

Feedback on the guidelines on protection of minors online under the Digital Services Act

By The Safer Internet Centre Denmark (SIC DK)

General comments

Online platforms are increasingly accessed by minors and can provide many enjoyable and educational experiences, and help explore new and maintain important, social relations. However, there is a great concern – and clear proof – that many online platforms are not safe for minors. The design and features of many online platforms create risks to minors' privacy, safety and security.

In Safer Internet Centre Denmark, we are daily in contact with children, parents and professionals and experience how these risks lead to serious consequences for children's wellbeing and their rights to protection. A recent national representative survey from Save the Children Denmark shows that 69% of children between 9-17-years old have had one or more unpleasant experiences online within the last 12 months.¹

Overall, we in Safer Internet Centre Denmark welcome these guidelines as an important step towards securing children's privacy, safety and security on online platforms. We also find it very positive that the guidelines are rooted in The Convention on the Rights of the Child.

We want to highlight the importance that such guidelines regarding the safety of minors online should be reviewed regularly. Due to rapid developments in this field, a static set of recommendations is not sufficient.

For more information about The Safer Internet Centre Denmark (SIC DK), please see Annex 1.

2.+3. Scope and structure of the guidelines

Regarding Recital 71 of the Regulation, we appreciate the recognition that it is insufficient for a platform to simply claim it is not intended for minors if there is evidence that minors are using it regardless. This is critical in holding platforms accountable for their user demographics.

Furthermore, we strongly encourage expanding the definition of the third scenario to include external scientific evidence demonstrating that minors are using the platform or service. For example, in Denmark 51 % of children aged 9-12 use Snapchat, 27 % of this age group use

¹<https://sletdet.redbarnet.dk/wp-content/uploads/2024/10/Children-and-young-peoples-exposure-to-digital-violations-and-other-unpleasant-experiences-online-2024.pdf>



TikTok and 20 % of this age group use Discord². As an example of external evidence which could serve as such documentation.

We welcome that the guidelines emphasize that adherence to the guidelines does not guarantee compliance with the Digital Services Act (DSA). This is an important point, especially given the evolving nature of digital services (lines 116-128). Additionally, we commend the Commission's acknowledgment that the guidelines are not an exhaustive list, particularly as the digital landscape is constantly changing (line 135). This flexibility is necessary to ensure that the guidelines remain relevant and adaptable to new challenges.

4. General principles:

We welcome the general principles that the Commission outlines. It is very positive that the principles for good practice (lines 159–167) incorporate the UN Convention on the Rights of the Child and integrate a general rights-based perspective into the guidelines. This creates a strong foundation for protecting and promoting children's rights. However, we expect challenges arise when assessing what can be considered age-appropriate design (lines 171–173). We therefore urge the Commission to define age-appropriate design and establish clear evaluation methods to determine when a design meets these criteria. For example, Snapchat features a youthful and intuitive design that appeals to children and young people, yet at the same time, it exploits their concerns and focus on relationships to increase retention on the platform. This raises questions about how age-appropriate design can be assessed and implemented in a way that safeguards children and young people from exploitation.

5. Risk review

We welcome that providers are required to conduct a review, whenever they make significant changes to their platforms (line 198). However, it is essential that these reviews are qualified by external experts and child rights organizations.

Furthermore, we encourage the Commission to define and provide guidance on what exactly constitutes the best interest of children, to ensure that the reviews of the providers are in line with children's rights (line 196). Finally, we call for platforms to be required to publish their risk reviews (line 199).

² Ibid.



