Eurochild's position on age restrictions on social media

A call to rethink the business model of social media to address risks for children

Position Paper

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1. Introduction

Conversations at the global, EU, and national levels about whether to restrict children's access to social media should be used as an opportunity to assess the role these platforms play in children's lives and to push for meaningful reform that tackles the mechanisms driving short- and long-term harm.

The European Union is increasingly focused on strengthening platform accountability, including through enforcement actions under the Digital Services Act, such as the European Commission's opening of formal proceedings against TikTok and Meta. Recent litigation in the United States reflects growing scrutiny of platform design, with hundreds of plaintiffs alleging that large social media platforms intentionally built addictive products that harm young users' mental health.

There is momentum to discuss how companies can prioritise children's rights over profit and **uphold them not as an optional add-on, but as a condition for operating in European countries**. **Safety by design** is central to children's digital experiences and should be a baseline requirement for all platforms and a **driver of competition**.

Above all, platforms must be pushed to **improve the digital environment for children**, and to collaborate with researchers, civil society organisations, and children themselves through meaningful consultation and participation to create services that genuinely support children's rights and prevent a wide range of harms. **The goal should be to maximise benefits while minimising risks.**

Society already accepts age limits where activities pose meaningful risks to children's health, safety, or development. The same principle applies here: **the question is not whether every child is harmed in the same way**, but whether the **overall risk profile of some mainstream social media**, combined with the scale of exposure, justifies a **protective baseline**.

The choice is not simply between a "ban" and "no ban". That framing obscures the real issue. The real choice is whether we accept a digital environment designed around profit and attention capture, or insist on platforms that are accountable, transparent, and safe by design for children. This paper argues that age restrictions alone won't keep children safe. Therefore, the EU should prioritise children's rights-based, safe-by-default regulation that addresses platforms' risk-driving business models and design choices, making platforms safer for children and, in turn, safer for everyone.

This paper does not advocate a universal prohibition on children's access to social media, but proposes a rights-based framework to assess when and how age-related access conditions may be justified alongside structural platform obligations.

As the largest European network of organisations and individuals working with and for children, we ensure **the discussion remains rooted in children's rights**, while acknowledging that the **impacts of social media on children are evolving rapidly** and cannot be addressed exhaustively in a single paper.

This position has been prepared by the Eurochild Secretariat, based on **desk research**, **consultations with our 228 members across 41 European countries**, and **consultations with children** conducted directly by Eurochild and its members. It is also grounded in the EU framework, with a focus on the <u>DSA Guidelines on the protection of minors</u>.

2. A working definition of social media

<u>Social media</u> **are interactive digital services that enable users to create and share information, ideas, interests, and other forms of expression through online communities and networks.** For the purposes of this paper, "social media" refers to online platforms where user-generated content is **hosted and disseminated beyond one-to-one communication**, for example, through public or semi-public profiles, feeds, groups/pages, and recommender systems. While aware of their potential risks, this definition excludes services whose primary purpose is interpersonal communication (messaging, voice, or video calls).

The focus, in line with the Digital Services Act <u>Guidelines</u>, is on online platforms "accessible to minors", which includes services that are used by children, even if they are not specifically designed or intended for them, including Very Large Online Platforms (VLOPs). While this paper focuses on social media, similar risk-based considerations may also apply to other personalised digital services used by children, such as video-sharing and gaming platforms.

3. The business model of social media engagement

<u>Children</u> often say the digital environment is not designed with children in mind. Evidence from <u>whistleblowers</u> and wider public <u>reporting</u> has also shown that it is frequently intended first and foremost for commercial objectives. The core problem is not simply that social media can be harmful. It is that many platforms are **built to maximise** revenue within an **attention economy**. This business model drives design choices that increase risk exposure, particularly for children. This is also illustrated by <u>allegations</u> that individuals working for these companies have **described their products as "a drug"** and themselves as "pushers", according to internal communications and whistleblower testimony reported publicly.

Recent litigation disclosures have made public internal materials indicating the commercial **value of "young teens" and the prioritisation of teen engagement**, as well as internal recognition of compulsive use dynamics. Internal communications describe **"teens" as a top priority for platform growth**, and value "young teens" for long-term loyalty and refer to a "lifetime value ($270) per young teen".

