant to do so. Young people themselves describe the existing support services as not very practical.

Recommendation

The federal and state governments should jointly set up a nationwide, child-friendly reporting and referral centre for the public safety authorities (Online Child Watch). This should feature an age-appropriate user interface, direct communication – for example via chat – and ongoing educational support; it should be adequately funded and, where necessary, regulated by the law. The programme is to be coordinated at European level, publicised through a wide-ranging public relations campaign and integrated into a strategy for digital policing.

Responsibility for this task lies with the federal government and the federal states.

Effect

Children and young people can report digital risks and criminal offences more quickly, more securely and without having to overcome major obstacles. People are more willing to report incidents and make direct contact; help is provided at an earlier stage; and those affected are referred to the support system more reliably.



RA 33 Consistently combat depictions of sexual violence

Problem

Depictions of sexual violence against minors are among the most serious violations of children's rights in the digital sphere, and the volume of such content being circulated is on the rise. Law enforcement agencies and complaints offices lack the financial and human resources needed to deal adequately with the increased caseload. There is a widespread lack of capacity for the proactive detection of child abuse material, meaning that both common and new distribution channels often go undetected.

Recommendation

Established complaints offices, investigative authorities and the justice system should be provided with sufficient financial and human resources to enable them to proactively detect depictions of sexualised violence, process reports professionally and promptly, and demand their removal. For this purpose, the necessary legal, technical, financial and staffing requirements must be put in place.

Responsibility for this task lies with the federal and state governments, as well as the internet industry.

Effect

Reported content is removed swiftly, and its widespread dissemination is curbed through targeted detection, prosecution and removal. The grey area is gradually being brought to light. Victims of sexual violence are protected from further dissemination of the material and from being victimised again.



RA 34 Combat digital sexual offences through police ‘undercover child’ operations

Problem

The likelihood of minors of all ages being exposed to cybergrooming and other digital sexual offences in the digital space is high. Around one in four minors report having had such experiences. Many minors now regard such assaults as normal. At the same time, it is unlikely that these offences will be prosecuted and brought to light.

Recommendation

The government’s efforts to combat cybergrooming and other digital sexual offences are to be significantly intensified through preventive and proactive detection mechanisms, as well as through rigorous law enforcement. In particular, the police authorities should regularly and in a coordinated manner expand the use of ‘child-in-disguise’ operations (covert investigative measures in which investigators pose as children).

This requires closer coordination and cooperation between the public safety authorities of the federal states, as well as the provision of the necessary resources.

Effect

Offenders are facing prosecution more frequently and more swiftly. This reduces the likelihood of minors being exposed to such offences and helps to break down the perception that digital abuse is the norm.



RA 35 Develop standardised criteria and data exchange for depictions of sexual violence

Problem

The online distribution of depictions of sexual violence against children and young people has increased significantly in recent years, particularly through the use of artificial intelligence. To date, public authorities and complaints offices have not been recording such content according to uniform criteria and rarely exchange data. As a result, familiar content is reviewed multiple times, new content is discovered later than it might otherwise be, and those involved in processing it are placed under considerable strain.

Recommendation

The Federal Government should commission the development of a standardised data format for automated identification, which enables content-based classification via metadata and technical verification via hash values. This will form the basis for the creation of a shared data pool, which will be available to investigating authorities, complaints offices and, via interfaces, hosting providers for cross-referencing. The format is intended to be compatible with tried-and-tested systems internationally.

Responsibility for this task lies with the federal government and the federal states.

Effect

Familiar content is automatically recognised and processed without the need for further review, whilst new content is identified more quickly. This reduces processing and availability times, better protects those affected against further dissemination; eases the workload on those processing the cases, and strengthens international cooperation.



4.6 Platforms, service providers and the internet industry

Many risks arise not from users' behaviour, but from the way the services themselves are designed – for example, through algorithmic recommendations, endless feeds, manipulative notifications or business models aimed at maximising time spent on the platform. Risks inherent in the product must be mitigated at the source.

This responsibility should be embedded in the design and operation of these services from the outset (protection of minors by design/default) and enforced by binding European rules and effective oversight. Age-appropriate access, procedures to minimise data, secure default settings and clear complaints procedures are intended to ensure protection without preventing participation across the board. At the same time, there is a need for attractive, child-friendly alternatives developed under European oversight, to ensure that regulation not only limits risks but also facilitates safer digital spaces. Because the major platforms operate across borders, unilateral action at national level is not enough. The recommendations therefore rely primarily on European law and effective supervision.

RA 36 Risk- and design-oriented regulation – two alternatives: a statutory minimum age limit (13 years) and job-specific age limits

Problem

Children and young people are exposed to significant risks on social media and other online platforms (see the [5C classification in the overview](#), p. 111). These include depictions of violence and pornography, hate speech, disinformation and unrealistic beauty ideals, as well as cyberbullying, cybergrooming, sexual harassment, financial risks and excessive use. Many of these risks are exacerbated by the way services are designed, for example through algorithmic recommendation systems, endless feeds, autoplay, manipulative notifications or personalised advertising.

Article 28(1) of the Digital Services Act (DSA) does, however, require platform providers to ensure a high level of privacy, security and protection of minors. However, the provision remains vague and does not specify in sufficient detail which measures are required for which services, functions and age groups. The European Commission's guidelines clarify these obligations; however, the extent to which they are legally binding has not yet been definitively established for providers or for the relevant supervisory authorities.

Furthermore, relevant social media platforms have not yet implemented effective age verification measures. Age limits set by the providers themselves are therefore largely ignored. However, the protective measures set out in the guidelines can only be fully effective if age verification is carried out properly. Whilst the precautionary measures implemented by providers to date have already improved protection against risks on the platforms in many areas, they often leave untouched those features that are particularly important for user engagement, time spent on the platform and advertising revenue.

In response to this, several countries are considering introducing minimum age limits of 15 or 16 for social media. However, setting a high age limit in relation to children's and young people's current media use does not go far enough. It treats very different services and functions in the same way, even though the risks associated with them vary considerably. It hinders young people's access to information, the formation of political views, cultural orientation, social contacts and participation in public life. This particularly affects young people who have limited access to their peers, support services or public debates outside digital spaces. High age limits are also likely to be met with little acceptance and encourage attempts to circumvent them. If users are excluded from regulated platforms, they may turn to less regulated platforms or conceal their true age. This would make it even more difficult to design the site in a way that is suitable for older people. Regulation should therefore focus on the platforms, their functions and the risks they pose.

Recommendation

The expert commission recommends that Article 28(1) of the DSA be set out in binding terms. Platform providers should be required to design their services to be age-appropriate from the outset and to systematically minimise risks to children and young people. The legal requirements are intended to clearly set out which protective measures apply to specific age groups, services and roles. The European Commission, the Federal Children's and Youth Media Authority (BzKJ) and the state media authorities should effectively monitor implementation and rigorously pursue any breaches.

There are two options for the design.

(1) Under the first option, a **statutory minimum age of 13** is to apply to the independent use of one's own social media accounts. It should be linked to an effective age verification process. For children under the age of 13, a statutory authorisation requirement is to be introduced, permitting content that is demonstrably low-risk and suitable for children. The right of mothers and fathers to bring up their children shall be upheld, provided that this does not jeopardise the child's physical, mental and emotional well-being.

Different levels of protection are to apply to young people aged between 13 and 18. A distinction should be made between the age groups 13 to 16 and 16 to 18. High-risk features should be disabled by default (see [RA 37 'Safe and age-appropriate default settings and design requirements for youth accounts'](#)).

(2) Under the second option, there would be no uniform statutory age limit. Instead, Article 28(1) of the DSA is to be supplemented by a binding provision stipulating that accounts, services or **individual functions must be restricted for certain age groups** where they pose particular risks in terms of their effects or use. The age limit applicable in each individual case should be determined by the risk assessment of the relevant service. This is intended to provide the regulatory authorities with a clearer legal basis for imposing age-based restrictions on, for example, algorithmic feeds, open contact features, live streams or other high-risk content.

