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Targeted public consultation on the protection of minors guidelines under the Digital Services Act

Fields marked with * are mandatory.

Introduction

The objective of this survey is to offer stakeholders the opportunity to share their insights and contribute to the development of the protection of minors guidelines pursuant to Article 28 of the Digital Services Act (DSA).

These guidelines aim to support online platforms accessible to minors in ensuring a high level of privacy, safety and security for minors as required by the DSA.

The guidelines will apply to providers of online platforms that are accessible to minors, including very large ones with over 45 million monthly users in the EU. However, micro and small enterprises will be exempt, pursuant to the DSA.

The guidelines adopt the same risk-based approach that underpins the DSA, recognising that different platforms pose varying levels of risks to minors. This ensures that platforms can tailor their measures to their specific services, avoiding undue restrictions on children's rights.

The draft guidelines outline a non-exhaustive list of measures that providers of online platforms can implement to protect minors in the following areas:

Risk review

- Risk review

Service Design

- Age assurance
- Registration
- Account settings
- Online interface design and other tools
- Recommender systems and search features
- Commercial practices

- Moderation

Reporting, user support and tools for guardians

- User reporting, feedback and complaints
- User support measures
- Tools for guardians

Governance

- Governance (general)
- Terms and conditions
- Monitoring and evaluation
- Transparency

This survey is structured in three parts. Part 1 focuses on collecting information about you as a respondent to the survey. Part 2 collects your overall views on the draft guidelines. Part 3 gives you the opportunity to provide detailed feedback on one or several of the sections listed above.

Opening: 13 May 2025
Closing: **15 June 2025**, midnight

The questions in this survey relate to the draft guidelines on measures to ensure a high level of privacy, safety and security for minors online pursuant to Article 28 of the Digital Services Act that you can download here.

Article_28_DSA_Guidelines_-_Final_Version_For_Public_Consulation_-_13.05.2025.pdf

Part 1: About you

* Language of my contribution

We will use a machine translation of your contribution if you submit it in another language than English".

- Bulgarian
- Croatian
- Czech
- Danish
- Dutch
- (●) English
- Estonian
- Finnish
- French
- German
- Greek
- Hungarian
- Irish
- Italian
- Latvian

- Lithuanian
- Maltese
- Other
- Polish
- Portuguese
- Romanian
- Slovak
- Slovenian
- Spanish
- Swedish

* I am giving my contribution as
  - Academic/research institution
  - Company/business
  - Business association
  - Consumer organisation
  - EU citizen
  - Non-EU citizen
  - Non-governmental organisation (NGO)
  - Public authority
  - Trade union
  - Other

* First name

Jutta

* Surname

Croll

* Email (this will not be published)

jcroll@digitale-chancen.de

Name of organisation

255 character(s) maximum

255 character(s) maximum

Digital Opportunities Foundation / Stiftung Digitale Chancen, Germany

* Nationality / country of origin of the organisation
  - AT - Austria
  - BE - Belgium
  - BG - Bulgaria
  - HR - Croatia
  - CY - Cyprus

- CZ - Czechia
- DK - Denmark
- EE - Estonia
- FI - Finland
- FR - France
- (•) DE - Germany
- EL - Greece
- HU - Hungary
- IE - Ireland
- IT - Italy
- LV - Latvia
- LT - Lithuania
- LU - Luxembourg
- MT - Malta
- NL - Netherlands
- Other - Other
- PL - Poland
- PT - Portugal
- RO - Romania
- SK - Slovak Republic
- SI - Slovenia
- ES - Spain
- SE - Sweden

* Is your organisation one of the entities designated as very large online platform (VLOP) or search engine (VLOSE) pursuant to article 33 of Regulation 2022/2065, or representing the interests of one of those entities?
  - Yes
  - (•) No

* Are you an online platform or other intermediary (non-VLOP/VLOSE) with less than 45 million active users in the EU, or representing the interests of one of those entities?
  - Yes
  - (•) No

Transparency register number

Add the number if your organisation is on the transparency register. It's a voluntary database for organisations seeking to influence EU decision-making.

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* **Privacy settings for your contribution**

The Commission may publish the responses to this public consultation. You can choose whether you would like your details to be made public or to remain anonymous.

- **Anonymous**
  If you choose this option, we would publish the type of respondent that you represent, your country of origin or nationality if you have replied as a citizen, and the contribution you have submitted. Your name and email would not be published. Please make sure you do not include any personal data in the contribution itself.
- **Public**
  If you chose this option we would publish your name, the type of respondent that you represent, your country of origin/nationality and the contribution you have submitted.

