

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

SUMMARY | EXECUTIVE SUMMARY

June 2026

The Commission at a glance

The Commission of Independent Experts on the Protection of Children and Young People in the Digital World was established in September 2025 by Federal Minister Karin Prien (BMBFSFJ). In accordance with the coalition agreement, the risks, challenges and opportunities presented by digital technologies should be analysed and translated into specific recommendations for action. She worked independently, in an interdisciplinary manner and on an empirical basis. The perspectives of children and young people, as well as those of various experts, were taken into account to a great extent. The Commission is now putting forward recommendations based on a model focused on development and accountability.

These 56 recommendations for action (RFA) build on the review published on 20 April 2026. [Review of the Current Situation](#). They are not a list of individual measures, but rather a cohesive overall plan. Some HE measures can be implemented in the short, medium or long term. They address a range of stakeholders and levels, such as federal and state legislators, cooperation between the federal and state governments, local authorities and European regulation, as well as parents, schools and the health system. A final report will be published in mid-September 2026.

Recommendations for action: Basic Concepts and Guiding Principles (Chapter 2)

Children's rights apply to the full extent in the digital environment too (UN Convention on the Rights of the Child, General Comment No. 25). Digital transformation does not alter their validity, but it does change the conditions under which they are implemented. The recommendations take a proactive approach.

The triad: Protection, empowerment and participation

Protection proactively mitigates risks and provides effective support. **Empowerment** fosters knowledge, sound judgement and self-regulation. **Participation** ensures access, freedom of expression and a say in decision-making. The three dimensions are interdependent: Protection must not result in blanket exclusion; empowerment must not shift structural responsibility onto children; and participation must not mean leaving young people to fend for themselves.

The catalogue of recommendations is based on five guiding principles of recommendations

1. **Building on, scaling up and reinforcing** what has been proven to work – utilising, expanding and securing the long-term future of tried-and-tested structures (early intervention, educational youth protection, school social work, successful projects and initiatives) rather than introducing new, temporary measures.
2. **Trust and flexibility on the front lines** – creative freedom within a reliable framework. In particular, schools cannot take on new tasks indefinitely.
3. **A community of responsibility** – responsibility that is binding and shared. Structural risks must not be passed 'down' onto children or parents.
4. **Effectiveness through coordination** – reducing friction between federal government, the federal states and local authorities, as well as actors in the field and supervisory bodies.
5. **A future-oriented approach to AI** – (generative) AI as a cross-cutting issue. Shaping opportunities and risks from the outset, guided by the precautionary principle.

The key element: Two perspectives on the recommendations

Both perspectives examine the same subject and answer two questions: **What** do children need at the various stages of their upbringing – and **who** is responsible for this? A purely institutional framework does not adequately reflect the reality of young people's lives. An analysis focused solely on development leaves open the question of who must take action. This approach combines both perspectives with the triad and the levels of regulation.