In both cases, unilateral action at the national level should be avoided. The relevant platforms offer their services beyond national borders and, in many cases, do not have their European headquarters in Germany. National requirements could therefore only be enforced to a limited extent with regard to service providers. Furthermore, there is legal uncertainty as to the extent to which individual Member States may impose additional obligations on platform providers alongside the largely standardised DSA. Such arrangements would be exposed to a significant risk of proceedings under European law and protracted legal disputes. As a result, their practical impact could remain limited for years to come.

The European country-of-origin principle also makes it difficult for an individual Member State to enforce universally applicable requirements on platforms based in another Member State. A German law could therefore raise high political expectations without ensuring that it is reliably enforced against the relevant providers. Furthermore, differing national age limits and protection requirements would lead to a regulatory patchwork that would be difficult for children, parents, providers and supervisory authorities to understand, and could encourage circumvention.

A national ban on use aimed directly at children and young people should also be avoided. Children and young people are the group that needs protecting and should not be held responsible or penalised for using services that are inadequately secured. Monitoring by local authorities would be virtually impossible to implement and would run counter to the fundamental principle of the protection of children and young people in the media, according to which regulation focuses on the risks and the providers responsible. A detailed legal analysis of the above-mentioned issues will be published in July 2026, together with the full versions of the recommendations for action.

The Federal Government should therefore advocate at European level for the mandatory further development of the DSA and for uniform guidelines on age verification (see [RA 38 'Establish binding rules for effective and data-protection-compliant age verification whilst safeguarding fundamental rights'](#)) on age-appropriate design and on service-specific access restrictions. European legislation establishes common standards across the entire domestic market and enables the relevant authorities to take effective and legally sound action against platforms operating beyond national borders.

Effect

The recommendation holds platform providers accountable as the architects of digital services. In future, the risk-based approach known as 'protection of minors by design' or 'protection of minors by default' will apply.

The first option establishes a clear and easily understandable age limit, as well as reliable standards of protection. The age limit takes effect immediately; the remaining regulations are based on the risks associated with the features and design. The requirement for authorisation for child-friendly services also ensures that younger children have access to digital opportunities for education, communication and participation.

The second alternative avoids setting a uniform age limit and follows the DSA's risk-based approach by linking protective measures to the risks associated with individual services and functions. This requires Article 28(1) of the DSA to be clarified at legislative level by adding a new second clause, which sets out risk-based and service-specific standards for account and access restrictions, without specifying uniform age limits. This approach could be applied flexibly beyond Article 28 of the DSA to new platform functions, business models and artificial intelligence applications.



RA 37 Safe and age-appropriate default settings and design requirements for young people's accounts – ensure child protection 'by design' and 'by default'

Problem

Children and young people face considerable risks when using social media. A significant proportion of these risks stems not from specific content, but from the design of the services themselves: Algorithmically optimised feeds, features that encourage addictive behaviour, manipulative design patterns (dark patterns) and risky default settings systematically increase time spent on the platform and the potential for exploitation. The DSA counters this with a risk-based approach – providers must take appropriate and proportionate measures to protect minors. However, this approach remains insufficiently effective in practice: Article 28(1) of the DSA is worded in general terms; to date, the measures required have only been specified in the Commission's guidelines, and there is no binding, standardised list setting out the specific safeguards that a youth-friendly account must include. As long as it remains unclear exactly what 'protection of minors by design and by default' entails, such protection will continue to depend on the interpretation and willingness of individual providers to implement it.

Recommendation

A binding set of safe and age-appropriate default settings and design requirements is to be established for accounts held by minors, and the provisions of Article 28(1) of the DSA are to be strictly enforced. The requirements must be tailored to different age groups (in particular 13–16 and 16–18 years) and set as the default – that is, without any action on the part of the young users. The list includes:

Feeds, recommendation systems and advertising

- No algorithm-driven feeds or recommendation systems; no personalised content delivery; the feed must be limited to subscribed or actively selected profiles.
- No personalised advertising on young people's accounts.

Ban on features that encourage addiction and dark patterns

- Exclusion of endless feeds, autoplay, usage-based reward systems, artificial reminders and emotional appeals ("We miss you", "Your friends are waiting for you").
- Exclusion of features that force immediate or ongoing use (e.g. time-limited content, posting requirements, rewards for activity).
- A ban on non-transparent in-app purchases, artificial scarcity and 'confirmshaming' (time-related and psychological pressure when declining offers, e.g. 'No thanks, I don't want to save money').
- Push notifications are disabled by default or significantly reduced, depending on age.

Secure default settings

- Private mode by default; messages can only be sent by verified contacts; age displayed for contact requests.
- Commenting, tagging, sharing and reposting are restricted to verified contacts by default; any exceptions are accompanied by a warning; comment sections can be easily disabled.
- Location detection and online status are disabled by default.
- All settings are easy to find and their implications are clearly explained; it is easy to delete your own account.

Effective reporting and blocking functions

- Easy to find, accessible and formulated and designed to be suitable for all ages, without the need for legal assessment.
- Priority processing of reports made by minors; mandatory notification of the outcome of the proceedings to the person who made the report.

Protection against harmful content and interactions

- No use of live streaming; no receipt of virtual gifts.
- Labelling of AI-generated content.
- Warnings and blurring of sensitive content, as well as warnings regarding redirection to external websites.
- AI-powered detection of risky or harmful usage patterns (e.g. adults initiating contact, sharing mobile numbers or intimate images) accompanied by preventive warnings.

Regulation of usage time

- Pre-set daily limits and periods when the app cannot be used (e.g. at night); break reminders every 30 minutes.
- Easy-to-find settings for custom time limits, break functions and managing push notifications during rest periods.

Parental support

- Tools for setting time limits and periods when the service cannot be used, for restricting purchasing options, for setting spending limits, and for granting approval on a case-by-case basis.

Help, anonymity and data deletion

- Preventative and situation-specific guidance on counselling and support services (e.g. in cases of excessive use, self-harm, eating disorders, cyberbullying).
- Full right to the complete deletion of personal data.

Effect

The list shifts the focus of protection from individual competence to the structural level: It works regardless of whether parents, schools or the young people themselves have the necessary media literacy, because risky features are already disabled by default. Providers must take the initiative to design their services in a way that is suitable for young people, rather than simply reacting to regulatory requirements.

The degree of protection varies across the five categories of risk: Behavioural and consumer risks (e.g. excessive use, loss of financial control) can be effectively addressed through the precautionary measures mentioned; risks arising from contact with strangers (e.g. cybergrooming) are mitigated by secure default settings. Risks relating to peer interactions (e.g. cyberbullying) and content-related risks, however, remain to some extent. The list therefore only achieves its full impact when used in conjunction with related areas of action – promoting media literacy, working with parents, and child and youth welfare services.

At the same time, the comprehensive list provides predictability and clarity regarding standards for providers, parents and young people, and relieves parents of the burden of having to check each service individually for risky features. It focuses on shaping the services rather than imposing a ban on their use, thereby safeguarding the social and communicative participation of young people. It protects them furthermore not by excluding them, but rather by enabling safe use.



RA 38 Introduce binding regulations for effective and data-protection-compliant age assessment whilst safeguarding fundamental rights

Problem

Age verification measures are designed to protect children and young people from particularly harmful content, such as pornography, right from the start. Their importance is further heightened where statutory minimum age limits apply to social media or other digital services. However, there are as yet no specific and binding guidelines on which procedures providers should use and how these should be implemented from a technical perspective. This means that the platforms largely decide for themselves what form age verification takes.

The available methods differ considerably in terms of their reliability, their susceptibility to circumvention and their impact on users' fundamental rights. Methods that analyse biometric characteristics or infer a person's age on the basis of extensive behavioural and usage data are particularly problematic. They pose risks to privacy, informational self-determination and protection against discrimination. At the same time, there is a risk of a further concentration of power amongst major platform and operating system providers if they become the central intermediaries for digital proof of age. Inadequate guidelines therefore jeopardise not only the effective protection of children and young people, but also their participation and the rights of all users.