* This survey is carried out by the Digital Services Unit at the European Commission's Directorate-General for Communications Networks, Content and Technology. The Digital Services Unit is the operational controller and can be contacted at CNECT-F2@ec.europa.eu.

- I agree with the personal data protection provisions.

Part 2: General comments

In part 2 we seek your general feedback on the attached draft protection of minors guidelines. Please reserve your detailed feedback on specific sections of the guidelines to part 3 of this survey.

CLARITY

Overall, how clear is the structure of the proposed guidelines?

- Very unclear
- Somewhat unclear
- Neutral
- Somewhat clear
- Very clear
- I do not know

Comments

2000 character(s) maximum

APPROPRIATENESS

Overall, how appropriate are the proposed measures to ensure a high level of privacy, safety and security for minors on platforms accessible to minors (as defined in the guidelines)?

- Not appropriate
- Somewhat appropriate
- Neutral
- Appropriate
- Very appropriate
- I do not know

Comments

2000 character(s) maximum

Although we judge the Guidelines as very appropriate in eight sections, we see room for improvement in others. Our overall judgement is based on the only "somewhat appropriateness" of sec. 6.1 Age Assurance which should be improved in regard of age estimation not being considered an appropriate means to reach a high level of privacy, safety and security of minors. Since age assurance is the basis for the effectiveness of many recommendations in the guidelines the poor judgement in this section outweighs the better judgement in others.

NOVELTY

Overall, to what extent do you think online platforms accessible to minors already comply with the recommended measures set out in these guidelines?

- ○ Not at all
- ◉ Slightly
- ○ Moderately
- ○ Largely
- ○ Fully
- ○ I do not know

Comments

2000 character(s) maximum

Although some platforms have improved in the last 3 - 5 years most of them have not even considered to carry out a risk review or a child rights impact assessment for their services. We recommend to raise awareness for the Guidelines also among platforms like f.e. gaming platforms that do not fall under the regulations of the DSA, since we consider the recommendations also useful for them.

COMPLETENESS

Are there any important aspects that are missing from the proposed guidelines?

For a start, we would like to emphasize that we have assessed the guidelines from a child rights advocate's perspective.
The best interest of the child should be explicitly added as a general principle in section 4
To realize the best interest of the child in the digital environment the concept of personal integrity (see attached article) seems appropriate. Personal integrity of children includes the protection of physical and psychological integrity as well as personal data. In particular, the age-appropriate and future-open development as well as the informational and sexual self-determination of minors must be ensured. The abuse of inexperience and age, economic exploitation and the commercial or other improper processing and dissemination of user data are, conversely, contrary to the protection of personal integrity.
The principle of evolving capacities as laid down in Art. 5 of the UN-CRC should be a guiding principle throughout the recommendations in the guidelines in order to achieve the highest level of privacy, safety and security for minors.
We suggest adding a commitment by the EC to a regular review of the guidelines in a two year interval.

CHALLENGES

What challenges do you foresee in the implementation of the proposed guidelines?

Due to a lack of transparency on the part of the platforms it will be difficult to assess the degree of implementation of the guidelines, f. e. in regard of the prioritising of complaints and reports submitted by minors (line 786-789) and in regard of many other well meant recommendations.

SUGGESTIONS

What are your suggestions to improve the text?

We suggest to refer within the Guidelines directly to DSCs playing a vital role in the implementation of the Guidelines, also for ensuring they are adhered to equally across the EC member states and beyond.
We suggest to strengthen the approach to describe (un)wanted effects and results of measures instead of listing and describing measures itself.
Recommendations in regard of Age Assurance are provided as a subtheme in section 6 Service Design. But, when going through the guidelines it turns out that the implementation of Age Assurance measures is a pre-condition for many recommendations to become effective. Thus, if a service provider comes to the conclusion not to set-up Age Assurance in their platform they might fail several further recommendations because of not knowing what age bracket their users belong to.
Additionally we strongly plead to refrain from recommending age estimation for platforms with at least medium risks for minors. Most so far known age estimation methods are highly intrusive and not data minimizing, be it biometrical data or otherwise the analysis of behavioural or environmental data, comparing the way a user interacts with a device with other users of the same age. From a child rights perspective it could not be justified to expose minors to such estimation methods, since children's right to privacy has the same priority as their right to protection. Deployment of data for age estimation does not contribute to a "high level of privacy for minors" but in the contrary will lead to infringement of their right to privacy.

Part 3: Comments per section

In the part 3 of the survey we seek your detailed feedback on specific sections of the guidelines. Please select 'Yes' for the sections on which you would like to provide feedback.