6. Service design

6.1 Age assurance

It is a fundamental principle for Safer Internet Centre Denmark, to ensure children's right to participate in safe and child-friendly online environments. Unfortunately, not all platforms take responsibility to ensure that their online environments are suited for minors to participate. Due to the lack of action from the online platforms, we acknowledge the guidelines' strong focus on ensuring effective age assurance. We highly welcome:

1. That the guidelines clearly state that self-declaration is not an appropriate age assurance method, since it does not meet the requirements of robustness and accuracy (line 352).
2. That measures chosen by platforms for age assurance should be the ones that are effective while interfering as little as possible with privacy and data.
3. That age verification must be implemented on high-risk services with 18+ restricted content and goods.
4. That providers of online platforms should implement an age assurance method as proximate as possible to the harmful content, sections or functions on their platform (e.g. a chat function or livestream function) and when to use age verification measures (line 242).
5. That the guidelines consider avoiding that children are unrightfully excluded from online platforms (line 302).

However, we find it crucial that determining whether an online platform is high risk or medium risk is not left to the self-assessment of the platforms. It must be defined with clear benchmarks, and subject to external oversight. We strongly recommend that the obligation for effective age verification also include online platforms where there is a documented high risk of minors being exposed to harmful content, despite the required minimum age of the platform being lower than 18.³ In this regard we recommend the Commission to emphasize, to the greatest extent possible, that age verification through an ID Wallet solution would be appropriate.

We also suggest that the Commission define frameworks for e.g. harmful content and functions that requires age assurance. As an example, we recommend that feeds on social media platforms, where content is distributed by data-driven algorithms in very dynamic ways, should be part of the framework since it contains great risks of minors being exposed to harmful and maybe illegal content. These frameworks should be continuously revised and

³<https://medieraadet.dk/Media/638760063703860803/Unders%C3%B8gelse%20om%20unges%20brug%20af%20digitale%20medier.pdf>

take new emerging trends into account.

Furthermore, we recommend clarifying, in the descriptive box in line 272, the possibility of restricting adults from youth environments in the same way that age verification aims to keep minors out of adult environments. It should be clarified that youth spaces are further protected by making it more difficult for adults with bad intentions to interact with minors. Lastly, we want to state that age verification measures can't stand alone in securing minors on online platforms. The measures taken must be based on a holistic review and risk assessment of the platform and services and further followed by age appropriate designs (line 358).

6.2 Registration

We recommend that the Commission stress that registration processes should be communicated in child-friendly and easily understandable language, particularly in relation to age verification and protection from harmful content. Platforms should implement pedagogical initiatives to help children view these measures as protective rather than punitive (Line 368).

We support the guideline's focus on the right to be forgotten (Line 377). As a Trusted Flagger under the DSA, Save the Children Denmark observes that minors often face challenges in managing account creation and deletion due to forgotten emails or passwords. At our helpline, we see that the need to delete old profiles is frequently linked to bullying cases. Platforms must simplify account deletion processes, especially for children. Many minors create email addresses solely for registration purposes but later forget the credentials, making it difficult to delete profiles. We call on the Commission to ensure platforms facilitate child-friendly registration and account deletion processes with accessible language and tools.

Furthermore, service providers must take clear responsibility for user safety. This responsibility should extend to ensuring that registration processes are designed to protect children and facilitate safe account management throughout their use of the platform through potential deletion. We therefore recommend that the Commission deletes the term "encouraging and enticing " in line 375, since it simply sets the bar too low.

In summary, registration and age verification must protect children effectively, ensure easy account management, and support their rights, including the right to be forgotten. Platforms should treat these responsibilities with the same rigor as other safety requirements.



6.3 Account settings

We strongly support the requirement that online platforms accessible to minors must set accounts to the highest level of privacy, safety, and security by default (line 395). This is a vital step in ensuring the protection of children online and aligns with the principle of acting in the best interest of the child. Default settings that prioritize children's safety should be mandatory, and it should be ensured that children are not nudged towards changing their settings. Robust age verification is also necessary to ensure these protections are activated appropriately (Lines 383–413).

We acknowledge the importance of extending safety measures to specific functionalities within platforms. For example, livestream features should be carefully restricted to minimize risks to minors (Line 404). Push notifications should be designed to avoid disruptions to sleep routines, helping promote healthy online habits (Line 407). Additionally, slowing down content display can play a significant role in minimizing excessive usage, which is important for children's well-being (Lines 417–421). We welcome that the guidelines state that filters that can have detrimental effects on body image should be turned off by default and platforms should clearly inform users when content is being presented with a filter applied (Line 422–423).