These engagement-optimised designs are not neutral: they draw on well-known **learning mechanisms** that reinforce repeated checking and make disengagement harder, especially during key developmental stages, when children are particularly vulnerable to external influences. There is also increasing evidence that shows psychologists are employed by the tech industry to use persuasive design or behaviour design to boost children's social media use. Whistleblowers have repeatedly documented platforms **exploiting children's vulnerabilities**, including targeting ads based on their 'emotional state'. **This is a design choice made by the companies, which can be changed if there is a willingness to prioritise children's rights over profit.**

It is also important to note that the social media environment children encounter today differs from that in social media's early years. Some academics observe that modern platforms are **no longer categorised by their original 'social' features**, but serve as entertainment hubs and shopping venues. For those whose upbringing has coincided with the rise of social media as we know it today, the risk is that they become the **"test population" for products** designed to optimise attention and monetisation. Moves to legislate children's rights in the digital environment are targeting **a trillion-dollar industry** that has largely operated with limited and inadequate protections for the users from whom it has profited most.[1] The call to build a more human-centric social media environment, focused on safety, is a child rights imperative and has the potential to **benefit society as a whole. Designing platforms with children's safety as a baseline sets a higher standard for everyone.**

4. The context of the debate

Australia has pursued a strong approach to children's online safety since 2015, and from 10 December 2025, it is the first country in the world with a legislative framework (the so-called social media 'ban' or delay) that requires reasonable steps to prevent children under 16 from creating and having social media accounts on certain platforms. **It will be important to monitor implementation closely**, the practicalities of enforcement, unintended consequences (e.g., displacement to other services or unequal impacts on children who already face barriers offline), and the effectiveness of the age-verification tools.

The EU has a strong legal foundation for protecting children in digital spaces. The **Digital Services Act (DSA)** requires platforms accessible to minors to implement a safety-by-design approach, assess and mitigate risks to children, and prohibit behavioural advertising to

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[1] For instance, according to a recent study carried out in Denmark, five major platforms made an estimated 327 million DKK from Danish children in 2024.

minors. The **General Data Protection Regulation (GDPR)** provides enhanced protection for children's personal data and requires transparency in how it is processed. The **2024 AI Act** sets uniform rules to create a single market for trustworthy AI applications that fully respect fundamental rights, including children's rights. The **Audiovisual Media Services Directive (AVMSD)** mandates protections against harmful content and advertising for minors.

In response to the current child sexual abuse crisis, the EU adopted a **temporary ePrivacy derogation regulation** (extended until 2026, with a proposed extension until 2028). The EU is negotiating a **Child Sexual Abuse Regulation** to set platform duties to **prevent and tackle online CSA**, alongside a **recast CSA Directive** that updates **criminal offences, penalties and victim protection measures** across Member States.

Other relevant legal instruments include the **Digital Markets Act**, the **Unfair Commercial Practices Directive**, and the upcoming **Digital Fairness Act**, which is expected to curb dark patterns and exploitative commercial practices, especially those targeting children.[2]

Europe's current baseline is that children can access many social media services from **age 13, with parental consent**. In her September 2025 State of the Union address, the President of the **European Commission**, Ursula von der Leyen, warned against "algorithms that prey on children's vulnerabilities with the explicit purpose of creating addictions" and insisted that such systems should not be 'raising' Europe's children. She announced the formation of a panel of experts to advise on best practices for social media regulation.

The **European Council**'s conclusions from October 2025 underscore the importance of protecting minors, including the use of a ''digital age of majority for social media access'', while respecting national responsibilities.

During its November 2025 plenary session, the **European Parliament** adopted an own-initiative report focused on protecting minors online, where members called for ''the establishment of a harmonised European digital age limit of 16 as the default threshold under which access to online social media platforms should not be allowed unless parents or guardians have authorised their children otherwise.

5. Benefits of social media

The benefits often attributed to social media are largely replicable across other digital channels, since the fundamental drivers are human interaction and information access, which the internet provides in many forms. However, social media's design and ubiquity make certain experiences, **especially those requiring a large audience or diverse network**, more readily attainable than on other online platforms.

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[2] For a more comprehensive overview of the EU legislative framework on children's rights in the digital environment, please check Eurochild's subreport on children's rights in the digital environment.

Social media's unique features lie in its massive scale, public visibility, and network effects, which amplify outcomes such as widespread social connection, exposure to diversity, creative dissemination, and civic mobilisation.

> *"I use it to reach more people - you can talk to more people and connect with others."*
>
> **Maya, Romania, 16 years old**

Social media can <u>uniquely connect</u> children to large peer networks and niche support communities (e.g., global hashtag movements or <u>online support groups</u>) that have the potential to reduce loneliness and provide validation, especially for those experiencing multiple and overlapping forms of discrimination, such as LGBTQI+ and racialised children. Social media can **connect across existing social boundaries**, <u>**introducing children to diverse cultures, and broad communities**</u> beyond their offline world. **Audience diversity** is a unique feature of big social media: one can encounter and learn from people of many backgrounds in one place. Social media could play a big role in promoting societal-level inclusion (e.g., by **destigmatising topics** through widespread dialogue).