Risk review

RISK REVIEW

- (●) Yes
- ( ) No

1. APPROPRIATENESS

How appropriate are the proposed measures in this section to ensure a high level of privacy, safety and security for minors on platforms accessible to minors (as defined in the guidelines)?

- ( ) Not appropriate
- ( ) Somewhat appropriate
- ( ) Neutral
- (●) Appropriate
- ( ) Very appropriate
- ( ) I do not know

Comments

2000 character(s) maximum

2. ADVERSE EFFECTS

2.a. Do you believe that any of the measures in this section could have adverse effects on the privacy, security and safety of minors?

- ○ Yes
- ◉ No

Comments

2000 character(s) maximum

2.b. Do you believe that any of the measures in this section have an undue impact on other children's rights?

- ○ Yes
- ◉ No

Comments

2000 character(s) maximum

3. COMPLETENESS

Are there any important aspects that are missing from the proposed recommendations in this section?

1000 character(s) maximum

The EC should foresee an option for users and third parties like non-governmental organizations to give input and feedback to the risk review outcomes of the digital services providers (shadow reporting). These reports should be taken into consideration while monitoring and evaluating the compliance of digital services providers.

4. SUGGESTIONS

What are your suggestions to improve the text in this section?

2000 character(s) maximum

Line 174: Change the heading to “Child Rights Impact Assessment” instead of “Risk Review”
Line 198: Providers should carry out the review BEFORE they make … / “before” instead of “whenever”
Line 199: Amendment to […] publishing its outcomes, also in a child-friendly version.

5. ADDITIONAL COMMENTS

2000 character(s) maximum

Transfer Annex 1 into section 5 and amend the categorization by a priorisation of the Cs: 1. Contact, 2. Conduct, 3. Content, 4, Consumer, and foresee a regular review of the categorization of risks.

Age assurance

AGE ASSURANCE

- (●) Yes
- ( ) No

1. APPROPRIATENESS

How appropriate are the proposed measures in this section to ensure a high level of privacy, safety and security for minors on platforms accessible to minors (as defined in the guidelines)?

- ( ) Not appropriate
- (●) Somewhat appropriate
- ( ) Neutral
- ( ) Appropriate
- ( ) Very appropriate
- ( ) I do not know

Comments

1000 character(s) maximum

The recommendations in this section need improvement since age estimation should not be considered an appropriate means to reach a high level of privacy, safety and security of minors.

2. ADVERSE EFFECTS

2a. Do you believe that any of the measures in this section could have adverse effects on the privacy, security and safety of minors?

- (●) Yes
- ( ) No

Please explain which measures and why.

1000 character(s) maximum

Age estimation does affect minors privacy and should therefore not be considered an appropriate tool.

2.b. Do you believe that any of the measures in this section have an undue impact on other children' s rights?

- (●) Yes
- ( ) No

Please explain which measures and why

1000 character(s) maximum

Measures of age estimation bear a high risk to infringe minors' right to privacy

3. COMPLETENESS

Are there any important aspects that are missing from the proposed recommendations in this section?

1000 character(s) maximum

The EC should take a positive approach and highlight the option that age assurance methods could be used not just to restrict access of minors or adapt a service age appropriate to them but also to protect minors by restricting access for adults to services explicitly addressing children.

4. SUGGESTIONS

What are your suggestions to improve the text in this section?

2000 character(s) maximum

Line 211, replace “restricting access” by “adapting access and features/functionalities”
Line 291, replace “may also opt” by “should also opt”

5. ADDITIONAL COMMENTS

2000 character(s) maximum

Line 277 – 293: We strongly plead to refrain from recommending age estimation for platforms with at least medium risks for minors. Most so far known age estimation methods are highly intrusive and not data minimizing, be it biometrical data or otherwise the analysis of behavioural or environmental data, comparing the way a user interacts with a device with other users of the same age. From a child rights perspective it could not be justified to expose minors to such estimation methods, since children’s right to privacy has the same priority as their right to protection. Deployment of data for age estimation does not contribute to a “high level of privacy for minors” but in the contrary will lead to infringement of their right to privacy. We suggest to develop the EU age verification solution further to prove a user belongs to a certain age bracket, not only 18 + but f. e. 13 – 15 etc. and recommend to support and invest in development and deployment of privacy preserving measures and tools of age verification.
Line 300-308: For reasons of inclusion and to strengthen the right of minors to participate, digital services should also offer the option of not age-verifying/-estimating a user and, in this case, only allowing them access in the safest possible mode. This option should not apply to risks that are not permitted under (national) law.
Line 310-362: Implemented systems for age-verification or –estimation should be independently certified to reach the objectives of these guidelines.
Line 329: A method that is easy to circumvent will not be considered robust enough. In this sentence the term “easy to circumvent” needs to be more precise. F. e. a tool that can be tricked by make-up or a wig would not be robust, a tool that demands facial recognition only in the registration process would not be considered robust, since an adult might then force a child into the registration process using the such created account/profile later on to groom children.