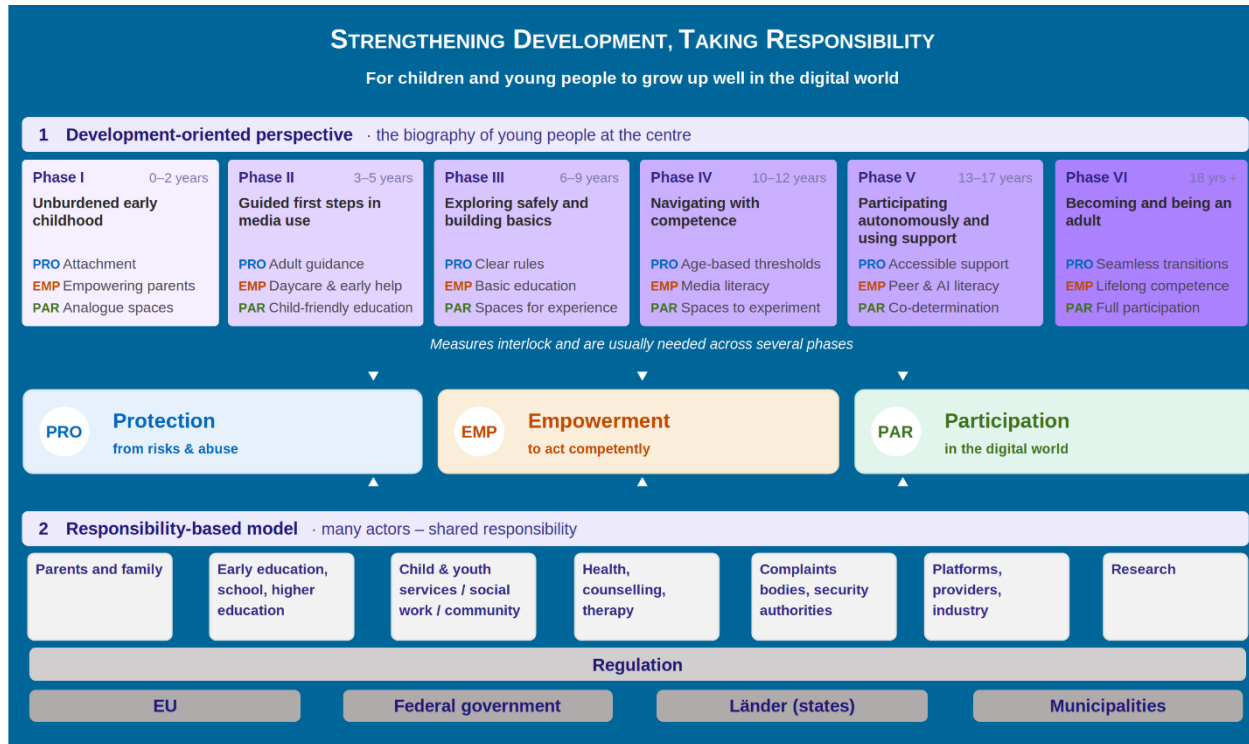


Diagram 'Strengthening development, taking responsibility' (Figure 2 / Appendix B of the full document)

A development-oriented perspective – focusing on the individual's life story (Chapter 3)

This approach follows the life course of young people and categorises the recommendations into six life stages as well as overarching levels. It highlights how needs for protection, capabilities and participation are changing. Measures should be introduced at an early stage, build on one another and not be discontinued at points of transition.

- **Phase I: 0–2 yrs – Protecting children at the earliest stage:** Shaping bonds and closeness. This course is aimed at parents (e.g. RA 2: Provide reliable counselling to families before the child is born).
- **Phase II: 3–5 yrs – Guided introduction to media:** A hands-on, explanatory approach as opposed to the previous focus on personal use (e.g. RA 17: (Reinforce early intervention and nurseries).
- **Phase III: Ages 6–9 – Exploring safely, learning the basics:** Building a solid foundation in primary schools (e.g. RA 10: Reinforce digital education in primary schools, RA 12: "AI Seahorses" – Promote a basic understanding of AI).
- **Phase IV: Ages 10–12 – Confident navigation of the digital world:** Guided experimentation, learning mechanisms and rules (e.g. RA 20: Create safer spaces for young people, HE 47: Expand and further develop online services suitable for children).

- **Phase V: Ages 13–17 – Participating independently and safely, and making use of support:** Self-determination with accessible support. Obligations of providers (e.g. RA 37: Secure and age-appropriate default settings and design requirements, RA 29: (Reinforce and make support services for children and young people more accessible).
- **Phase VI: 18 yrs and over – Growing up and coming of age:** Measures should have a lasting effect, and transitions should be seamless.

Across all phases: Platform responsibility, regulation, law enforcement, health, oversight and research form a framework that encompasses the entire course of a child’s life – ensuring that protection does not depend solely on the vigilance of one single individual (e.g. RA 33: Consistently combat depictions of sexual violence, RA 53: Launch a research initiative into the mechanisms of action in social media and AI applications).