It also provides an **unprecedented audience** for child participation and expression. For instance, when a child posts opinions or artwork, they can potentially reach hundreds or more, gaining validation and feedback that shape identity. It also has the potential to offer many role models and communities that **help children find where they fit in** (seeing people with shared identities succeed). While similar benefits can be found in other online realms, the **scale and visibility** differ; social media might give more widespread recognition. At the same time, human cognition has <u>limited processing capacity</u>, and adolescents are particularly sensitive to social evaluation; at the scale enabled by personalised feeds, constant feedback, social comparison and exposure to distressing news can contribute to cognitive overload and **heightened stress**.

If we consider **public discourse and activism**, mainstream social media play a key role in giving youth a direct line to society. Social media uniquely excels at letting youth **broadcast and mobilise large networks**, which is why it has played a role in youth-led movements globally as well as nationally, thus **upholding children's civil and political rights, including children's rights to participate.**

Using social media can **build media literacy** (privacy awareness, online etiquette, content creation skills), and often serves as the first "training ground" for digital skills. However, arguments that children "need social media" to develop digital skills and the right to information deserve closer scrutiny**.** There is no good reason to treat **social media** as the exclusive gateway to essential digital skills. Strengthening media literacy must be understood as a whole-society responsibility: children, caregivers, and other adults all need the competence and ethical awareness to navigate digital environments responsibly.

> *"We need to focus on the situation of children in poverty, especially those without educational opportunities. In Ireland, there is no standard measure to educate children on social media. It's important to have standardised education."*
>
> **Ruth, Ireland, 16 years old**

6. The negative impact of social media on children

While findings vary across studies and contexts, research consistently highlights several pathways through which mainstream platforms can negatively impact children's rights.

Under the UN Convention on the Rights of the Child (UNCRC), children have the right to have their best interests treated as a primary consideration, to be protected from violence, to privacy, to health, education, and to access information and participate freely in society. Social media can undermine children's rights when platforms' design and business models expose children to harmful content and contact, targeted advertising and data exploitation, addictive or manipulative features, discrimination, and coercion. In practice, this means that risks in the digital environment can translate into real-world rights impacts, affecting children's safety, well-being, development, and equal opportunities. In line with the Committee on the Rights of the Child's General Comment No. 25 on children's rights and the digital environment, **it is necessary to enforce legislation against digital design that undermines children's development and rights.** Safeguards must be built into platforms by design and backed by enforceable rules, rather than relying on children and families to manage risks alone.

> *"If you want to be safe online, you shouldn't be on social media!"*
>
> **Child from the Netherlands**[3]

6.1   Engagement optimisation and developmental vulnerability

Social media platforms are intentionally designed to capture attention and encourage repeated use. One key reason they're so effective lies in how they interact with the **brain's reward-learning systems**. Social media can deliver small, rapid **rewards** (likes, comments, new content, notifications) that reinforce repeated checking through the brain's reward-learning systems. Importantly, **dopamine** is central to motivation and reinforcement learning**,** especially when rewards are unpredictable.

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[3] ECPAT International, Eurochild, & Terre des Hommes Netherlands (2024) Speaking up for change: Children's and caregivers' voices for safer online experiences.

> *"I think the platform steers my attention because it's built that way. They keep sending notifications, so you constantly return to the app."*
>
> **Maya, Romania, 16 years old**

When the brain receives more reward than expected, dopamine activity tends to increase, while when it receives less, it tends to decrease. These "reward prediction error" signals help the brain learn what to seek out and repeat, strengthening **learning and approach behaviours**. One reason variable, intermittent feedback can feel **compulsive** over time. That "maybe this time it'll be rewarding" feeling trains the brain to keep checking. Over time, it can become hard to stop because the system taps into normal learning mechanisms.

Unpredictable, intermittent rewards, such as those triggered by social media, are well known to produce responses that **persist for a long time even when rewards stop**, because the person is used to their unpredictability. This principle is exploited by slot machines.

> *"I keep scrolling… and in the blink of an eye, time has passed."*
>
> **Jake, Malta, 13 years old**

These dynamics may be **magnified in adolescence**, a sensitive developmental window, where frequent social media use may be associated with changes in brain regions implicated in emotional learning and regulation, and could increase sensitivity to social reward/punishment. Neuroimaging research also suggests that **peer approval cues** (including "likes" and social acceptance paradigms) engage reward-related regions such as the **ventral striatum**,[4] making socially validating content particularly reinforcing for young people.