Registration

REGISTRATION

- (●) Yes
- ( ) No

1. APPROPRIATENESS

How appropriate are the proposed measures in this section to ensure a high level of privacy, safety and security for minors on platforms accessible to minors (as defined in the guidelines)?

- ○ Not appropriate
- ○ Somewhat appropriate
- ○ Neutral
- ◉ Appropriate
- ○ Very appropriate
- ○ I do not know

Please explain which measures and why.

1000 character(s) maximum

2. ADVERSE EFFECTS

2a. Do you believe that any of the measures in this section could have adverse effects on the privacy, security and safety of minors?

- ○ Yes
- ◉ No

Please explain which measures and why.

1000 character(s) maximum

2.b. Do you believe that any of the measures in this section have an undue impact on other children' s rights?

- ○ Yes
- ◉ No

Please explain which measures and why.

1000 character(s) maximum

3. COMPLETENESS

Are there any important aspects that are missing from the proposed recommendations in this section?

1000 character(s) maximum

4. SUGGESTIONS

What are your suggestions to improve the text in this section?

2000 character(s) maximum

Line 375 – 376 the wording remains unclear in regard of a) “users who are below the minimum age required” in line 375 and “minors” in line 376

5. ADDITIONAL COMMENTS

2000 character(s) maximum

Account settings

ACCOUNT SETTINGS

- (●) Yes
- ( ) No

1. APPROPRIATENESS

How appropriate are the proposed measures in this section to ensure a high level of privacy, safety and security for minors on platforms accessible to minors (as defined in the guidelines)?

- ( ) Not appropriate
- ( ) Somewhat appropriate
- ( ) Neutral
- ( ) Appropriate
- (●) Very appropriate
- ( ) I do not know

Please explain which measures and why.

1000 character(s) maximum

2. ADVERSE EFFECTS

2a. Do you believe that any of the measures in this section could have adverse effects on the privacy, security and safety of minors?

- (●) Yes
- ( ) No

Please explain which measures and why.

1000 character(s) maximum

Line 449 – 472 In regard of removal of settings, features and functionalities altogether, see also below

2.b. Do you believe that any of the measures in this section have an undue impact on other children’s rights?

- (●) Yes
- ( ) No

Please explain which measures and why.

1000 character(s) maximum

Line 449 – 472 In regard of removal of settings, features and functionalities altogether, see also below

3. COMPLETENESS

Are there any important aspects that are missing from the proposed recommendations in this section?

1000 character(s) maximum

4. SUGGESTIONS

What are your suggestions to improve the text in this section?

2000 character(s) maximum

Line 402-403: Amendment: […] can see their content and posts – if the minor not decided to hide all or some of them.
Line 402: delete “previously”
Line 424: Amendment: […] update default settings together with minors, ensuring that they […]
Line 430: Formulate more concretely what is meant with “not in any way encouraged or enticed …; provide examples
Line 439: Add a recommendation to remind minors after having temporarily changed settings to set them back to safe
Line 436 refers to minors changing their default settings. The recommendations in line 439- 447 should be amended by precise details when and where agreement by the minors shall be sought, when and where warning signals shall be given, etc.
Line 458 – 460: Clarify whether minors may receive suggestions of other minors’ accounts or may not receive suggestions at all.
Line 461-464: Extension: […] that the minor follows – besides the minor decides to hide all or some of these information - , and that such information […]

5. ADDITIONAL COMMENTS

2000 character(s) maximum

Line 395: We welcome the wording in regard of accounts of minors to set these to the HIGHEST level of privacy, safety and security by default although this seems to exceed the requirements of DSA 28 (1) to ensure a HIGH level of privacy, safety and security. From a child rights perspective by default settings should reach the highest level.
Like in other sections we underline that all recommendations in this section will take effect only if the platform provider has knowledge in regard of the age bracket their users fall into, i.e. AV must be obligatory.
Line 449-452 + 468-472: There is a lack of clarity regarding whether removal of settings, features and functionalities altogether from platforms accessible to minors shall be considered (line 449-452), while line 468-472 refer explicitely to removal from MINOR's accounts.