Responsibility-based model – Who needs to take action? (Chapter 4)

The responsibility-based model assigns each recommendation to the party with **primary responsibility**. Collaboration with other stakeholders and at other levels is often useful and necessary. Eight stakeholder groups – listed in no particular order – form the framework of the model:

- **Parents and family:** they provide guidance and support – and to do so, they need reliable, easily accessible support.
- Early education, elementary and secondary school, higher education: reaching all children and equipping support staff with the necessary skills. Can bridge differences.
- **Child and youth Services / Social Work / Community:** reaching particularly vulnerable groups through relationship-building and easily accessible services.
- **Health, counselling, therapy:** reaching families at an early stage and building trust. A tiered approach to prevention and support that does not stigmatize normal use.
- **Complaints offices, specialist agencies and public safety authorities:** these should function as a coherent protection and intervention framework with clear reporting channels.
- **Platforms, service providers and industry leaders:** they bear responsibility where risks are inherent in the product design itself.
- **Research:** provides the empirical foundation of knowledge, which must be continually developed.
- **Overall governance and involvement:** integrates individual measures into a strategy and ensures its implementation and further development.

How the two models intersect: The development-oriented perspective shows when and in what context a measure is significant. The responsibility-based model shows who is responsible for implementing them. Each recommendation includes details of the stage and the responsible party. These are complemented by the regulatory levels of the EU, the federal government, the federal states and local authorities.

14 selected recommendations in detail (Chapter 4)

The following recommendations serve as examples to illustrate what the core issues are and what their intended effects are. All 56 recommendations for action are set out in detail in the full document.

Supporting parents and families (Chapter 4.1)

RA 2: Provide reliable counselling and support to families before the child is born and during the first few months of the child's life. If digital media are used to soothe or entertain children in their early years, there is a risk of sensory overload, early dependence on the rewards of media use, and a diminished capacity for emotional connection. Intensive, distracting media use by parents (phubbing/technoference) also poses risks to children's development. There is a lack of compulsory counselling that reaches all families at this early stage. Parents should therefore be provided with reliable counselling, both before and after the child is born, on how to manage their use of digital media during the first three years of their life (such as through the existing 'Screen-free until 3' initiative) – via trusted channels such as midwives, paediatricians, early intervention services and nurseries, supplemented by outreach services and supported by adequately staffed and qualified personnel.

→ This reduces screen time during the early years of the child's life. Parents reflect on their own media use and are empowered to protect their children from negative consequences.

RA 7: The legal framework for parental guidance on media use under family law (Sections 1631 and 1626 of the German Civil Code (BGB)). Children are growing up in digitalised environments, yet the law on child welfare has not yet explicitly addressed the risks associated with their digital development and protection. As with the introduction of non-violent parenting in 2000, the legislature should extend the child's right to care and upbringing to include protection against neglect, including digital neglect; enshrine the child's capabilities and needs while growing up in the digital sphere; and establish a framework for parental responsibility in their digital education.

→ Its inclusion in the German Civil Code sends a clear message, sparks a public debate and provides guidance for responsible media education that is appropriate to children's developmental stages.

Building expertise with qualified specialists (Chapter 4.2)

RA 12: 'AI Seahorses' – A basic understanding of AI. The EU AI Regulation requires educational and youth welfare organisations to familiarise both staff and children with the use of AI – an obligation that many find overwhelming. The aim is to introduce a compulsory, child-friendly certificate on the opportunities and risks of AI, which can be obtained online, initially for primary school-aged children. A federal start-up service organises the procurement, whilst the federal states are responsible for allocation; an 'Expert Council on AI and Children' oversees the ongoing development of the content. Institutions thus fulfilling their legal obligation.

→ Children acquire a basic understanding at an early age, which serves as the foundation for using AI competently.