Recommendation

The European Union and the Federal Government should lay down binding rules specifying which age-verification technologies are permitted for which services and content. The level of protection required should be based on the specific risk.

(1) Lay down specific minimum technical requirements that are legally binding

- The separation of the issuer and the verifier, as well as selective disclosure – only information on whether a specific age limit has been reached will be provided;
- Processing of biometric data and personal data exclusively on the end device or under the control of users;
- A ban on any storage of data beyond the purposes of age verification, as well as on any use of the resulting data for advertising, profiling or tracking;
- Compliance with publicly verifiable, disclosed cryptographic protocols.

(2) No age estimation involving data transmission from the end device

Age verification checks carried out by service providers can constitute a significant intrusion into privacy. Data-based estimation methods are particularly problematic, as

they require either biometric data (age estimation) or invasive tracking (age inference), in which data from various sources is linked to create detailed profiles. Technologies for determining or estimating age, in which biometric, identity or behavioural data leave the end device, should therefore be prohibited. Age verification checks should primarily take place on the end device.

(3) Limit market power and gatekeeping

Major platform and operating system providers could use regulations on the protection of children and young people to strengthen their position and expand their data collection. Providers such as Google, Apple or Meta, which already hold verified identity data, could position themselves as issuers of age verification and, in doing so, tacitly centralise control once again in their capacity as identity and compliance brokers. Furthermore, age estimates generate new data signals (age threshold, verification time, device information) that can be used for profiling and advertising. The legislator should ensure that the requirements do not create any new advantages for gatekeepers that undermine the objectives of the Digital Markets Act. Interoperable, independent and European-controlled solutions that comply with European values, standards and legislation – such as the EUDI Wallet – are to be supported through funding for research, innovation and infrastructure.

Option 1: Upon the introduction of a statutory minimum age for social media

If a statutory minimum age for social media is introduced, verification of this age should primarily be carried out via the EUDI Wallet or technically equivalent, interoperable systems that have been tested in accordance with European standards.

Option 2: Risk-based tiered model (without a general minimum age)

Level 1 – Parental control systems as the standard: Access restrictions should primarily be implemented via parental control and consent mechanisms on end devices, which enable parents to restrict access to certain content and services, as well as usage times, on those devices. These methods are sufficiently effective, have relatively few side effects and are consistent with parents' freedom to bring up their children as they see fit. However, parents and legal guardians must be given significantly better support than they have received to date, namely through: a) better technical tools that enable them to restrict access to apps, features and content, as well as total usage time, in a simple, secure and tailored manner; b) guidance on how they can effectively protect their children from digital risks using these tools; c) independent bodies that review the age ratings of digital content.

Level 2 – Age verification at device level (supplementary): As parental controls are only effective if parents use them, mandatory age verification on end devices can be used as a supplementary measure, for example through age estimation via a camera or verification using official identification documents. In this context, the data – particularly biometric data – must remain on the end device and be used solely for age verification where only

the relevant age-related information is transmitted. Such methods are easier to implement and respect privacy, but they increase dependence on operating system providers.

Level 3 – EUDI Wallet for more stringent legal requirements: In the case of content which, under the Criminal Code or Section 4 of the JMStV, must not be made available to minors, providers must verify the user's age using official documents and also check whether the proof of age has been provided by the person accessing the content. The EUDI Wallet is recommended for this purpose, provided that the eIDAS 2.0 Regulation is fully complied with and the technical and infrastructural requirements are met. It then offers strong safeguards for privacy, reduces dependence on operating system providers, and also works on laptops and desktop computers. Alternatives such as the mini-wallet or showing your passport and face to the camera should be rejected on grounds of security and privacy protection.

Regardless of the model chosen, children and young people, parents and guardians, civil society, public authorities and service providers should be involved at an early stage and provided with clear information; in addition, sufficient lead times must be allowed for.

Responsibility for this task lies with the EU legislative bodies and the Federal Government.

Effect

Binding and risk-based standards provide legal certainty and prevent platforms from deciding on their own about procedures that are particularly relevant to fundamental rights.

Data-efficient processes, which are carried out on the end device wherever possible, strengthen data protection and the right to the control of personal information for all users. At the same time, interoperable and independent solutions limit new dependencies on large technology companies, promote competition and strengthen European digital sovereignty. Easy-to-understand monitoring options and clear responsibilities take the pressure off parents and guardians and increase acceptance of age verification. In this way, protection, empowerment and participation are linked, rather than being presented as mutually exclusive.



Problem

Digital platforms organise and recommend content using algorithmic systems that are shaped by profiling, time spent on the platform, advertising interests and platform objectives. As a result, users are shown a curated selection, but often do not understand why certain content appears. They struggle to find the available settings, do not understand them, or feel that they are ineffective. This has particularly far-reaching consequences for children and young people, as recommendations influence their perception and development.

Recommendation

Users should be able to control the content and recommendations they see using transparent, clear and age-appropriate categories. Platforms with recommendation systems should be required to provide easily accessible settings for selecting, prioritising, reducing and excluding content, which should also apply to recommendations, autoplay, search suggestions and notifications. For minors, they should be securely configured in accordance with the ‘protection of minors by default’ approach. The DSA’s obligations under Articles 27 and 38 are to be specified in detail, monitored and verified through independent audits.

The parties involved are the EU, the federal government and the relevant supervisory bodies.

Effect

Young people can help shape the environment in which they receive and interact with information and content in a transparent and self-determined way. They can independently minimise content that is distressing or unsuitable for their age group, actively pursue positive interests and, at the same time, gain an understanding of how digital recommendation systems work.



Problem

The DSA requires online platforms to ensure that their services are safe for children and young people (Article 28(1) of the DSA). However, small and micro-enterprises are exempt from this obligation (Art. 19(1), first sentence, DSA) – based solely on the number of employees and turnover, and regardless of the actual risk associated with their services. As a result, platforms that are classified as small businesses but are used by hundreds of thousands or even millions of minors and pose significant risks also slip through the regulatory net.

Recommendation

This exemption should no longer be based on the size of the company, but on the actual risk and on use by minors. An obvious approach would be to set a limit based – as is the case with the classification of very large platforms (Article 33(1) of the DSA) – on a specified number of users; a range of between one and 45 million users would be feasible.

Responsibility for this task lies with the EU's legislative bodies, with the European Commission taking the leading role.

Effect

The DSA's aim of protecting children and young people applies to all activities that pose a potential risk, regardless of the size of the organisation or its turnover. The supervisory authority will be able to take effective action without placing a disproportionate burden on small, low-risk operations.



Problem

Posting pictures and videos of children on social media is common, but from the children's perspective it is a cause for concern: The younger children are, the less able they are to give informed consent. Such content leaves behind a lasting digital footprint. Once content has been published, it is almost impossible to retrieve it, and it carries risks of data and image misuse, which are on the rise due to artificial intelligence and deepfakes. Media education campaigns are not sufficient as a means of raising awareness.

Recommendation

To protect children's privacy, providers on the DSA are to be required to display brief warning messages, at random and without processing personal data, which highlight the risks of uploading audiovisual content featuring children and set out ways to restrict its visibility. A ban would infringe on the rights of the parent as set out in Article 6 of the Constitution. Notifications that can be dismissed by clicking are already commonplace and only slightly restrict commercial freedom.

Responsibility for this task lies with the EU's legislative bodies, with the European Commission taking the leading role.

Effect

Parents are made aware of the consequences when uploading content, and this raises their awareness of the issue; as a result, they are more likely to reconsider their choice of images and how visible they are. This does not call parental responsibility into question, but rather supplements it with a readily accessible protective measure.



Problem

Government bodies are right to warn against posting pictures of children online, as these can be misused through artificial intelligence, facial recognition and deepfakes, and children end up leaving behind an irreversible digital footprint at an early age. At the same time, public authorities, schools, childcare centres and other public institutions publish images of children in which they can be identified, for example in press and public relations communications. This undermines their own warnings and the precautionary measures taken by cautious parents.