Online interface design and other tools

ONLINE INTERFACE DESIGN AND OTHER TOOLS

- (●) Yes
- ( ) No

1. APPROPRIATENESS

How appropriate are the proposed measures in this section to ensure a high level of privacy, safety and security for minors on platforms accessible to minors (as defined in the guidelines)?

- ( ) Not appropriate
- ( ) Somewhat appropriate
- ( ) Neutral
- ( ) Appropriate
- (●) Very appropriate
- ( ) I do not know

Please explain which measures and why.

1000 character(s) maximum

2. ADVERSE EFFECTS

2a. Do you believe that any of the measures in this section could have adverse effects on the privacy, security and safety of minors?

- ( ) Yes
- (●) No

Please explain which measures and why.

1000 character(s) maximum

2.b. Do you believe that any of the measures in this section have an undue impact on other children' s rights?

- ( ) Yes
- (●) No

Please explain which measures and why.

1000 character(s) maximum

3. COMPLETENESS

Are there any important aspects that are missing from the proposed recommendations in this section?

1000 character(s) maximum

4. SUGGESTIONS

What are your suggestions to improve the text in this section?

2000 character(s) maximum

Line 474-476We suggest to amend as follows […] is an effective means of ensuring a minors personal integrity and a high level of privacy …

5. ADDITIONAL COMMENTS

2000 character(s) maximum

Line 474-476 + 482-483: We welcome the phrasing “allowing minors to take control of their online experiences is an effective means … / allowing minors how to engage with their services …”, these recommendations are in line with GC #25, para 19 – 20 and reflect the need to empower children to cope with the digital environment.

Recommender systems and search features

RECOMMENDER SYSTEMS AND SEARCH FEATURES

- (●) Yes
- ( ) No

1. APPROPRIATENESS

How appropriate are the proposed measures in this section to ensure a high level of privacy, safety and security for minors on platforms accessible to minors (as defined in the guidelines)?

- ( ) Not appropriate
- ( ) Somewhat appropriate
- ( ) Neutral
- (●) Appropriate
- ( ) Very appropriate
- ( ) I do not know

Please explain which measures and why.

1000 character(s) maximum

2. ADVERSE EFFECTS

2a. Do you believe that any of the measures in this section could have adverse effects on the privacy, security and safety of minors?

- ( ) Yes
- (●) No

Please explain which measures and why.

1000 character(s) maximum

2.b. Do you believe that any of the measures in this section have an undue impact on other children' s rights?

- ○ Yes
- ◉ No

Please explain which measures and why.

1000 character(s) maximum

3. COMPLETENESS

Are there any important aspects that are missing from the proposed recommendations in this section?

1000 character(s) maximum

Line 551-556: Amendment […] in dangerous activities. Engage expertise from child rights and child protection organizations when defining the types of content this section refers to.
Line 579-580 Amendment: […] completely and permanently. Also offer the option to cancel the reset of the recommend feed after a certain amount of time to avoid fear of reset.
Line 583-584: Amendment: […] can choose options of their recommender system that is curated by the service but not based on profiling or that is totally random – but not putting children into risk.

4. SUGGESTIONS

What are your suggestions to improve the text in this section?

2000 character(s) maximum

Line 509-522: Highlight positive effects of recommendations systems e.g. offering advice or contact to hot- and helplines while searching for critical issues, deploy recommender systems to ensure diversity of recommended content and contacts, and encourage services to further develop recommender systems serving the best interest of the child.
Line 539-550: Not only prioritise implicit engagement based signals but also encourage services to refrain from assessment of implicit engagement-based signals if the user has provided certain amount of explicit signals.
Line 551 – 556 base the decision on content that may pose a risk to minors on external expertise, f.e. child rights and child protection experts.
ADDITIONAL COMMENTS:
Line 594 – 599: Ensure info is available but not in a pushy way to avoid minors becoming annoyd
Line 568 – 573: The term “well-known” is too imprecise, the selection of blocked search terms must be neutral, not based on certain traditional values that means f.e. not exclude terms regards LGBTQI, in order not to impair achievement of the full personal development of a child to their fullest potential (UN_CRC; Abs. 29 (1) / 23 (3))
Line 604 – 610: functionality is relevant for all users!

Commercial practices

COMMERCIAL PRACTICES

- ◉ Yes
- ○ No

1. APPROPRIATENESS

How appropriate are the proposed measures in this section to ensure a high level of privacy, safety and security for minors on platforms accessible to minors (as defined in the guidelines)?