The influence of peers also explains the emergence of viral "challenges" on social media, which, often in the form of dares or trends, have increasingly put minors at risk of serious harm. These challenges span multiple platforms and encourage youth to perform dangerous stunts, ingest harmful substances, engage in self-harm, or commit illegal acts, all for online attention and peer validation.

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[4] The ventral striatum is a key brain region influenced by dopamine signalling. It is also regulated by the medial prefrontal cortex, which is still developing during adolescence and early adulthood and plays an important role in planning and self-control.

> *''Trends and challenges where people are overeating are very popular among adolescents.''*
>
> **Jake, Malta, 13 years old**

6.2 Problematic social media use

According to a Joint Research Centre policy brief from 2022, on a typical weekday, <u>96% </u>of 15-year-olds in the EU engaged in social media activities, with **37%** spending **over three hours per day** browsing social media platforms.

> *"You swipe, swipe, swipe, and you don't realise how much time has passed. For example, I say I will stop at 5:30, and then it is 5:35… You just keep scrolling. Maybe they could implement something where, once in a while, the algorithm tells you: 'It's time to stop - you've been here for a while.' Instead of showing random videos, they should show more studying motivation content."*
>
> **Elena, Malta, 16 years old**

<u>Studies</u> (often cross-sectional) suggest that frequent and longer use (hours per day), and particularly **problematic media use behaviours**, are associated with reduced functional and structural connectivity in adolescence. <u>Findings </u>include reduced connectivity in brain regions involved in attention and control networks, alongside activation in reward regions. These results align with adolescent sensitivity to reward.

Because childhood and adolescence are sensitive periods for reward learning and habit formation, repeated exposure to highly reinforcing, unpredictable reward cues may increase the risk of persistent, <u>**hard-to-break use**</u> **patterns later on**, even if it does not determine <u>outcomes </u>for every child.

An indirect effect of excessive use of social media is the **displacement of time** that could be spent doing **activities believed to be more valuable for cognition**, such as academic tasks (e.g., reading, homework), in-person social interactions, and the experience of boredom that might be a catalyst for creativity. It can also displace sleep and activity, especially when the use is habitual, emotionally driven, or designed to be difficult to disengage from. This also points to the need to engage in activities, hobbies, and play outside of the digital world.

6.3   The impact of short-form videos

The 'brain rot' phenomenon, an informal label for the cognitive fatigue and reduced focus people report after heavy scrolling, is increasingly echoed in research linking short-form video use to weaker attention and inhibitory control.

A **2025** systematic review and meta-analysis pooling **71 studies** including **98,000 participants** found that **heavier short-form video use** is **associated with poorer cognitive outcomes**, with the strongest links for **attention** and **inhibitory control/impulse control**. This aligns with concerns that rapid, **highly stimulating content can shorten attention span**, making slower-paced activities (like reading or homework) harder to engage with. In addition, recent studies have proven the link between frequent short-video use and poorer cognitive functioning. A 2024 study shows that regularly using short video apps might make people less likely to think deeply or critically, which could affect how they make decisions or judge information.

In a controlled study, participants exposed to short-video streams performed worse on a **prospective memory task** (remembering to do something later), showing a poorer **speed– accuracy trade-off** than other conditions. A 2025 experiment found that **fast, "unlimited" switching** between short videos significantly worsened prospective memory (remembering to do something you intended to do later) after interruptions, whereas limiting switching improved performance, suggesting that rapid context-switching is a key driver of the memory decline seen with short-form video feeds.

6.4   Mental health

The evidence on the effects of social media on children's mental health is limited by gaps in **longitudinal and causal research**. In a 2024 systematic review and meta-analysis of 143 studies, few focused on clinical populations, and those that showed a positive association between social media use and internalising symptoms. **Addiction-like and compulsive use** trajectories predict worse mental health and **suicidal ideation/behaviours**, while **baseline total screen time may not**.

Platforms could, in principle, improve routes to help, for example, by providing clear signposting to local, specialised mental health support. However, available evidence suggests that signposting and supportive pathways are inconsistent in practice, and that young people searching for help can be steered towards harmful adjacent content via hashtags and recommendations. The growing integration of chatbots adds further risk: evaluations of mental-health chatbots and general-purpose systems find variable quality, limitations in crisis recognition, and the potential for misleading or unsafe responses in high-stakes contexts.