Recommendation

Public bodies should lead by example in the field of digital child protection and voluntarily undertake not to publish identifiable media recordings of children – images, videos and audio recordings – on the internet. A template for sensitive public relations work and guidelines containing positive examples are to be drawn up, and alternative forms of presentation, such as drawings or implicit representations, are to be used. Associations and non-governmental organisations should also consider committing to the same.

This applies to the federal government, the federal states and local authorities.

Effect

Children are protected against the misuse of their images and retain the ability to shape their own digital identity later on. At the same time, the exemplary conduct of public authorities raises awareness throughout society of the need to exercise restraint when dealing with images of children.



Problem

Children and young people are visible in digital spaces – either actively as content creators and influencers, or passively as part of their parents’ or other people’s online activities. Engaging in one’s own online activities can foster creative self-expression, participation, empowerment and support. At the same time, the publication, dissemination and commercial exploitation of photographs, videos, voice messages and personal information can cause lasting harm to children’s personal rights, privacy and digital self-determination. Parents and guardians therefore have a particular responsibility to prioritise their child’s rights and interests over visibility, exposure and commercial exploitation.

When platform dynamics and monetisation create economic incentives for children to be visible, education and individual responsibility alone are often not enough. The existing provisions governing the participation of children in media productions, as set out in the Youth Employment Protection Act (JArbSchG), do not adequately cover the situation; furthermore, youth welfare offices are rarely made aware of such activities.

Recommendation

The German government should establish a binding regulatory framework for commercial child and family influencing. In particular, consideration should be given to age limits for commercial social media accounts, a ban on intimate, humiliating or emotionally distressing content, effective rights of withdrawal and deletion for children, and the financial participation of minors in monetised content, for example via trust accounts modelled on international practices. This is in line with the recommendations of the German Bundestag’s Children’s Commission. In addition, a reform of the Youth Employment Protection Act (JArbSchG) is to be considered, as new forms of economic activity undertaken by children in the digital sphere have not yet been adequately addressed.

Requirements for child influencers and parent influencers must be workable, effective and complemented by efficient mechanisms for supervision. Common guidelines, cross-sectoral cooperation and dialogue between the relevant authorities responsible for health and safety at work, media regulation and youth welfare can promote a consistent understanding – particularly with regard to the best interests of the child and risks to a child’s welfare – as well as coherent enforcement of the law.

Platform operators should include depictions of minors, particularly in the context of family influencing, in their community guidelines. These include limits on certain content and rules ensuring compliance with national child labour laws. Providers should consistently remove content from accounts, agencies, advertising partners and platforms that violate children’s rights from their platforms.

Particular attention should be paid to the support provided to parents by youth welfare offices and counselling services. This requires accessible guidelines, advisory services and information materials that explain when restraint is required when publishing content, how children can be involved, and what the limits are on commercial exploitation.

Responsibility for this task lies with the federal government and the service providers.

Effect

Parents are made aware of their children's need for protection and prioritise their rights, privacy, self-determination and well-being over exposure, marketing and commercial interests. Younger children are better protected against publication without their consent; older children and young people are given greater autonomy in making their own decisions about their digital presence. Legislative amendments can provide more binding protection for particularly vulnerable groups where counselling alone is not sufficient.



Problem

Since 2021, German legislation on the protection of minors has taken into account not only content-related risks but also usage risks when assigning age ratings. However, the current lists do not cover AI applications such as image-generating AI or communication with chatbots. Furthermore, it is unclear whether functions that only generate content at the user's request are covered by the regulations. This gives rise to legal uncertainties in supervisory and rating practices.

Recommendation

The risks associated with use, as set out in the Youth Protection Act (JuSchG) and the State Treaty on the Protection of Minors in the Media (JMStV), are to be extended to include AI-related applications, in particular the generation of harmful text, audio and visual content, as well as communication risks arising from the use of bots. Under the JuSchG, this is to be achieved through Section 10b(3), and under the JMStV through Section 5(1).

Responsibility for this task lies with the federal authorities (BMBFSFJ) and the state legislatures.

Effect

When assessing digital services, AI-related factors are clearly taken into account in the age rating system. For providers, this brings greater clarity regarding standards; for supervisory bodies and self-regulatory organisations, it enhances legal certainty in rating practices.



Problem

Charities are reporting a significant rise in AI-generated deepfake pornography. Much of it is directed against women and, increasingly, against girls. The technical obstacles to producing sexualised depictions of children and young people have fallen significantly, and the number of reports of such material has risen sharply. Such content serves to manipulate, blackmail and intimidate, and contributes to the normalisation of sexualised violence.

Recommendation

The proposed Digital Protection Against Violence Act drawn up by the BMJV should be passed without delay and implemented consistently. In addition, a nationwide awareness-raising campaign, running across both analogue and digital platforms, is intended to raise awareness amongst young people, parents, teachers and educational professionals.

Responsibility for this task lies with the EU and the federal government. The campaign is to be implemented by the relevant federal authorities.

Effect

Protection against digital violence under civil and criminal law is being improved, and the scope of the phenomenon is being defined more clearly. The sale of such applications is being banned across Europe, and the target groups are being made aware of the risks and the options available to them.



Problem

AI companions are designed to foster emotional closeness and bonding through ongoing, personalised interactions. This poses significant risks, particularly for vulnerable children and young people: Parasocial relationships, excessive use and emotional dependence may be encouraged; there is also discussion of a possible exacerbation of psychological stress and mental health conditions. Children and young people may deliberately set up chatbots to pose as friends or trusted allies, without being able to adequately assess their commercial functionality and technical limitations. The existing provisions of the European AI Regulation and the DSA do not yet adequately address specific, related risks.

Recommendation

A statutory age limit of 13 is to be introduced for the use of AI companions. Regulation should preferably be implemented at European level and be linked to the AI Regulation or the proposed Digital Fairness Act. Providers should be required to implement effective measures to protect minors that are proportionate to the risk involved. These include reliable age verification, default settings appropriate for children and young people, safeguards against emotional dependence and excessive use, and, in particular, clearly recognisable indications that the relationship is not with a real person. Compliance with the requirements is to be ensured through regulatory oversight and effective sanction mechanisms.

Responsibility for this task lies with the EU and the federal government.

Effect

Children and young people are protected from AI companions that are not age-appropriate, in accordance with the principle of precaution. The existing regulatory gap will be closed, and responsibility will be consistently placed with the providers.



Problem

There is a significant gap in the provision of child-friendly online resources, particularly for older primary school children. Children are largely unable to fulfil their needs for participation, a sense of belonging and interaction through the existing provision, and therefore turn to services that are not designed for them and are often not age-appropriate.

Recommendation

The development and operation of child-friendly and age-appropriate online services for the under-thirteen age group are to be promoted more actively than before. The BzKJ is already responsible for a funding programme. This is to be significantly expanded, extended to allow for funding over several years, and supplemented by competitive initiatives such as challenges set by the Federal Agency for Breakthrough Innovations. National or European initiatives should take the needs of vulnerable groups into account.

This is a matter for the federal government.

Effect

Children and young people are provided with safe, attractive alternatives that meet their needs for information, play, interaction and communication in a way that is appropriate for their age. This will strengthen their right to digital participation and reduce their dependence on international technology companies.



Problem

Artificial intelligence has a significant influence on the development of children and young people, including with regard to the fostering of democratic values. Disorientation and misinformation caused by AI-generated content pose a significant risk that undermines the very foundations of democratic society. This problem is exacerbated by the fact that many AI services are developed and provided from outside the EU. At the same time, there is a significant shortage of AI designed for children and young people; there is a general lack of appropriate programmes that prepare children and young people for life with AI in a way that is appropriate to their age.

Recommendation

The Federal Government should work towards developing and promoting child-friendly AI in Germany and the EU, whilst safeguarding the EU's digital sovereignty. For this purpose, AI real-world laboratories are to be established in accordance with Articles 57 to 59 of the AI Regulation, with the goal of developing child-friendly AI, including in the sensitive area of safeguarding democracy. The funding is to be organised as a joint initiative between the EU and the Member States. The federal government should take the lead; the EU, together with the Member States, should implement and monitor the measures.