We suggest that the section (line 414–416) addressing features that may contribute to excessive use should be expanded with more examples: Limit an excessive focus on relationships to increase retention (e.g., Streaks, Peek-a-peek, expanded friend lists with icons, Snap Map etc. – where teenage insecurities are often exploited for retention). Other examples include beauty videos on TikTok, Reels, and YouTube Shorts or “manospheric” content targeting vulnerable youth.

For further information, we refer to our previous inputs to the Commission on systemic risks (Article 34 and 35).

6.4 Online Interface design and other tools

We highly acknowledge that the guidelines include guidance on how to increase safety by design and by default for minors on online platforms. We recommend that the guidelines specify what these measures should mean or look like instead of could mean or look like (line 482–506). We suggest that the Commission makes a non-extensive list of functions or features that would not be compliant with Article 28 in the DSA, and the guidelines in regard of online interface design and other tools.

We welcome the focus in the guidelines on minors being protected by persuasive design such as mentioned ‘by default’ and through age verification (line 484). However, we recommend the Commission to define ‘persuasive’.

We welcome the guidance on creating real friction as an important measure and ask the Commission to specify the meaning of real fiction. It makes sense to introduce reminders about time usage, but our impression from conversations with minors is that reminders are often just seen as an annoyance and are easily dismissed.

6.5 Recommender systems and search features

Safer Internet Centre Denmark supports age-appropriate recommender systems, call on the Commission to clarify how often and in what ways platforms should comply with these requirements to make them effective.

More than half of children and young people are negatively affected by exposure to violent content. See for example this quote from a 15-year-old girl from Denmark:

“There was a video on TikTok with a girl sitting in a shower and then there were three men who were cutting her head off until her head turned completely blue and came off. Or the guy who shot himself in the head live. Someone also blended a cat alive. It’s kind of uncomfortable. I was just scrolling. I thought “Why would they do that?” Then I scrolled on. I didn’t really know what to do.”⁴

Young people’s typical reactions include physical discomfort, such as stomach aches (19%), fear (16%), and difficulties sleeping (14%). This underscores the urgent need for responsible content moderation and platform adjustments tailored to children’s developmental needs⁵.

Mandatory actions for platforms

The current situation reflects the conflict between children’s rights and platform business models. We support the guideline outlined in line 535-538 but recommend that these measures are made mandatory. Providers already have the capability to predict preferences and behaviors, yet often they still do not act in the best interest of minors. It is not the responsibility of minors to protect themselves in these environments. Instead, it is the providers' responsibility to ensure compliance with children's rights and best interests, which should not be defined solely by the platforms, as past examples have proven inefficient and harmful.

⁴ <https://sletdet.redbarnet.dk/wp-content/uploads/2024/10/Children-and-young-peoples-exposure-to-digital-violations-and-other-unpleasant-experiences-online-2024.pdf>

⁵ Ibid.

**Recommendations on recommender systems**

We fully support the guidelines focus on issues related to beauty standards and dieting, particularly in connection with mental health challenges (line 552). We also support that platforms should "provide minors with the opportunity to reset their recommended feeds completely and permanently" (line 579), as this is a crucial step to prevent users from falling into harmful content loops or "rabbit holes."

Profiling-based recommender systems should be restricted and turned off by default for minors, especially since much of the content recommended is commercial in nature (line 583). By default, content variants not based on profiling should be set for minors. Transparency (line 594) is appreciated but will only have an impact if accompanied by effective age verification, moderation, and mandatory age adjustments. Without these measures, children are left to navigate overly complex systems that they cannot fully comprehend.