Amnesty International found that TikTok's recommender system can quickly push teenage users into "rabbit holes" of depressive and self-harm content. In tests using accounts registered as 13-year-olds, feeds became dominated by mental-health and suicide-related material within minutes to hours, with algorithmic amplification intensifying exposure over

time. The organisation argues this reflects systemic design risks and potential failures to meet obligations under the Digital Services Act to protect children from harm.

Additionally, from a societal standpoint, this can be seen as a warning sign: it points to **gaps in the offline support** children receive from families, schools, communities, and services, and to limited preventive measures. While it can be complementary, it is necessary to highlight that the presence of online support and information on mental health, including on social media, **should never be seen as a substitute for signatories to the Convention on the Rights of the Child's responsibility** to ensure the highest attainable standards of health, including mental health.

6.5 Appearance, social comparison and validation on image-based platforms

Image-based platforms can sharpen **appearance focus** and **upward social comparison**, especially when filtered/edited images are presented as everyday norms and paired with highly visible engagement metrics (likes, views, followers). Experimental and longitudinal evidence suggest that exposure to appearance-ideal social media content can worsen body image outcomes.

That **appearance comparison and internalisation are key mechanisms** (though effects vary across individuals and contexts). As adolescence is a period of heightened sensitivity to peer feedback, quantifiable metrics can make "social status signals" salient, amplifying the pull of external validation. Where platform systems disproportionately feed appearance-related or "eating-disorder-adjacent" material to teens already reporting body dissatisfaction, this can compound vulnerability and reinforce harmful spirals.

> *"Even when I say 'not interested', new videos still promote unhealthy diets - almost starving - and it sticks with me."*
>
> **Maya, Romania, 16 years old**

Current evidence suggests that girls are disproportionately exposed to appearance-focused content linked to thinness and dieting, while boys are increasingly exposed to content promoting muscularity and performance ideals. Whistleblowers have shared about **cases of platforms identifying when adolescent girls removed photos of themselves and interpreted the deletion** as a signal of low self-esteem, triggering the delivery of beauty-related advertising.

> *"Lately, there's a bodybuilding trend. I've seen friends getting injured - for example, extreme through extreme runs and doing 100 push-ups."*
>
> **Jake, Malta, 16 years old**

6.6   Prioritisation of content for engagement

Children's personal data and behavioural signals serve as inputs to profiling, personalisation, and advertising systems. These practices can undermine children's rights to privacy, dignity and protection from exploitation, and place an unreasonable burden on children to "self-manage" complex data environments.

> **"Public accounts should not be the default for anyone under 18.''**
>
> **Ruth, Ireland, 15 years old**

Platforms may not create most user-generated content, but they **do decide how content is ranked and recommended**. In practice, recommender systems are often optimised for engagement (e.g., clicks, reactions, watch time), and based on data inferred through profiling (age, gender, location, sexual orientation, etc.), which can systematically **favour content that triggers strong emotional responses and keeps users scrolling.**

A growing body of research shows that engagement-based ranking can **amplify emotionally charged and polarising content**, including anger and out-group hostility, compared with non-ranked (chronological) baselines. There is also evidence of platforms weighing reaction emojis (including "angry") more heavily than "likes," a design choice that can push more provocative content.

Engagement-optimised recommendation systems and auto-feeds can make **violent and other harmful content difficult for children to avoid**, increasing the likelihood of repeated exposure and normalisation. In England and Wales, a large survey of 13-17-year-olds found that 70% encountered real-life violent content online in the past year, and one quarter of exposed respondents said they saw it because platforms promoted it via feeds and "For You" recommendations. UK regulator-commissioned research similarly finds that children often encounter violent content unintentionally through feeds, group chats and recommender systems, with older children reporting greater desensitisation.

6.7   Exposure to discriminatory and polarising content

Social media can expose children to **racist, sexist, homophobic, ableist and otherwise discriminatory content and behaviours**, and, through repetition, social reinforcement and algorithmic amplification, can contribute to the sense that such ideas are mainstream or acceptable. Research on social media discrimination links exposure to negative well-being outcomes. More broadly, a growing body of evidence examines how personalisation and recommender systems can contribute to **echo chambers/filter bubbles**, shaping attitudes and hardening stereotypes over time (though effects vary by context and user behaviour).

These dynamics matter in a broader context in which multiple surveys and studies observe a **widening gender gap** among younger cohorts on gender equality and related attitudes in several countries. **The risk is not that platforms "cause" ideology** on their own, but that

algorithmic curation and engagement incentives can help create separate cultural lanes, reinforcing different norms, identities and "common sense" among groups of young users.