Responsibility for this task lies with the EU, the federal government and the federal states.

Effect

Age-appropriate AI initiatives are being developed that combine the protection of minors with the safeguarding of democracy, and prepare children and young people to use AI with confidence. This will strengthen Europe's digital sovereignty and reduce its dependence on non-European systems.



RA 49 Industry certification for toys: Develop ‘child-safe AI’ alongside an information campaign

Problem

In homes and children’s bedrooms, we are increasingly seeing products featuring natural-sounding speech and interactive features, such as voice assistants or AI-powered toys. Children entrust them with personal information, which is transmitted to servers and linked to profiles. Such systems rely on manipulative strategies and excessive validation. Little research has yet been carried out into the long-term consequences for children, but the potential risks are evident.

Recommendation

Building on the DSA and the AI Regulation, an industry-led ‘Child-Safe AI’ label for toys is to be developed, with the criteria for this label being drawn up under the leadership of the BzKJ in consultation with civil society. The launch is to be accompanied by an information campaign and supplemented by a nationwide training programme.

This applies to the EU and the federal government, manufacturers and the retail sector. Enforcement is to be the responsibility of the BzKJ.

Effect

The very process of developing the criteria is raising awareness amongst retailers and manufacturers. Products become safer thanks to secure default settings and standardised configuration options for parents; public awareness of the risks is increasing; and an industry standard is emerging that provides guidance for consumers and protection for children.



Problem

In Europe, there is a lack of sufficiently scalable and user-friendly alternatives to the large platforms that dominate the market. Regulation under the DSA – the Data Protection and AI Act – remains necessary, but it merely addresses the symptoms and does not itself create alternatives that children, young people and adults can turn to .

Recommendation

Germany and the EU should support trustworthy European platform and data infrastructures that combine data protection, the protection of minors through design, security, interoperability, accessibility, user control and democratic oversight. Open, protocol-based approaches such as EuroSky and Fediverse models are intended to enhance data portability, European hosting and the ability to switch providers. Through competitive innovative processes, strategic public procurement and targeted research, various models are to be tested and successful proposals scaled up over a period of several years.

The EU, the federal government, the federal states and local authorities are all involved.

Effect

A diverse range of European platforms is emerging, offering secure, attractive alternatives that comply with fundamental rights. Children, young people and adults can now take their data, contacts and identities with them more easily and are no longer reliant on a handful of closed platforms.



Problem

The DSA's tiered liability system exempts neutral hosting providers from liability for user-generated content, provided they are unaware of any unlawful content. If they become aware of such content, they must block or remove it promptly (the so-called 'notice and take-down' procedure). This system is specifically designed to ensure free internet communication and is established in a similar form in liberal democratic states around the world.

For about a year now, there have been calls to restrict or abolish this liability exemption – for example, so that platforms are held liable for the content they disseminate in the same way as newspaper publishers. Any change involves risks: An extension of liability – particularly under criminal and administrative law – in connection with the neutral provision of internet communication infrastructure may profoundly infringe upon the constitutionally protected freedoms of communication. If platforms were to be held liable for third-party content, this could create incentives to block even lawful expressions as a precautionary measure, as well as undermine the carefully balanced European framework of liability.

Recommendation

The legal policy proposals to amend the existing DSA liability provisions are to be subject to academic scrutiny and supported by thorough impact assessments.

Effect

Should these calls lead to a debate on amending the DSA's provisions on liability in the context of the protection of children and young people, this debate will be supported by scientific impact assessments. This makes it possible to assess the implications of an extension of liability for the constitutionally protected freedoms of communication prior to any potential reform.



4.7 Research

The development of effective measures to protect children and young people in the media requires a knowledge base that is continuously updated and empirically sound. This includes findings on the importance of media for children, young people and families in everyday life; the media behaviour and online experiences of children and young people; the role of parents in media education; and the effectiveness of specific measures designed to protect, empower and support them. Furthermore, research is needed into psychological stress, sleep and other somatic disorders, media addiction, and neurocognitive developmental factors. There is therefore a need for nuanced research approaches, in particular interdisciplinary, multi-methodological and long-term studies that examine young people's media behaviour within the contexts of their lives, whilst also analysing the effects of platform architectures, specific features, algorithmic recommendation systems and AI-supported functions.

The growing prevalence of personalised, AI-powered and data-driven media services is placing new demands on research. In order to assess the opportunities, risks and challenges of digital media environments appropriately, it is necessary to combine quantitative, qualitative and ethnographic research approaches, whilst also incorporating suitable behavioural data – for example, in the form of usage data collected on end devices or data donations provided in compliance with data protection regulations. Research on the effects of contemporary media must take into account changing usage patterns, personalised media environments and different contexts of use.

The findings are to be systematically incorporated into regulation, supervision, education and support systems. Research and support for innovation also make an important contribution to the development of trustworthy digital infrastructures and European alternatives.

RA 52 Promote research into how children and young people engage with the media

Problem

There are numerous initiatives aimed at promoting media literacy and supporting parents, but they vary in quality. High-quality programmes require an in-depth understanding of the needs that children and young people associate with digital media. Because research is often expected to deliver rapid or representative results, meaningful, qualitative foundational research has so far received very little funding.

Recommendation

Funding should be provided for basic research into the significance of digital and social media for children and young people. It should not view media behaviour in isolation, but should place it in the context of the real-life experiences of young people, ideally through long-term or panel studies, in order to respond to developments in the media market.

Responsibility for this task lies with the federal government, through the research funding provided by the relevant ministry.

Effect

This will provide a sound scientific foundation on which to develop tailored programmes to promote media literacy and support parents in their role in media education. This enables measures to be tailored to the actual needs of children and young people.



RA 53 Launch a research initiative into the mechanisms of action in social media and AI applications

Problem

There is a lack of independent, long-term and interdisciplinary research into the effects of digital media – including at a young age – in general, and social media in particular, as well as individual design elements. There is a need for studies that combine platform data, surveys, experiments and developmental psychology research across different age groups. In this context, prospective longitudinal studies are particularly important, as they follow the same children and young people over extended periods of time, thereby revealing developmental trajectories rather than merely providing snapshots. In addition, experimental designs are needed to go beyond mere correlations and rigorously test the actual effects of individual design elements. This is all the more true when it comes to the implications of artificial intelligence. Furthermore, there is as yet very little scientific evidence available on effective interventions for parents and professionals. A prerequisite for all of this is reliable access to platform data for research organisations: The effectiveness of the access to research provided for in the DSA depends on clear procedures, sufficient resources and consistent enforcement.

Recommendation

A comprehensive research initiative into the impact of digital and social media, as well as AI systems, is to be launched, featuring a multi-year funding programme and function-specific research into recommendation systems, generative AI, chatbots, deepfakes and protective mechanisms. Independent, data protection-compliant access to research under Article 40 of the DSA is to be effectively organised with clear deadlines, standards and secure research environments. The findings are to be implemented in regulatory oversight, legislation and practice.

The EU, the federal government, the federal states and local authorities are all involved.

Effect

This will create a robust, independent and sustainable knowledge base for the protection of children and young people in the digital media environment. Policy-makers, regulators and industry should identify which platform and AI features are risky, protective or conducive to participation and under which conditions, and design measures accordingly.



4.8 Overall governance and involvement

The preceding sections identify who is responsible for individual tasks. However, the recommendations will only be fully effective if they are coordinated, backed by resources, further developed, supplemented and continuously reviewed.

As a cross-functional role, overall management ensures that a common strategy emerges from a multitude of individual measures, that rapid technical developments are continuously supported by expert guidance, and that implementation issues are identified at an early stage. The involvement of children and young people is inextricably linked to this: Measures only reflect the reality of people's lives if those affected are given a say in shaping them. This was once again demonstrated by the participatory process carried out as part of the expert commission's efforts – the discussions, both in the workshops with children and young people and at the hearing on the perspectives of minors, were particularly valuable in shaping the present recommendations for action.