RA 15: Strengthen media literacy in lower and upper secondary education. The level of media literacy among older pupils varies, and effective, scientifically validated 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. Scientifically evaluated programmes are recommended: With support from the federal government, the federal states should set up a database or platform of approved programmes, provide sufficient staffing resources, and ensure that records are kept of which programmes schools are using.

→ In every country, pupils are reliably provided with opportunities to develop their media literacy; accredited programmes are becoming more widespread; and younger teenagers benefit from the knowledge and credibility of their older peers.

RA 16: Regulate the private use of digital devices in schools. The use of personal devices in class is a major distraction, hinders the creation of a focused learning environment and restricts social interaction during breaks – and in situations of bullying, it can exacerbate the problem. At the same time, the regulations currently vary considerably between federal states and types of school. The imposing of significant restrictions is recommended: 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 draw up binding usage plans with the involvement of the pupils.

→ Pupils are able to concentrate better and have reliable access to digital learning resources, whilst break times are once again providing opportunities for face-to-face social interaction.

Health and protection against assault *(Chapter 4.4 and 4.5)*

RA 28: Take an approach to media education and health that sees both as two mutually inclusive concepts. 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. To date, there has been no compulsory guidance on media use that reaches every child within the framework of preventive healthcare. For this reason, counselling on media use and media literacy should be made a mandatory part of routine health check-ups. Paediatricians, as trusted figures, should make use of early preventive check-ups and the pre-school medical examination to address media use, problematic use and the risks of addiction, and to encourage non-digital recreational activities.

→ Health risks are identified, and families given reliable counselling, at an early stage.

RA 32: Children's Online Helpline – a nationwide reporting and information centre. To date, children and young people have not had easy, age-appropriate access to support from the public safety authorities. Existing online monitoring centres are tailored to adults, focused on formalities and fragmented across the federal system, and the obstacles to participation are high. The federal government and the federal states should jointly establish a nationwide, child-friendly reporting and referral centre – with an age-appropriate design, direct communication (such as via chat), continuous educational support, adequate funding and coordination with the EU.

→ Children report risks and offences more quickly and without significant obstacles; the willingness to report incidents increases, help is provided sooner, and those affected are referred to the support system more reliably.

Imposing binding obligations on platforms and providers *(Chapter 4.6)*

RA 36: Risk-based and design-based regulation – two alternatives. Many of the risks on social media platforms are exacerbated by the way in which they're designed (algorithmic feeds, endless feeds, manipulative designs and notifications). Article 28(1) of the DSA remains too general, and there is a lack of effective age verification measures. At the same time, uniformly high minimum age limits (15/16 years) fall short because they treat very different services in the same way, hinder participation and encourage circumvention. The Commission recommends that Article 28(1) of the

DSA be set out in binding terms, with clear protection requirements for each age group, service and role, and proposes two options:

- **Option 1:** a statutory minimum age limit of 13 for social media accounts, with effective age verification and tiered protection standards for the 13–16 and 16–18 age groups.
- **Option 2:** no standard age limit, but rather service- and role-specific restrictions based on a risk assessment of the service in question (e.g. algorithmic feeds, open contact features, live streams).

The following applies to both: unilateral national measures should be avoided (country-of-origin principle, a largely harmonised Digital Services Act) and children should not be held personally responsible for using services that lack adequate safeguards.

→ The regulation focuses on the risks and the providers responsible.

RA 37: Ensure that child protection is built in by design and by default. A significant proportion of the risks do not stem from individual content, but from the design of the services (algorithmic feeds, dark patterns, risky default settings). For accounts held by minors, a binding set of standard secure default settings should apply: no algorithmic feeds and no personalised advertising; a ban on features that encourage addictive behaviour and manipulative design patterns (endless feeds, autoplay, ‘confirmshaming’, etc.). Effect: Protection is shifting from individual competence to the structural level – it operates regardless of how media-literate parents or young people are, provides clarity on standards and takes the pressure off parents.