- ○ Not appropriate
- ○ Somewhat appropriate
- ○ Neutral
- ◉ Appropriate
- ○ Very appropriate
- ○ I do not know

Please explain which measures and why.

1000 character(s) maximum

2. ADVERSE EFFECTS

2a. Do you believe that any of the measures in this section could have adverse effects on the privacy, security and safety of minors?

- ○ Yes
- ◉ No

Please explain which measures and why.

1000 character(s) maximum

2.b. Do you believe that any of the measures in this section have an undue impact on other children' s rights?

- ○ Yes
- ◉ No

Please explain which measures and why.

1000 character(s) maximum

3. COMPLETENESS

Are there any important aspects that are missing from the proposed recommendations in this section?

1000 character(s) maximum

para. 6.6: Add a guideline to limit also the quantity of commercial advertisement at all – not just by certain risks, e,g, could be foreseen that within a certain time spent of usage of a service just a certain number of commercial advertisement are allowed.

4. SUGGESTIONS

What are your suggestions to improve the text in this section?

2000 character(s) maximum

Make clear that the recommendations in this section are directed also at gaming platforms although these do not fall under the DSA, f. e. in line 663 where loot boxes and gambling are mentioned.

5. ADDITIONAL COMMENTS

2000 character(s) maximum

Preface the definition of the terms with regard to the distinction between „hidden advertising“, „product placements by influencers“

Moderation

MODERATION

- (●) Yes
- ( ) No

1. APPROPRIATENESS

How appropriate are the proposed measures in this section to ensure a high level of privacy, safety and security for minors on platforms accessible to minors (as defined in the guidelines)?

- ( ) Not appropriate
- (●) Somewhat appropriate
- ( ) Neutral
- ( ) Appropriate
- ( ) Very appropriate
- ( ) I do not know

Please explain which measures and why.

1000 character(s) maximum

2. ADVERSE EFFECTS

2a. Do you believe that any of the measures in this section could have adverse effects on the privacy, security and safety of minors?

- ( ) Yes
- (●) No

Please explain which measures and why.

1000 character(s) maximum

2.b. Do you believe that any of the measures in this section have an undue impact on other children' s rights?

- ○ Yes
- ◉ No

Please explain which measures and why.

1000 character(s) maximum

3. COMPLETENESS

Are there any important aspects that are missing from the proposed recommendations in this section?

1000 character(s) maximum

4. SUGGESTIONS

What are your suggestions to improve the text in this section?

2000 character(s) maximum

Line 686 – 687: Amend the following sentence: “This should include but not be limited to any content and behaviour that is illegal under under EU or national law.
Line 695 – 698: Delete the reference to the number of minors, since the number of minors who may be harmed should not be a criterion for prioritizing moderation because even one potentially harmed minor is too much.
Line 699: Make human review obligatory be replacing the word “consider” human review by “apply” human review.

5. ADDITIONAL COMMENTS

2000 character(s) maximum

User reporting, feedback and complaints

USER REPORTING, FEEDBACK AND COMPLAINTS

- ◉ Yes
- ○ No

1. APPROPRIATENESS

How appropriate are the proposed measures in this section to ensure a high level of privacy, safety and security for minors on platforms accessible to minors (as defined in the guidelines)?

- ○ Not appropriate
- ○ Somewhat appropriate
- ○ Neutral
- ◉ Appropriate

- ○ Very appropriate
- ○ I do not know

Please explain which measures and why.

1000 character(s) maximum

2. ADVERSE EFFECTS

2a. Do you believe that any of the measures in this section could have adverse effects on the privacy, security and safety of minors?

- ◉ Yes
- ○ No

Please explain which measures and why.

1000 character(s) maximum

Line 743 -744: User reports on suspected underage accounts may have a negative impact on children's rights and may negatively affect their privacy, safety and security in case of false positives.

2.b. Do you believe that any of the measures in this section have an undue impact on other children's rights?

- ◉ Yes
- ○ No

Please explain which measures and why.

1000 character(s) maximum

Line 743 -744: User reports on suspected underage accounts may have a negative impact on children's rights and may negatively affect their privacy, safety and security in case of false positives.

3. COMPLETENESS

Are there any important aspects that are missing from the proposed recommendations in this section?

1000 character(s) maximum

Line 777-785: The EC should encourage digital services to be transparent on their reporting mechanism and handling procedures and inform users in a child-friendly and accessible manner about them – not just in case and after submitting a report.

4. SUGGESTIONS

What are your suggestions to improve the text in this section?

2000 character(s) maximum

Line 739-742: Amendment: […] accessible to minors and offer the option to upload proof or evidence such as screenshots.