The recommendations in this section establish mechanisms for governance, ongoing guidance and organised participation, thereby ensuring that protection, empowerment and participation do not remain mere intentions, but are translated into effective action.

RA 54 Establish organised participation of children and young people in digital child and youth protection

Problem

Measures to protect children and young people online are still too often developed from an adult's perspective. Participation is particularly necessary where protective measures, information services, complaints procedures, platform rules, regulatory decisions and research directly affect young people. Participation should not be selective or merely symbolic, but should be based on transparent quality standards.

Recommendation

Children and young people should be involved at an early stage, systematically and in a meaningful way as part of the overarching initiative of safeguarding them in the digital sphere. The aim is to build primarily on existing structures, such as the BzKJ Advisory Board, the Youth Council of the Berlin-Brandenburg Media Authority (mabb), the clicksafes Youth Panel, as well as youth organisations, local youth representative bodies, youth welfare organisations and existing platforms for participation run by public authorities and platforms. These and other structures should be used specifically to address issues relating to the digital protection of children and young people, adequately funded, and subject to scientific evaluation and further development. Young people should be provided with clear information, supported in a way that is appropriate to their age and respects diversity, and protected by support measures when dealing with distressing topics. Children and young people taking part should be given a clear explanation of how their contributions have been taken into account.

A coordination centre based at or in the vicinity of an existing institution is intended to bring together participatory initiatives, provide resources, train specialist staff and document results. Reliable funding should be made available for accessible formats, expense allowances, methodological support and evaluation. Platform providers and self-regulatory bodies should commit to transparent procedures for participation.

The parties involved include the EU, the federal government, the federal states, local authorities, regulatory bodies and self-regulatory bodies.

Effect

Measures that are more closely aligned with the target group's everyday reality are more effective and more widely accepted. Risks that remain invisible from an adult's perspective are identified at an earlier stage, and through their involvement, young people develop a sense of self-efficacy as well as media and democratic literacy.



RA 55 Establish and maintain an interdisciplinary panel of experts to analyse and assess current developments in the protection of children and young people in the media

Problem

Rapid technological developments, particularly in the field of artificial intelligence, are constantly presenting new challenges for the protection of children and young people in the media. In this respect, the recommendations of a one-off commission are merely a temporary snapshot of the situation. This is a highly interdisciplinary field, and policymakers and public administrators require ongoing, evidence-based and interdisciplinary counselling in this area.

Recommendation

The efforts of the expert commission, as an interdisciplinary body, has shown that a holistic view of the media reality of young people is necessary in order to draw sound recommendations. At the same time, the issue of protecting children and young people in the media is never-ending. An interdisciplinary panel of experts is therefore to be established and maintained to further develop the protection of children and young people in the media, drawing on perspectives from, amongst others, the fields of regulation, law, technology/IT, media education, children's rights, early education, social work, paediatrics, policing, academia and research. This body is to meet regularly to discuss current challenges relating to the protection of children and young people in the media and the prevention of digital crime, and, on that basis, to draw up policy recommendations and monitor the implementation of the recommended measures. An administrative office is being set up for this purpose. Greater cooperation across different levels, between different stakeholders and across different departments is needed and should be enforced at an organisational level.

This is a matter for the federal government.

Effect

The political and administrative sectors receive ongoing, wide-ranging expert advice that keeps pace with technological developments. New challenges are identified and assessed at an early stage, and the views of children and young people are consistently taken into account.



RA 56 From knowledge to action: Set out an implementation strategy for the digital protection of children and young people

Problem

The protection of children and young people online affects numerous levels and areas: Central government, regional governments, local authorities, schools, youth support services, the health industry, platform regulation, media literacy, parental engagement, research and provider obligations.

Without a common strategy, there is a risk of parallel structures, unclear responsibilities, gaps in implementation and a lack of priorities. Individual recommendations have only a limited impact unless it is specified who is responsible for implementing them, what resources are available and how progress is to be monitored. Practical knowledge and the perspectives of children and young people are often only taken into account at a late stage. In some cases, problems with implementation only become apparent once laws, programmes or support measures have already been adopted.

Recommendation

Once finalised, the individual recommendations for action put forward by the expert commission will be incorporated into a coherent overall strategy for the digital protection of children and young people within the meaning of Section 17a(2)(1) of the Youth Protection Act (JuSchG).

This strategy must – based on the proposals of the expert commission – address the various target groups (the federal government, the federal states, local authorities, schools, youth welfare services, the health industry, police and public safety authorities; platforms, parents, professionals, as well as children and young people), with clear roles, responsibilities and implementation pathways for each.

To implement this, an immediate action plan running until the end of 2026, consultation and implementation mechanisms, a digital feedback channel and a mandatory impact monitoring system are to be put in place. The aim is to translate recommendations into effective measures in a swift, learning-oriented and practical manner, thereby making the protection of children and young people in the digital world a model for impact-driven government action.

Effect

The overall strategy translates technical recommendations into concrete measures quickly and reliably. Clear responsibilities and shared priorities prevent overlap and close gaps in implementation. The levels and institutions involved are given a common framework and can allocate resources in a more targeted manner. Design and implementation workshops link political decisions with practical experience at an early stage.

Problems and obstacles become apparent more quickly, measures can be adjusted in a timely manner, and successful solutions can be applied to other areas. Public monitoring creates transparency and increases political accountability. The involvement of children and young people also strengthens the strategy's practical applicability and legitimacy. This creates a learning-based implementation system that turns protection, empowerment and participation into effective government action on a long-term basis.



5. Conclusion and overview

The efforts of the expert commission has made it clear that the issue of growing up safely in the digital world is neither a purely technical challenge nor an exclusively educational or legal one. It is a task that requires the collective participation of every member of society. Effective protection of children and young people in the digital age requires cooperation between the political sphere, the business sector, educational institutions, child and youth welfare services, the health sector, academia, civil society and, last but not least, children, young people and their families.

From the Commission's perspective, the triad of protection, empowerment and participation forms the normative and technical framework for the further development of child and youth protection in the digital world. Protection remains essential, particularly in situations where children and young people are exposed to risks, abuse or manipulation. At the same time, protection alone is not enough. Young people need to acquire the skills they require to use digital technologies in a self-determined, critical and responsible manner. The opportunity to actively use digital spaces, help shape them and participate in social developments is equally important.

The Commission views children and young people not merely as worthy of receiving protective measures, but as individuals with their own rights who are free to actively shape their own lives. Their perspectives, experiences and interests must therefore be systematically incorporated into political decisions, regulatory processes and the development of digital services.

The discussions held by the Commission have also shown that there is no shortage of knowledge, commitment or successful individual initiatives in Germany. In many areas, there are already sound structures and effective approaches in place. The key challenge, rather, is to ensure that tried-and-tested solutions are sustained in the long term, to expand their reach and to improve cooperation between the stakeholders involved. Sustainable child and youth protection is not achieved through a multitude of new, isolated measures, but through the consistent development, consolidation and integration of existing structures.

The Commission is keeping a particularly close eye on the rapid developments in the field of AI. Generative AI and increasingly autonomous systems will profoundly change the lives of children and young people in the coming years. They open up new opportunities for education, support and social participation, whilst at the same time raising fundamental questions about transparency, accountability, protection and self-determination. These developments must not be addressed only once the risks have materialised. The protection of children and young people must be an integral part of technological innovation and the shaping of digital policy from the outset.

These recommendations are therefore not intended to mark the end of a debate, but rather as the starting point for a long-term process. Digital environments are constantly changing. That is why child and youth protection, media education and participatory structures must

also remain adaptable. Regular evaluation, scientific monitoring, cross-level and cross-departmental cooperation, and the ongoing involvement of children and young people are key prerequisites for sustainable future development.

The key message of this report is: The digital world must be shaped by the rights, needs and the opportunities for development of children and young people – not the other way round. As a society, we bear joint responsibility for this.