→ Service providers are responsible for the design of their products – and therefore also for ensuring that minors can navigate their digital spaces safely.

RA 38: Effective age verification that complies with data protection regulations. Age verification is becoming increasingly important – particularly where minimum age limits apply – but there are no binding guidelines, meaning that platforms are largely free to decide for themselves. Biometric or behaviour-based methods pose a threat to privacy and self-determination. The EU and the federal government should determine, on a risk-based basis, which procedures are permissible, with clear minimum technical requirements: No link between the issuer and the verifier, selective disclosure (only if an age limit has been reached), processing of biometric data exclusively on the end device, and no further use of the data for advertising or tracking.

→ Binding standards that safeguard fundamental rights create legal certainty and prevent platforms from making arbitrary decisions on procedures that are particularly relevant to fundamental rights.

Regulating artificial intelligence with a view to the future *(Chapter 4.6)*

RA 44: Extend the scope of usage risks in the JuSchG and JMStV to include AI-related risks. 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 functions such as image-generating AI or communication with chatbots. This gives rise to legal uncertainty in supervisory and rating procedures. The risks associated with use, as set out in the Youth Protection Act and the State Treaty on the Protection of Minors in the Media, are therefore 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.

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

RA 46: AI Companions – Age limit as an immediate measure. AI Companions are designed to foster emotional closeness and bonding through ongoing, personalised interaction. Vulnerable young people, in particular, are at risk of developing parasocial relationships, emotional dependence and increased psychological stress, whilst the AI Regulation and the DSA have so far failed to adequately address these risks. A statutory age limit of 13 years is to be introduced – preferably at EU level – along with obligations for service providers: reliable age verification, default settings appropriate for young people, protection against emotional dependence, and clearly recognisable warnings that this is not a human relationship.

→ In accordance with the precautionary principle, children will be protected from AI companions that are not age-appropriate; the regulatory gap will be closed; and responsibility will be consistently placed with the providers.

Ensuring participation and implementation *(Chapter 4.8)*

RA 54: Establish a structured system for the participation of children and young people. Children and young people should be systematically and consistently involved at an early stage – primarily through existing structures. Measures that take into account the target group’s everyday reality in this way are more effective and more readily accepted.

→ Risks that are 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 56: From knowledge to action – an implementation strategy. Without a common strategy, there is a risk of parallel structures, unclear responsibilities and gaps in implementation. The 56 recommendations are to be incorporated into a coherent overall strategy with clearly defined roles for each target group – including an immediate action plan running until the end of 2026, frameworks for design and implementation, a digital feedback channel and a mandatory impact monitoring mechanism.

→ The result is a learning-based implementation system that rapidly translates expert recommendations into action, avoids duplication of effort, highlights undesirable developments, and ensures that protection, empowerment and participation are permanently translated into effective government action.

Overview

Ensuring that children grow up safely in the digital world is a task that requires the involvement of society as a whole. Germany is not lacking in knowledge or commitment – the task is to safeguard tried-and-tested approaches for the long term, expand their reach and improve cooperation between the various stakeholders. The framework for digital spaces and AI applications must anticipate risks before they materialize.

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.

The recommendations are not definitive, but rather the starting point for a long-term, adaptive process.

Note: *This summary is not a substitute for the full document. The full set of 56 recommendations for action, including descriptions of the problems, recommendations and expected impacts, the allocation of stakeholders and the full-size diagram, can be found in the 116-page report (list of recommendations in Appendix A, diagram in Appendix B, glossary in Appendix C).*

The full document and further information can be found at:

<https://www.bmbfsfj.bund.de/bmbfsfj/themen/kinder-und-jugend/expertenkommission-kinder-und-jugendschutz-in-der-digitalen-welt>

The full text of all recommendations for action will be published in mid-July, and the final report, together with the supporting documentation, in mid-September 2026.