We support that "providers should provide information to minors about prompts..." (line 596) to ensure transparency and better support for young users. But it is doubtful that prompts alone are sufficient to encourage minors to seek new content. The responsibility must lie with the platform. From real-world experience, we know that few children use existing tools to adjust settings. Adding complexity to these systems will not necessarily improve outcomes.

Platforms should offer an option for users to periodically and automatically reset their feed/recommender system (line 604). This would provide a proactive solution to help minors avoid harmful content loops and regain control over their digital experiences.

Safer Internet Centre Denmark supports these recommendations and calls for stronger enforcement measures to ensure platforms prioritize children's rights and well-being in their design and operations.

6.6 Commercial practices

We support the overall guideline that minors, particularly, need to be protected and have a right to be protected against commercial and economically exploitive practices. It is especially positive to see a focus on influencers (650), loot boxes (663), and manipulative design techniques (666). However, we recommend the Commission to provide more precise guidelines.

Children are easy-to-influence with current blurred marketing which they are massively exposed to today, e.g. influencer content, advertorials, sponsored content etc.

Minors are exploited commercially and exposed to harmful, unethical and unlawful advertising today (line 626-638), where service providers do not implement necessary protection. We urge the Commission to specify how platforms can make sure that children are not exploited and exposed commercially.



We support that declarations of commercial communication are clearly visible, child-friendly and accessible (line 635), however despite labelling schemes, it is difficult to discern commercial intent if a product is promoted by idols/influencers.

Regarding the guideline described in line 653-657, we would like to add that the possibility for donating and making purchases on the platforms should be off by default for minors. Furthermore, we suggest that the Commission supplement the guidelines with new legislation that ensure that virtual currency is made more transparent rather than just being addressed in platform/provider recommendations. In our conversations with children, we often see that it becomes impossible to compare virtual money with actual value due to marketing mechanisms such as bulk purchases.

About the recommendations in lines 661–669, we view loot boxes as a design strategy, and the resulting unintended purchases should be made significantly more difficult for minors to complete. We recommend ensuring that minors are not exposed to practices that can lead to excessive or unwanted spending or addictive behaviours by setting a minimum age and put such practices behind age verification.

6.7 Moderation

We support the guidelines' focus on the importance of moderation to reduce minors' exposure to harmful content behaviour. We also value that the guidelines underline the importance of Trusted Flaggers.

We recommend that the Commission emphasises the importance of human review, by specific requirements for human moderation of videos or content that generate significant views, as this will help address risks associated with widely circulated material (Line 699). We suggest that "consider" in line 699 is replaced with "ensure".

We welcome the importance the guidelines have on preventing cross-platform dissemination (line 714-716). From our helplines, we know that cross-platform activity is often used as a tactic by groomers and other offenders, and that illegal or harmful content is disseminated across different platforms. Therefore, when such activity is flagged by minors or Trusted Flaggers (TF), it should hold significant weight and be thoroughly addressed.

7. Reporting, User Support, and Tools for Guardians

We find it highly important that the guidelines address *reporting, user support and tools for guardians*, since it is our experience that report functions on the most popular social media are often not child friendly to use, and the following processes of how the reports are handled are also unclear and difficult for minors to engage in. However, we want to state that the possibility of reporting or influencing what content you want to see are important actions to have. Still, it



is crucial to state that it should never become the child's main responsibility to reject or report unpleasant content recommended by the algorithm. As a baseline, the responsibility lies with the platform.

Based on research in Denmark and our helpline services and dialogue with children in Safer Internet Centre Denmark, we find that many minors have lost faith in reporting, as they often feel nothing happens afterward. We also find that many children refrain from reporting out of fear that others will see that they have reported content. It is very important that minors feel safe in the process. Besides ensuring child friendly and efficient report functions for minor users, it is also important that non-users can report content on the platform. Experiences from Save the Children Denmark's helpline SletDet show that children are being bullied and harassed by other peers, who create false profiles of them, and sometimes on platforms where the child itself is not a user. It is therefore important that non-users can report fake profiles - and other forms of digital harassment and abuse – and that the platform handles these reports efficiently (line 771).