Germany has the technical, institutional and social conditions necessary to successfully tackle this task. The task now is to take the necessary steps and make the protection of children and young people an integral part of shaping the digital world.

6. Appendices

6.1 Appendix A – List of recommendations for action

HE 1	Launch the national awareness campaign ‘For the Sake of Our Children’ ____	28
HE 2	Provide reliable counselling and support to families before the child is born and during the first few months of the child’s life _____	29
HE 3	Expand, strengthen and raise the profile of local organisations offering media literacy programmes _____	30
HE 4	Raise awareness amongst parents and families about the responsible use of images of children and young people online _____	31
HE 5	Design inclusive parental counselling and education: practical for everyday use, multilingual and accessible _____	32
HE 6	Facilitate discussion amongst parents on media education – ensure the continuity of effective projects _____	33
HE 7	The legal framework for parental guidance on media use under family law (Section 1631 of the German Civil Code (BGB), Section 1626 of the German Civil Code (BGB)) _____	34
RA 8	Make media education a mandatory component of the initial and continuing professional development of early education professionals ____	36
RA 9	Establish media education as a compulsory component of degree programmes and training courses in education and social work _____	37
RA 10	Reinforce digital education in primary schools – make use of general studies and afternoon sessions _____	38
RA 11	Strengthen children’s self-regulation skills within the family, in childcare centres and at school _____	39
RA 12	‘AI Seahorses’ – Promote a basic understanding of AI _____	40
RA 13	Promote algorithmic and AI literacy in an educational context (AI Literacy) _____	41
RA 14	Identify a contact person with expertise in media education to deal with pupils’ media-related enquiries _____	42
RA 15	Strengthen media literacy in lower and upper secondary education through (peer-to-peer) programmes _____	43
RA 16	Regulate the private use of digital devices in schools _____	44
RA 17	Media literacy and prevention from an early age: strengthen the potential of early childhood support services and childcare centres ____	46
RA 18	Promote alternative forms of recreational activity and volunteering _____	47
RA 19	Integrate media education and democratic education _____	48

RA 20	Establish safer spaces for young people to help them recognise online phenomena and develop strategies for dealing with them _____	49
RA 21	Centralise and make age- and development-specific approaches to promoting media and digital literacy accessible _____	50
RA 22	Strengthen the promotion of media literacy in the educational protection of children and young people _____	51
RA 23	Expand media education in schools by strengthening school social work ____	52
RA 24	Make the use of age ratings for games and other content in youth welfare services more flexible _____	54
RA 25	Develop a tiered prevention system with more tailored support for vulnerable children and young people _____	56
RA 26	Introduce uniform standards for the diagnosis and treatment of behavioural addictions and addictive behaviour _____	57
RA 27	Expand a tiered approach to universal, selective and targeted prevention measures against excessive use and addiction _____	58
RA 28	Taking an approach to media and health that sees both as two mutually inclusive concepts _____	59
RA 29	Strengthen and improve access to support services for children and young people _____	60
RA 30	Provide easy access to medical and psychological support for digital-related stress _____	61
RA 31	Strengthen digital policing _____	63
RA 32	Children's Online Helpline – establish a nationwide reporting and information centre for the public safety authorities to deal with cases involving minors _____	64
RA 33	Consistently combat depictions of sexual violence _____	65
RA 34	Combat digital sexual offences through police 'undercover child' operations _____	66
RA 35	Develop standardised criteria and data exchange for depictions of sexual violence _____	67
RA 36	Risk- and design-oriented regulation – two alternatives: a statutory minimum age limit (13 years) and job-specific age limits _____	69
RA 37	Safe and age-appropriate default settings and design requirements for young people's accounts – ensure child protection 'by design' and 'by default' _____	72
RA 38	Introduce binding regulations for effective and data-protection-compliant age assessment whilst safeguarding fundamental rights _____	75

RA 39	Ensure users have greater control over recommendation systems and content _____	78
RA 40	Close existing security gaps in the DSA: Amendments to the regulations for small and micro-enterprises _____	79
RA 41	Protect children's privacy – warnings from service providers regarding the uploading of photos of children _____	80
RA 42	Deal responsibly with children's images in public institutions _____	81
RA 43	Child and Family Influencing: Empower parents in their role as guardians and establish a binding framework _____	82
RA 44	Extend the scope of usage risks in the JuSchG and JMStV to cover AI-related issues _____	84
RA 45	Improve protection against malicious deepfakes and deepnudes _____	85
RA 46	Risks posed by AI companions: Introduce an age limit as an immediate measure _____	86
RA 47	Expand and further develop child-friendly online services _____	87
RA 48	Develop child-friendly AI as part of the EU's digital sovereignty _____	88
RA 49	Industry certification for toys: Develop 'child-safe AI' alongside an information campaign _____	89
RA 50	Create incentives for trustworthy European platform and data infrastructures _____	90
RA 51	Conduct a scientific review of political demands regarding DSA liability _____	91
RA 52	Promote research into how children and young people engage with the media _____	93
RA 53	Launch a research initiative into the mechanisms of action in social media and AI applications _____	94
RA 54	Establish organised participation of children and young people in digital child and youth protection _____	96
RA 55	Establish and maintain an interdisciplinary panel of experts to analyse and assess current developments in the protection of children and young people in the media _____	97
RA 56	From knowledge to action: Set out an implementation strategy for the digital protection of children and young people _____	98

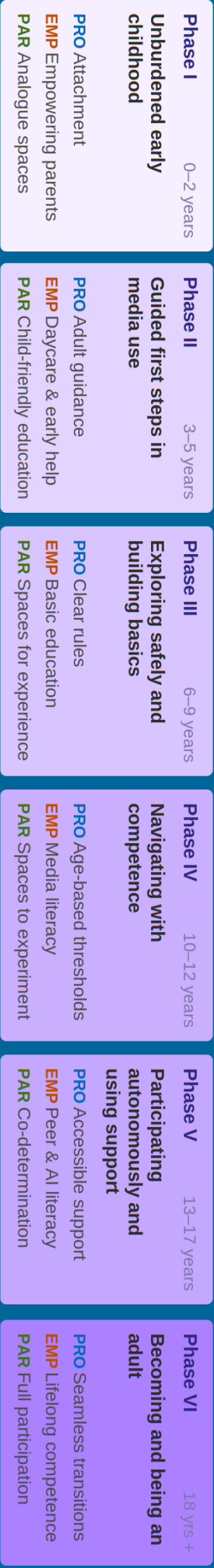
6.2 Appendix B – Strengthening development, taking responsibility

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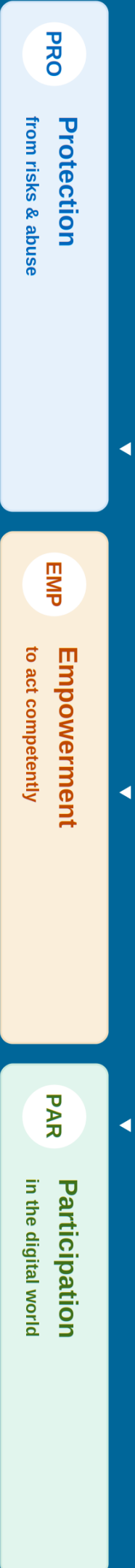
STRENGTHENING DEVELOPMENT, TAKING RESPONSIBILITY

For children and young people to grow up well in the digital world

1 Development-oriented perspective · the biography of young people at the centre



Measures interlock and are usually needed across several phases



2 Responsibility-based model · many actors – shared responsibility



6.3 Appendix C – Glossary of key terms

5C typology: an internationally compatible classification model for the systematic identification and assessment of online risks to children and young people. It distinguishes between five interrelated risk areas based on the source of the risks and the role in which minors are affected: through potentially harmful content (Content), through one's own or reciprocal behaviour (Conduct), through problematic or inappropriate contacts (Contact), through commercial, financial or contractual practices (Consumer), and through factors that cut across all risk areas (Cross-cutting).