Short-form video recommender systems can steer young users quickly toward **harmful gender content**. A study by Dublin City University found that it took, on average, **about 23–26 minutes** of watching for new "young male" accounts to be recommended toxic or misogynistic content on TikTok and YouTube Shorts. Related research argues that these recommender dynamics can contribute not only to exposure, but also to normalisation, with the manosphere, including misogynistic narratives framed as entertainment, advice, or "self-help.''

Alongside overt misogyny, softer lifestyle content can also reinforce restrictive gender norms. The **"tradwife"** ("traditional wife") trend is often packaged as aesthetics and self-improvement, but scholarship and recent analysis highlight how it can promote narrow, heteronormative femininities and, depending on the creator ecosystem, be pulled into broader **anti-feminist narratives**.

6.8 Misinformation and synthetic content

Generative AI is making misinformation and disinformation **cheaper to produce, faster to spread, and harder to verify**. Synthetic text, images, audio and video ("deepfakes") can look and sound authentic, lowering the effort needed to create convincing hoaxes, impersonations or staged "evidence", and increasing the risk of confusion, manipulation and erosion of trust.

When recommender systems prioritise engagement over reliability, and synthetic content blurs the line between evidence and fabrication, **children's ability to seek, receive and trust information is undermined.** This is especially evident as social media becomes a default route to information, with 65 % of respondents to a Flash Eurobarometer survey aged between 15 and 24 saying social media was their main source of information.

Disinformation and extremism together can foster online radicalisation. What used to take months or years now often occurs within days or hours, mainly because of the widespread use of extremist short-form online content.

6.9 Data concerns and commercial manipulation

When platforms treat young teens as high long-term value users, the incentive is to increase retention and monetisation, often through intensive data processing (profiling, optimisation, and recommender feedback loops). In that context, children's privacy risks arise from routine product and advertising systems designed to collect behavioural data and keep users engaged. Even when a platform is "free," it is typically funded by a combination of advertising and engagement-driven growth strategies that depend on **behavioural data**.

Marketing on social media often blurs the line between **advertising and participation**, particularly through influencer content, native ads, affiliate links and branded "challenges" that look like ordinary peer activity. The persuasive intent is frequently opaque. Children can also struggle to recognise and interpret disclosures even when they exist. Experimental

research on sponsored influencer videos shows that disclosures can improve adolescents' persuasion knowledge, but effectiveness depends on age and disclosure type, and does not fully eliminate persuasion effects, meaning adolescents may still be influenced even when they understand content is sponsored.

Beyond content, sophisticated commercial practices are increasingly embedded in interface design. **Dark commercial patterns** exploit behavioural biases to steer users towards actions that are not in their best interests (e.g., staying longer, sharing more data, spending more, or clicking through). Children are recognised as particularly vulnerable to these design tactics, including in apps and games where monetisation and engagement are tightly coupled.

One-sided parasocial relationships can increase trust and susceptibility to persuasion. Children are increasingly exposed to "finfluencers", content creators providing financial advice on investing, which can be misleading and biased or promote high-risk/complex products, often promoting high-risk products (including crypto-assets), encouraging "get rich quick" narratives, or failing to disclose conflicts of interest. EU and international regulators have issued specific warnings: The European Securities and Markets Authority (ESMA) has reminded creators that "investment recommendations" on social media can trigger legal obligations (including around transparency and market manipulation risks). This becomes even more acute when children are turned into **"kidsfluencers"** (or featured in "family influencing" and parent influencers) and their image is used for commercial gain: the child's everyday life can be treated as content, blurring play and work, and raising child rights concerns around **privacy, dignity, best interests and protection from exploitation**, including how earnings are managed and whether the child can later withdraw consent.

Additionally, while **social media influencers** can be an important source of health information for adolescents, their lack of expertise and commercial interests pose challenges for adolescent health, including the risk of promoting unhealthy body images, promoting unhealthy diets and food and also substance use, inaccurate diagnosis or treatment advice. This poses a double risk for youth with a body still in development, but also to their mental health (e.g. eating disorders).

6.10 Harms driven by interaction

Contact risks arise when children **interact with others online**, rather than merely encountering content. In the OECD framework, these risks include hateful encounters, interactions intended to harm, criminally prosecutable conduct, and problematic encounters that do not fit neatly into the previous categories. On social media, where profiles are discoverable, contact is frictionless, and private messaging is central, these risks can escalate quickly.

A key contact risk is **sexual solicitation and grooming**, which can lead to coercion, image-based abuse and **sextortion**. EU Kids Online data shows that a substantial minority of adolescents report receiving sexual messages. These harms are amplified by private messaging and group chats, where offenders (and sometimes peers) can build trust, isolate a child, and apply pressure with reduced visibility.