The list of all HE can also be found on the following pages.

List of all recommendations for action

Parents and family

- RA 1 Launch the national information campaign 'For the Sake of Our Children'
- RA 2 Provide reliable counselling and support to families before the child is born and during the first few months of the child's life
- RA 3 Expand, strengthen and raise the profile of local organisations offering media literacy programmes
- RA 4 Raise awareness amongst parents and families about the responsible use of images of children and young people online
- RA 5 Design inclusive parental counselling and education: practical for everyday use, multilingual and accessible
- RA 6 Facilitate discussion amongst parents on media education – ensure the continuity of effective projects
- RA 7 Parental guidance on media use within the framework of family law (Section 1631 of the German Civil Code (BGB), Section 1626 of the German Civil Code (BGB))

Early education, school, vocational training and higher education

- RA 8 Make media education a compulsory component of the initial and continuing training of specialists in the field of early childhood education
- RA 9 Establish media education as a compulsory component of degree programmes and training courses in education and social work
- RA 10 Strengthen digital education in primary schools – make the most of general studies and afternoon sessions
- RA 11 Strengthen children's self-regulation skills within the family, in childcare centres and at school
- RA 12 'AI Seahorses' – Promote a basic understanding of AI
- RA 13 Promote algorithm and AI literacy in an educational context (AI Literacy)
- RA 14 Identify a contact person with expertise in media education to deal with pupils' media-related enquiries
- RA 15 Strengthen media literacy in lower and upper secondary education through (peer-to-peer) programmes
- RA 16 Regulate the private use of digital devices in schools

Child and youth services and social work

- RA 17 Media literacy and prevention from an early age: strengthen the potential of early childhood support services and childcare centres
- RA 18 Promote alternative forms of recreational activity and volunteering
- RA 19 Integrate media literacy and democratic education

- RA 20 Establish safer spaces for young people to help them recognise online phenomena and develop strategies for dealing with them
- RA 21 Centralise and make age- and development-specific approaches to promoting media and digital literacy accessible
- RA 22 Strengthen the promotion of media literacy in the context of child and youth protection in educational settings
- RA 23 Expand media education in schools by strengthening school social work
- RA 24 Make the use of age ratings for games and other content in youth welfare services more flexible

Health, counselling and therapy

- 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 27 Expand a tiered approach to universal, selective and targeted prevention measures against excessive use and addiction
- RA 28 Take an approach to media education and health that sees both as two mutually inclusive concepts
- RA 29 Strengthen and improve access to support services for children and young people
- RA 30 Provide easy access to medical and psychological support for digital stress

Complaints offices, specialist agencies and public safety authorities

- RA 31 Strengthen digital policing
- RA 32 Children's Online Helpline – establish a nationwide reporting and information centre where the public safety authorities can deal with cases involving minors
- RA 33 Consistently combat depictions of sexual violence
- RA 34 Combat digital sexual offences through police 'undercover child' operations
- RA 35 Develop standardised criteria and data exchange for depictions of sexual violence

Platforms, service providers and the internet industry

- RA 36 Risk- and design-oriented regulation – two alternatives: a statutory minimum age limit (13 years) and job-specific age limits
- RA 37 Safe and age-appropriate default settings and design requirements for young people's accounts – ensure child protection 'by design' and 'by default'
- RA 38 Introduce binding regulations 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 Deal responsibly with children's images in public institutions
- RA 43 Child and Family Influencing: 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 47 Expand and further develop child-friendly online services
- RA 48 Develop child-friendly AI as part of the EU's digital sovereignty
- RA 49 Industry certification for toys: Develop 'child-safe AI' along with an informational campaign
- RA 50 Create incentives for trustworthy European platform and data infrastructures
- RA 51 Conduct a scientific review of political demands regarding DSA liability

Research

- 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

Overall governance and involvement

- RA 54 Establish a structured approach to the participation of children and young people within the sphere of 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



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