Age assurance: refers to methods for estimating or verifying the age of users of digital services. The aim is to protect children and young people from content, products or interactions that are unsuitable for their age.

AI companions: digital chatbots that simulate natural, human-like conversations. They can take on a variety of roles – from virtual friends and romantic partners to personal assistants and coaches.

Algorithmic recommendation systems: analyse users' behaviour and, on that basis, suggest content, contacts or products. They have a significant influence on the way information and media are used on social networks, video-sharing sites and search engines.

Age verification: A process by which a person's age is verified as accurately as possible, for example through identification documents or certified proof of identity (see also Age Assurance).

By design: refers to the mandatory incorporation of specific protection, safety or quality requirements right from the conception and technical design stage of a product or service.

By default: means that the relevant privacy or security settings are automatically set by default and apply without any action being required on the part of users.

Cyberbullying: refers to the deliberate and repeated harassment, intimidation, humiliation or exclusion of a person via digital media (e.g. via social media, messaging services or online platforms).

Cybergrooming: refers to the act of targeting children via digital media with the aim of facilitating sexual abuse or exploitation. In Germany, cybergrooming is a criminal offence only in relation to children. However, the approach behind this poses a significant risk to both children and young people.

Dark Patterns: Digitally designed user interfaces specifically crafted to steer or manipulate users towards certain decisions. Examples include hidden cancellation options, misleading consent requests or particularly eye-catching buttons for certain actions.

Data literacy: refers to the ability to understand, critically evaluate, interpret and use data responsibly. This is becoming increasingly important, particularly in the context of data-driven platforms and artificial intelligence.

Deep nudes: are images or videos generated or manipulated using artificial intelligence that depict people as appearing naked or wearing sexually suggestive underwear, even though no such images or videos have ever existed. The creation and distribution of such images may infringe on personal rights and cause significant psychological harm.

Deepfakes: are fake images, videos or audio recordings of people created using generative AI tools. Deepfakes are particularly problematic when they are used by extremist groups, for example to turn society against individuals or groups of people and to incite hatred. Deepfakes are often difficult to spot.

Disinformation: refers to the deliberate dissemination of false or misleading information with the aim of deceiving people or influencing public opinion and decision-making. Digital platforms can facilitate the rapid spread of disinformation.

Digital Services Act (DSA): An EU regulation that sets out uniform obligations for digital services and online platforms. In particular, it is intended to improve the handling of unlawful content, increase the transparency and accountability of service providers, and strengthen the security and fundamental rights of users in the digital space.

Digital literacy: refers to empowering people to use digital technologies and spaces safely, critically, responsibly and autonomously, to recognise risks, and to participate actively in a digitally shaped society.

Digital crime prevention: refers to all preventative measures aimed at preventing crime in the digital space, identifying risks at an early stage, reducing opportunities for crime, and empowering users to behave safely in digital environments.

Digital policing: covers the full range of policing activities in the digital sphere, using digital technologies, and in relation to digitally facilitated criminal phenomena and threatening situations.

Digital inclusion: refers to the ability of all people to use digital technologies and online services on an equal footing and to participate in social, cultural, economic and political life.

Educational privilege: refers to the constitutionally protected right and duty of parents to bring up their children and to make decisions regarding key aspects of their upbringing. It reaches its limits where the child's welfare is at risk or where the state's duty to protect them comes into play.

EUDI wallet (European Digital Identity Wallet): an app developed by the government and the EU to enable users to prove their identity online. ID cards, driver's licences and other forms of identification are bundled together within the app. The app enables cross-border verification within the EU without disclosing sensitive data. The app is expected to be available to members of the public as of 2027.

Generative AI: refers to systems that can autonomously generate new content, such as text, images, videos, music or programme code, based on large amounts of data. Well-known examples include ChatGPT, Gemini and Claude.

Hash value: an encrypted string which – much like a fingerprint – enables a file to be identified. Whilst hash functions such as the Secure Hash Algorithm (SHA) are only suitable

for identifying identical files, so-called fuzzy hashing also allows for the identification of similar files (e.g. slightly modified images).

ICD-11 (International Classification of Diseases, 11th Revision): the World Health Organisation's current international classification of diseases and health problems. It serves as the basis for diagnosis, documentation, research and health reporting worldwide, and, for the first time, also includes specific diagnoses relating to behavioural addictions.

AI agent: An AI system capable of carrying out tasks independently, preparing decisions or managing digital processes. Unlike traditional chatbots, it operates semi-autonomously and can carry out several tasks without immediate human intervention.

AI companion: a digital conversation or interaction partner based on artificial intelligence that communicates with users over an extended period of time. Such systems can fulfil social, emotional or advisory functions and, particularly for children and young people, present opportunities but also risks in terms of emotional attachments and dependencies.

AI literacy: encompasses the ability to use artificial intelligence applications appropriately, critically and responsibly. This includes an understanding of how AI systems work, as well as their opportunities, risks, limitations and potential errors.

Media literacy: describes the ability to use media and digital technologies critically, thoughtfully, confidently and responsibly. These include the evaluation of information, the protection of personal data and the competent use of digital tools.

Online risks: these include potential dangers that children and young people may encounter in the digital world. These include, amongst other things, cyberbullying, cybergrooming, disinformation, hate speech, fraud, data breaches, and content that is problematic or harmful to the development of children.

Digital community policing: refers to a community-focused and preventative form of policing in the digital sphere. In this context, the fundamental principles of community policing – such as building trust, prevention efforts and easy accessibility – are applied to digital communication spaces such as social media and online games. The aim is to maintain a presence in the digital space and to be open to cooperation, so as to identify security issues at an early stage, take preventative measures and develop solutions together with the community.

Parental Consent: refers to the consent given by parents or legal guardians for minors to use certain digital services. Under European data protection law, parental consent plays a particularly important role in the processing of children's personal data.

Personalisation: refers to the tailoring of digital content, advertising or services to users' individual characteristics, interests or behaviour. It can improve user-friendliness, but it also poses risks to privacy and freedom of expression.

Phubbing: a combination of the English words 'phone' and 'snubbing'. Refers to the behaviour of ignoring other people in social situations because one's attention is focused on a smartphone or other digital devices. Phubbing can damage interpersonal relationships and exacerbate feelings of social exclusion.

Platform regulation: encompasses legal and regulatory measures that require digital platforms to mitigate risks, protect users' rights and ensure transparency regarding how they operate.

Sexting: refers to the sending or receiving of messages, photos or videos of a sexual nature via digital media. This can give rise to risks if such content is shared without consent.

Sharenting: refers to the practice of parents or guardians posting information, images or videos of children on social media or other digital platforms. Whilst this may offer opportunities for exchange and networking, it also raises questions regarding data protection, privacy and children's rights.

Stepped-care approach: A treatment approach aimed at providing patients with the most effective intervention in each case, whilst at the same time ensuring it is the least resource-intensive. The level of support is gradually adjusted to reflect the severity of the symptoms.

6.4 Appendix D – List of abbreviations

AI	Artificial Intelligence
AVMSD	Audiovisual Media Services Directive
BGB	German Civil Code
BMBFSFJ	Federal Ministry of Education, Family Affairs, Senior Citizens, Women and Youth
BMJV	Federal Ministry of Justice and Consumer Protection
BzKJ	Federal Centre for the Protection of Children and young people in the Media
DiGA	Digital health application
DSA	Digital Services Act
EC Directive	E-Commerce Directive
EU	European Union
EUDI Wallet	European Digital Identity Wallet
ECJ	European Court of Justice
HE	Recommendation for action
ICD-11	International Classification of Diseases, 11th Revision
IT	Information technology
JArbSchG	Youth Employment Protection Act
JMStV	State Treaty on the Protection of Minors in the Media
JuSchG	Youth Protection Act
AI	Artificial Intelligence
AI Regulation	EU Regulation on Artificial Intelligence
NRW	North Rhine-Westphalia
SGB VIII	Social Code – Book Eight: Child and Youth Welfare
UN	United Nations
UN CRC	UN Convention on the Rights of the Child
WHO	World Health Organization

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