Line 745-753: Refer to “explicit user feedback” as mentioned in section 6.5.1, line 539-552
Line 782-785: Amendment: […] for deciding the report or complaint, possible outcomes and on the results after closing the process.

5. ADDITIONAL COMMENTS

2000 character(s) maximum

We welcome the recommendations in this section but would like to point out that their effectiveness is dependent on knowledge of the user belonging to a certain age group, which means implementation of strong and reliable age verification. Otherwise f.e. neither prioritizing reports and complaints submitted by minors nor provision of minors that submit a report with a confirmation would work.

User support measures

USER SUPPORT MEASURES

- (●) Yes
- ( ) No

1. APPROPRIATENESS

How appropriate are the proposed measures in this section to ensure a high level of privacy, safety and security for minors on platforms accessible to minors (as defined in the guidelines)?

- ( ) Not appropriate
- ( ) Somewhat appropriate
- ( ) Neutral
- (●) Appropriate
- ( ) Very appropriate
- ( ) I do not know

Please explain which measures and why.

1000 character(s) maximum

2. ADVERSE EFFECTS

2a. Do you believe that any of the measures in this section could have adverse effects on the privacy, security and safety of minors?

- ( ) Yes
- (●) No

Please explain which measures and why.

1000 character(s) maximum

2.b. Do you believe that any of the measures in this section have an undue impact on other children’s rights?

- ○ Yes
- ◉ No

Please explain which measures and why.

1000 character(s) maximum

3. COMPLETENESS

Are there any important aspects that are missing from the proposed recommendations in this section?

1000 character(s) maximum

4. SUGGESTIONS

What are your suggestions to improve the text in this section?

2000 character(s) maximum

Line 816-824: Amendment: […] “to avoid by default minors under the age of 12 years interacting with an AI system and to warn older minors aged 12 – 17 that they are interacting with an AI system”.

5. ADDITIONAL COMMENTS

2000 character(s) maximum

As in section 7.1 we would like to point out that the effectiveness of the recommendations in Sec. 7.2 is dependent on knowledge of the user belonging to a certain age group, which means implementation of strong and reliable age verification. Otherwise f.e. the recommendation on group functions in line 836-838 would not work properly.

Tools for guardians

TOOLS FOR GUARDIANS

- ◉ Yes
- ○ No

1. APPROPRIATENESS

How appropriate are the proposed measures in this section to ensure a high level of privacy, safety and security for minors on platforms accessible to minors (as defined in the guidelines)?

- ○ Not appropriate
- ○ Somewhat appropriate
- ○ Neutral
- ○ Appropriate
- ◉ Very appropriate
- ○ I do not know

Please explain which measures and why.

1000 character(s) maximum

2. ADVERSE EFFECTS

2a. Do you believe that any of the measures in this section could have adverse effects on the privacy, security and safety of minors?

- ○ Yes
- ◉ No

Please explain which measures and why.

1000 character(s) maximum

2.b. Do you believe that any of the measures in this section have an undue impact on other children' s rights?

- ○ Yes
- ◉ No

Please explain which measures and why.

1000 character(s) maximum

3. COMPLETENESS

Are there any important aspects that are missing from the proposed recommendations in this section?

1000 character(s) maximum

We suggest to add before line 856 as follows: Encourage guardians to inform and discuss with their children / with minors whether and why they would like to activate the guardian control tools.

4. SUGGESTIONS

What are your suggestions to improve the text in this section?

2000 character(s) maximum

5. ADDITIONAL COMMENTS

2000 character(s) maximum

We welcome the wording “Tools for Guardians” since its often not only the parents who guide minors through the digital environment. We also welcome that these tools shall be treated as complementary to safety by design and other measures.

Governance (general)

GOVERNANCE (GENERAL)

- (●) Yes
- ( ) No

1. APPROPRIATENESS

How appropriate are the proposed measures in this section to ensure a high level of privacy, safety and security for minors on platforms accessible to minors (as defined in the guidelines)?

- ( ) Not appropriate
- ( ) Somewhat appropriate
- ( ) Neutral
- ( ) Appropriate
- (●) Very appropriate
- ( ) I do not know

Please explain which measures and why.

1000 character(s) maximum

2. ADVERSE EFFECTS

2a. Do you believe that any of the measures in this section could have adverse effects on the privacy, security and safety of minors?

- ( ) Yes
- (●) No

Please explain which measures and why.

2.b. Do you believe that any of the measures in this section have an undue impact on other children' s rights?

- ( ) Yes
- (●) No

Please explain which measures and why.

