

Eurochild's contribution to the Action Plan on the Protection of Minors against Crime

Policy Paper



Eurochild
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the heart of Europe

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Eurochild welcomes the European Commission's initiative to develop an Action Plan to protect children from crime. The Action Plan should strengthen the EU's approach to protecting children and ensure that **children affected by crime are treated first and foremost as children.**

The Action Plan must recognise that children may come into contact with crime in different ways: as victims, witnesses, alleged offenders, perpetrators, or, often, as children who are at the same time victims and perpetrators. This is particularly important for children who have experienced violence, exploitation, neglect, poverty, discrimination, trauma, migration, family conflict, institutionalisation or social exclusion.

It should also be grounded in children's rights, with a focus on their rights of access to justice and to an effective remedy. Access to justice¹ is not only about access to courts² but also about children's ability to obtain timely, effective and child-sensitive remedies when their rights have been violated. This requires legal empowerment, child-friendly information, appropriate legal and other assistance, safe complaint mechanisms, and procedures adapted to children's age, maturity and circumstances.³

When children come into contact with the justice system, this reflects a failure of prevention, protection and support by the State. The Action Plan should therefore treat this issue as a child protection concern requiring early intervention, integrated support, diversion, rehabilitation and alternatives to detention.

The Action Plan should avoid and condemn narrow security-based or punitive approaches. Instead, it should prioritise prevention, early identification, integrated support,⁴ rehabilitation, restorative justice, child-friendly procedures, and alternatives to detention. It also requires a life-cycle approach, especially as children are ageing out of child protection systems into youth and early adulthood.

Protecting children against crime requires a whole-of-society response, involving close cooperation among the child protection and education sectors, health and mental health services, social protection, justice systems, law enforcement, digital regulators, civil society, families, communities, and children themselves. **People working with children in contact**

¹ Committee on the Rights of the Child (2024) Draft general comment No. 27 on children's right to access to justice and to an effective remedy

² Liefwaard, T. (2019) Access to justice for children: Towards a specific research and implementation agenda. *The International Journal of Children's Rights*, 27(2), 195–227.

³ Committee on the Rights of the Child. (2021). *General comment No. 25 (2021) on children's rights in relation to the digital environment* (CRC/C/GC/25). United Nations.

⁴ Eurochild (2024, June 19) *European Commission Recommendation to develop and strengthen integrated child protection systems.*

with the justice system should be specialised and regularly trained on how to interact with children.

1. Children's access to justice must be guaranteed across all systems they encounter

Access to justice applies to criminal, civil, and administrative proceedings, as well as to alternative and restorative justice mechanisms. It concerns children who are victims and witnesses of crime, children suspected of, accused of or recognised as having infringed criminal law, and children involved in proceedings concerning their care, protection and custody.⁵ The Action Plan should therefore avoid treating justice solely as a criminal justice issue and instead promote child-sensitive justice across all systems children encounter.

Children face specific barriers in accessing justice. They may not know their rights, not understand complex procedures, may lack child-friendly information, may be dependent on adults who are unwilling or unable to support them, or may face conflicts of interest with parents, guardians or institutions. Children may also be denied legal standing, legal capacity or independent legal representation.⁶ These barriers are particularly severe for children in vulnerable situations, including children in migration, children with disabilities, children in alternative care, children in poverty and children who have experienced violence or exploitation.

Eurochild members report serious gaps in the justice systems across Europe. In **Spain**, child-friendly procedures remain a pressing concern, particularly in cases involving sexual violence, where court procedures can be traumatising. **Slovenia** experiences delays and insufficient prioritisation of the child's best interests in judicial processes. In **Slovakia**, repeated interrogations and long waits for mental health services can further harm child victims, leading to re-victimisation. In **Italy**, the duration of legal proceedings remains a concern for safeguarding children's well-being. In **Portugal**, better coordination is needed between justice and child protection systems, while **Latvia** requires more specialised professionals in investigation and decision-making processes.⁷ The reform of the juvenile justice system is seen as a priority by the members in **Bulgaria**.⁸ In **England**, despite progress in some areas of the system recognising the need for a 'Child First' approach, urgent reform of the child justice system is needed.⁹ A recently published white paper commits to looking at the issue of the minimum age of criminal responsibility in England and Wales.