> *"For messaging apps, there could be different age groups. If you are under 13, you should never be able to share personal information or pictures. For older children, sharing photos could be limited to friends only."*
>
> **Denis, Bulgaria, 16 years old**

Contact risks also include coercion within <u>closed or invitation-only groups</u>, where children may be pressured to view, share or participate in harmful exchanges. <u>Europol</u> has raised alarms about networks circulating extremely violent material and using coercive dynamics to control victims, while law enforcement warnings highlight patterns of threats and blackmail within organised online groups. At <u>least five Dutch girls</u> attempted suicide after pressure in sadistic chat groups.

6.11 Who is most affected: vulnerability and inequality

Social media <u>is not experienced equally</u>, and there is a need for **more disaggregated data on how it impacts various groups of children** and how social media might exploit children's vulnerabilities, as well as potentially support specific groups. The risks are shaped by structural factors and inequalities.

- Children who are economically disadvantaged may spend more time on digital technology and receive less supervision and support.

- According to research conducted by <u>Terre des Hommes The Netherlands</u>, Children with disabilities and experiencing mental health challenges are also more likely to support social media restrictions, due to their impact on their wellbeing.

- Children from specific groups, including children in alternative care, LGBTQI+, and children with a migrant and ethnic minority background, can face heightened risks, while also sometimes benefiting more from community-building and support.

- Children facing greater challenges in life (lack of parental support, poor mental health, relationship difficulties, poor relationship with their parents).

- Children who use digital tools without supervision and children who are not informed about the risks are particularly vulnerable, especially when their parents are not aware of the dangers these technologies can pose to their development.

- While many preventative and protective mechanisms rely on close adult supervision around the child, those who are deprived of parental care might be excluded.

- Children with pre-existing mental health difficulties, experiences of exclusion, or limited offline support may be more likely to experience negative effects.

- Those at the intersection of multiple vulnerabilities may face the greatest risk and warrant special consideration.

Even where opportunities exist, the current ecosystem can come at a **high cost for children and society**, with short- and long-term implications across a wide range of rights and well-being outcomes. It is crucial to ensure the maximisation of the benefits, while addressing the risks these groups of children might experience.

7. Eurochild's key messages and recommendations

7.1 Age restrictions can never replace regulation or company responsibility

Age restrictions are not enough. **Core protections**, including the GDPR and the AI Act, <u>**must not be weakened**</u> by current attempts to simplify the EU legislative framework. The DSA must continue to be used to hold social media companies accountable and **ensure a high level of privacy, security, and safety for children**. The future Digital Fairness Act should explicitly address children's risks from dark patterns, addictive engagement features, harmful personalisation, coercive subscription journeys, exploitative game mechanics, and influencer marketing, banning or strictly restricting the most harmful practices for minors. Negotiations on the **Child Sexual Abuse** Regulation and Directive are also crucial, as sexual exploitation and abuse can occur across many services beyond social media, including gaming platforms and smaller services. **A social media ban alone would never address the wide range of risks to children's rights.**

7.2 Children's rights apply to everyone under 18, with safeguards that evolve by age

As a child is defined in the EU as anyone under 18, the rights enshrined in the United Nations Convention on the Rights of the Child should be upheld in the digital world, regardless of access restrictions or age of consent. Online services should therefore be held accountable for ensuring a high level of **safety, privacy and security** for all children. Introducing a new age threshold (e.g. 15 or 16) **must not result in safeguards being removed** for those below that threshold. Doing so would risk undermining children's rights and weakening protections precisely for those who may need them most.

7.3 Platform power requires structural accountability

Children differ in age, maturity and discernment, developmental stage, disability, and life context. But it is neither fair nor realistic to expect each child and guardian to "self-manage" platforms designed to be difficult to disengage from. **We need structural responses.** Just as **we do not rely on industry goodwill** to ensure safety in other sectors, social media companies should not be treated differently. **Protective design must be the default by law**, not an optional add-on. Design systems must align with children's rights and developmental needs, not override them.

7.4 Data extraction for behavioural advertising and engagement optimisation must end

The current business model treats **children's identities, emotions, and behaviours as monetisable assets**. This violates their rights to privacy, dignity, and protection from exploitation. **Stronger enforcement** of the GDPR and the implementation of the DSA, which bans targeted advertising, and the AVMSD's obligation to ensure that platforms protect children from exposure to content likely to harm minors' physical, mental, or moral development are urgently needed. Social media services collect and sell user data and attention to advertisers, turning users into commodities. While companies must not use minors' data for commercial purposes, it is also crucial to **raise awareness of the issues of sharenting and childfluencers** to protect children's privacy, dignity, and protection from exploitation.