We welcome the guidelines' point about the platforms having to review their risk assessments of their features and services, based on the reports, feedback and complaints they receive, and adjust accordingly to ensure the privacy, safety and security of minors. We suggest that the guidelines also address how online platforms should document their compliance to this practice (lines 790-794).

Specifically for AI chatbots integrated in social media platforms, we recommend that this feature is turned off by default for minors. There are many examples of AI chatbots causing harm to children and they are therefore not compliant with children's right to be protected from harm. In general, generative AI is expected to play a significant role in the future of social media platforms, which is why guidelines in this area should be dynamic and editable on relatively short notice (line 816-824).

Regarding *user support measures*, we believe that the guidelines should also mention trusted flaggers along with the Safer Internet Centres and INHOPE, since it is important that the public become aware of all the support measures available to them (lines 804-807).

Parental or caregiver control systems are beneficial when they promote cooperation between the platform and the parents/caregivers in ensuring the child's safety. However, platforms should not rely on parental control systems as their primary means of protection, as we see these tools have low adoption rates and large social variability in their use.

Regarding the Good practice-example (lines 838-839), we find a "Help" button to be a good safety feature. It is important though, that EU helplines don't come to function as an extended part of the platforms' support center. It is important that the platforms themselves take



responsibility for offering help to minors, for example in cases where a child has lost access to an account or wants help to delete an account.

Overall, we find that the guidelines lack a focus on the providers obligation to ensure child-friendly feedback on reports issued by minors.

8. Governance

We fully support the establishment of a dedicated person or similar role to oversee this area, as outlined in Lines 879–884. We recommend that this person should also be available to Trusted Flaggers (TF) across EU and act as a designated contact person. Such a role would enhance communication and coordination, ensuring that TFs receive the necessary support to effectively address issues related to online safety and content moderation.

Additionally, we strongly endorse the measures proposed in Lines 908–911.

9. Review

It is important to regularly revisit and review these guidelines to ensure they remain relevant and effective.

Appendix 1

The Safer Internet Centre Denmark (SIC DK) is a national consortium consisting of the three organizations Save the Children Denmark, Centre for Digital Youth Care and The Media Council for Children and Young People. The three organisations have collaborated as partners in SIC DK since 2009, and each of the organisations has worked with media literacy and the protection and wellbeing of children online for more than 20 years. The three partners serve different roles in the partnership:

Save the Children Denmark runs a hotline, where citizens can report online child sexual abuse material. They collaborate with the worldwide network of INHOPE to prevent and combat child sexual abuse online. Additionally, Save the Children Denmark is appointed trusted flagger by the Digital Services Coordinator in Denmark, and reports illegal and harmful content on behalf of children on a daily basis from their helpline service 'SletDet Rådgivningen'.

Centre for Digital Youth Care runs a helpline that offers online counselling to children and young people in Denmark. In the helpline, they support children and young people in relation to their digital life. Additionally, they provide counselling and community through their online platforms Cyberhus.dk, Scammed.dk, Gruppechat.dk and Cfdp.dk. The platforms target both children, young people and parents, and they communicate through various channels, e.g. chat, debate forums and an online letter box.

The Media Council for Children and Young People have the role as the awareness centre with the main task of informing and educating the public about a safe and nuanced use of digital technologies. As a knowledge hub and mediator of the newest developments within the area of children and young people's use of online technologies, SIC DK has established a broad collaboration with representatives from academic institutions, industry, governmental bodies and law enforcement. Moreover, the awareness centre provides educational materials regarding children and young people's digital life and media literacy.

SIC DK contributes to the national implementation of the shared European Strategy 'Better Internet for Kids+', and the DSA. SIC DK partakes in strategy to ensure that children are protected, respected and empowered online and when using digital technologies. Additionally, the Centre aims to combat illegal and harmful content online. SIC DK has been co-funded by the European Union under the Digital Europe Program.

For more information, visit our website: [SICKDK](https://sick.dk)