1000 character(s) maximum

3. COMPLETENESS

Are there any important aspects that are missing from the proposed recommendations in this section?

1000 character(s) maximum

4. SUGGESTIONS

What are your suggestions to improve the text in this section?

2000 character(s) maximum

Line 879: We suggest to amend the term “Child Rights Impact Officer / Child Rights Impact Team” in this recommendation to underline that the designated person or team is in charge of children’s rights to protection, provision and participation.

5. ADDITIONAL COMMENTS

2000 character(s) maximum

Line 887-891: We welcome the recommendation of fostering a culture of child participation and the reference to children’s best interest.

Terms and conditions

TERMS AND CONDITIONS

- (●) Yes
- ( ) No

1. APPROPRIATENESS

How appropriate are the proposed measures in this section to ensure a high level of privacy, safety and security for minors on platforms accessible to minors (as defined in the guidelines)?

- ( ) Not appropriate
- ( ) Somewhat appropriate
- ( ) Neutral
- ( ) Appropriate
- (●) Very appropriate
- ( ) I do not know

Please explain which measures and why.

1000 character(s) maximum

2. ADVERSE EFFECTS

2a. Do you believe that any of the measures in this section could have adverse effects on the privacy, security and safety of minors?

- (●) Yes
- ( ) No

Please explain which measures and why.

Listing the types of content and behaviour that are considered to be harmful for minor’s privacy, safety and security might itself pose a risk to minors.

2.b. Do you believe that any of the measures in this section have an undue impact on other children' s rights?

- ○ Yes
- ◉ No

Please explain which measures and why.

1000 character(s) maximum

3. COMPLETENESS

Are there any important aspects that are missing from the proposed recommendations in this section?

1000 character(s) maximum

4. SUGGESTIONS

What are your suggestions to improve the text in this section?

2000 character(s) maximum

5. ADDITIONAL COMMENTS

2000 character(s) maximum

Line 924-936: We welcome the transparency approach behind these recommendations. But, listing the types of content and behaviour that are considered to be harmful for minor's privacy, safety and security might itself pose a risk to minors. Providers should be cautioned to consider how this information is provided.

Monitoring and evaluation

MONITORING AND EVALUATION

- ◉ Yes
- ○ No

1. APPROPRIATENESS

How appropriate are the proposed measures in this section to ensure a high level of privacy, safety and security for minors on platforms accessible to minors (as defined in the guidelines)?

- ○ Not appropriate
- ○ Somewhat appropriate
- ○ Neutral
- ○ Appropriate
- ◉ Very appropriate
- ○ I do not know

Comments

1000 character(s) maximum

2. ADVERSE EFFECTS

2a. Do you believe that any of the measures in this section could have adverse effects on the privacy, security and safety of minors?

- ○ Yes
- ◉ No

Please explain which measures and why.

1000 character(s) maximum

2.b. Do you believe that any of the measures in this section have an undue impact on other children' s rights?

- ○ Yes
- ◉ No

Please explain which measures and why.

1000 character(s) maximum

3. COMPLETENESS

Are there any important aspects that are missing from the proposed recommendations in this section?

1000 character(s) maximum

4. SUGGESTIONS

What are your suggestions to improve the text in this section?

2000 character(s) maximum

5. ADDITIONAL COMMENTS

2000 character(s) maximum

Line 953-959: We welcome the participatory approach to consult with minors on a regular base.

Transparency

TRANSPARENCY

- (●) Yes
- ( ) No

1. APPROPRIATENESS

How appropriate are the proposed measures in this section to ensure a high level of privacy, safety and security for minors on platforms accessible to minors (as defined in the guidelines)?

- ( ) Not appropriate
- ( ) Somewhat appropriate
- ( ) Neutral
- ( ) Appropriate
- (●) Very appropriate
- ( ) I do not know

Please explain which measures and why.

1000 character(s) maximum

2. ADVERSE EFFECTS

2a. Do you believe that any of the measures in this section could have adverse effects on the privacy, security and safety of minors?

- ( ) Yes
- (●) No

Please explain which measures and why.

1000 character(s) maximum

2.b. Do you believe that any of the measures in this section have an undue impact on other children' s rights?

- ( ) Yes
- (●) No

Please explain which measures and why.

1000 character(s) maximum

3. COMPLETENESS

Are there any important aspects that are missing from the proposed recommendations in this section?

1000 character(s) maximum

4. SUGGESTIONS

What are your suggestions to improve the text in this section?

2000 character(s) maximum

5. ADDITIONAL COMMENTS

2000 character(s) maximum

Additional contribution

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