7.5   The business model must change: reduce harm at the source

It is crucial to change how platforms operate. A paradigm shift is needed, away from systems that thrive on attention extraction, commercial manipulation, and risk amplification. This requires **eliminating harmful, persuasive, and deceptive design patterns** (e.g. autoplay, infinite scroll, manipulative nudges), restricting profiling, targeting, and opaque recommender systems, and subjecting high-risk systems to independent child-impact audits. **Oversight bodies must establish minimum criteria that platforms must meet to operate within national jurisdictions and across the EU.** It is essential to conduct an independent, risk-proportionate framework that evaluates platform suitability based on user age, as well as cognitive, social, and relational development, to potentially include more platforms, such as gaming platforms, if risks are established and they are accessible to minors. **Risk assessments conducted under this framework should systematically evaluate the "5 Cs" threat model.** Greater harmonisation of national legislation, along with international cooperation, is essential to close loopholes that currently enable the dissemination of harmful content.

7.6   Social media should be safe by default

It is reasonable to assume that children will <u>circumvent restrictions</u>, just as they do with other age-regulated products and behaviours. While this does not necessarily make them effective, restrictions do support social discussions and enable informed choices. There is no excuse for platforms to keep high-risk environments for "unregistered" users. Platforms must be **safe by default, with high privacy, safety, and content protections applied universally**, not only to logged-in profiles. All users using the platforms should be informed about reporting processes, relevant feedback and actions taken.

7.7   Regulation must be strengthened to make risk assessments independent and much more robust

While the DSA stipulates that VLOPS and VLOSEs must conduct risk assessments and risk audits, the exact requirements are vague, and the platforms have enormous discretion over how to interpret this requirement, thus creating a serious conflict of interest. Many "smaller" platforms used by minors are not required to conduct risk assessments at all, potentially exposing many millions of children to harm, and recent experience has shown that **at least some of the VLOPs have failed to take the requirement seriously**. **The EU**

framework must be updated to maximise the benefits of the risk assessment by mandating risk assessments for all digital environments according to detailed, comprehensive assessment templates developed by a European board of independent experts, taking account of the 5Cs framework of risks and the precautionary principle. The board, upon a detailed, evidence-based review of the risk assessments, would determine the appropriate minimum age for each environment, based on a tech neutral approach, and the platforms would be required to implement age-verification checks accordingly, using independent, privacy-preserving technology.

7.8   Independent access to platform data is essential, and more research is needed

After years of controversies and scandals, trust cannot be rebuilt without **independent scientific scrutiny** and **interdisciplinary research** combining survey data with objective platform data and (where appropriate) evidence from neuroscientific, developmental, psychological and sociological studies, as well as other relevant scientific fields. Researchers must be given meaningful access to platform data, beyond selective disclosures or PR. DSA provisions must be implemented robustly and, where necessary, expanded to support high-quality, interdisciplinary, child-centred research. A broader range of longitudinal research on the impact of social media on children is needed, including listening to and considering the perspectives of children in vulnerable situations.

7.9   Age assurance and verification tools should be aligned with children's rights

Age assurance can support children's online safety only when it is necessary, proportionate and rights-aligned. Age assurance tools should be accurate, robust and privacy-preserving; self-declaration alone is not an adequate safeguard. Any decision to introduce age-gating should be based on a transparent, proportionate assessment and should be strictly limited to confirming whether a user is above or below a relevant age threshold, without enabling profiling or additional data collection. Where used, age assurance must operate alongside wider risk-mitigation measures and never as a standalone solution. Crucially, age assurance should always operate **alongside broader safety-by-design obligations** and never be relied upon as a standalone or definitive protection measure. Platforms must remain responsible for ensuring a high level of safety, privacy and protection for all children, including those who circumvent access restrictions or use services without registration.

7.10   States cannot outsource their obligations under the UNCRC to platforms

No digital platform can substitute for governments' responsibilities to uphold children's rights as enshrined in the UN Convention on the Rights of the Child (UNCRC). It is worth asking whether social media has filled a **vacuum grounded in the failure of the actors involved to support children, especially those in vulnerable situations**. For many children, these platforms have become a **default substitute** for safe community spaces, youth services, mental health support, meaningful participation, and real-world connections. This

is not acceptable. In line with the Committee on the Rights of the Child's General Comment No. 16 (2013) on State obligations regarding the impact of the business sector on children's rights, States must not **delegate core responsibilities to the private sector**. Instead, they must invest in and guarantee **offline and online opportunities** that support children's development, well-being, participation, and protection.

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