

17 April 2024

Statement: Children's Rights at the Centre of EU Digital Policy in 2024-2029

We the undersigned 20 children's rights organisations, in view of the upcoming Conclusions on the future of EU digital policy, urge Council members to ensure that children's rights are a priority for all Union's action on the digital environment. To protect and promote children's rights in the digital environment, by design and default, we call on the Council to:

- **Prioritise children's rights in the development, implementation and enforcement of all relevant digital policies, legislations and initiatives**, by referring to the UNCRC [General comment No. 25 on children's rights in relation to the digital environment](#) and its principles – notably that all children (i.e. under 18) are entitled to all their rights everywhere they are online, by design and default, and that businesses are responsible for prioritising their rights over commercial interests.
- **Prioritise the robust, coherent and effective implementation and enforcement** of existing policies and legislation, notably:
 - o the Better Internet for Kids+ Strategy, with initiatives to empower children and caregivers, promote age-appropriate experiences for children through child-rights based design of products and services, as well as their active and meaningful participation;
 - o the General Data Protection Regulation (GDPR), with concrete, clear and harmonised guidelines on how to apply its provisions to children;
 - o the Digital Services Act (DSA) and the AI Act with relevant guidelines, codes of conduct and practice to ease coordination of national authorities and ensure that all provisions on children are duly enforced across the EU, based on existing best practice.
- **Address existing regulatory gaps, notably on the fight against online child sexual abuse and exploitation.** The Council should ensure strong criminal legal frameworks at national level and focus on delivering a strong and effective EU Regulation that enables online platforms to effectively prevent the risks and stop the dissemination and proliferation of child sexual abuse on their services. The EU must act swiftly to ensure companies can detect, remove and report child sexual abuse before the expiry of the extended Interim Regulation in April 2026, to ensure there is no gap in protecting children online from this heinous crime. The Council should also further recognise the heightened risks stemming from digital services and products to children's specific rights and vulnerabilities as consumers and the upcoming Digital Fairness Fitness Check, especially as regards education technology, video-games, and virtual worlds, thus ensuring that all products and services likely to be accessed by or impact on children meet the highest safety and privacy standards by design and by default.
- **Develop EU tools to foster compliance and investment in innovation, notably technical standards** for privacy-preserving, effective, proportionate, and risk-based **age-verification and age assurance solutions** to ensure that children are safe but not excluded from any service that they have the right to access.
- **Integrate and streamline children's rights in the work around all relevant digital policies**, to enhance coordination between and within different EU institutions, directorates, units and teams working on children's rights and digital policy, including by ensuring child participation and consult regularly with children's rights organisations. As experts of their own lives, more

than ever in digital contexts, we emphasize that legislators must listen to children's views and duly take them into account in all policy and legislation affecting them.

We trust that the Council will consider the foregoing priorities to be a cardinal direction of future EU digital policies in the upcoming 2024-2029 legislature.

Sincerely,

Signatory organisations and individuals:

5Rights Foundation
A Little Lining Comes
Børns Vilkår
BRIS
CAMELEON Association France
Child Helpline International
COFACE
Deutsches Kinderhilfswerk e.V.
ECPAT Austria
ECPAT International
Eurochild
FICE Croatia
Hintalovon Foundation – ECPAT Hungary
Irish Society for the Prevention to Cruelty to children (ISPCC)
Lucija Vejmelka (Eurochild individual member)
Protect Children / Suojellaan Lapsia ry
S.O.S Il Telefono Azzurro
Terre des Hommes International Federation
The Smile of the Child
Thorn