In **Serbia**, in 2025, there were 17,989 children in conflict with the law and systematic support for these children does not exist. There is a discrepancy between the urgency, complexity, and intensity of their needs and the slow, segmented responses of the social

⁵ Liefwaard, T. (2019) Access to justice for children: Towards a specific research and implementation agenda. *The International Journal of Children's Rights*, 27(2), 195–227.

⁶ Liefwaard, T. (2019) Access to justice for children: Towards a specific research and implementation agenda. *The International Journal of Children's Rights*, 27(2), 195–227.

⁷ Eurochild (2025) Flagship sub-report on child protection systems in Europe

⁸ Eurochild (2025) Unequal Childhoods: Rights on paper should be rights in practice

⁹ Eurochild (2025) Unequal Childhoods: Rights on paper should be rights in practice

protection and juvenile justice systems. In **Slovenia**, the judicial system does not pursue the best interests of children, and there is a need to improve child-friendly justice.¹⁰

In **Ukraine**, the system for protecting children who come into contact with the law faces several significant challenges related to the full-scale war and ongoing Russian aggression. New forms of crime affecting children have emerged, while cases of children being recruited and involved in criminal activities have increased. At the same time, the institutional and human resource capacity of child protection services, justice institutions, and courts remains limited. Many professionals working within these systems are experiencing high workloads and exhaustion, which affect the quality, timeliness, and effectiveness of responses and case management.

The Action Plan should call on Member States to strengthen child-friendly justice systems by ensuring age-appropriate procedures, trauma-informed mechanisms, specialised legal representation, access to mental health and psychosocial support, and the right of children to be heard in all proceedings affecting them. Children should have access to child-friendly information, advice, advocacy, support for self-advocacy, independent complaints mechanisms and courts, with the necessary legal and other assistance. Procedures should be timely, accessible, understandable, safe and adapted to the child's individual circumstances.¹¹ Staff who come into contact with children throughout the justice process should receive adequate, regular training in children's rights, child participation, safeguarding, and trauma-informed approaches to ensure that children are treated with dignity and respect at all times.

The Action Plan should therefore promote child-sensitive justice across all systems children encounter, ensuring that children can access information, legal assistance, complaints mechanisms, remedies and support in a way that is timely, understandable, safe and adapted to their age, maturity and circumstances.

2. Access to justice must be child-friendly, coordinated and trauma-informed

Eurochild is deeply concerned by proposals in some countries, including **Austria**, to lower the age of criminal responsibility.¹² While a proposal to lower the age of criminal majority to 13 has been withdrawn in **Sweden**, a new proposal to lower it to 14 will be put forward after widespread criticism from civil society. These trends are in contradiction with the views of the Committee on the Rights of the Child, which urges States not to reduce the minimum age of criminal responsibility under any circumstances and encourages States to

¹⁰ Eurochild (2025) [Unequal Childhoods](#): Rights on paper should be rights in practice

¹¹ Liefwaard, T. (2019). Access to justice for children: Towards a specific research and implementation agenda. *The International Journal of Children's Rights*, 27(2), 195–227.

¹² Eurochild (2025) [Unequal Childhoods](#): Rights on paper should be rights in practice

set it at least at 14 years of age, with higher ages such as 15 or 16 years seen as more acceptable.^{13 14}

The Action Plan should also promote non-stigmatising language when referring to children alleged to have, accused of, or recognised as having infringed criminal law. Children should not be labelled in ways that define them by the offence, reinforce stigma or undermine their reintegration.¹⁵ Terms such as “child offenders”, “young offenders”, “juvenile delinquents” or “criminal minors” should be avoided. Instead, the Action Plan should use rights-based and child-centred language, such as “children in contact with the justice system”, “children alleged as, accused of or recognised as having infringed criminal law”, “children in conflict with the law”, or “children involved in criminal proceedings”. The Action Plan should draw on the Luxembourg Guidelines¹⁶ on Terminology for the Protection of Children from Sexual Exploitation and Sexual Abuse, which provide useful examples of how terminology can either protect children or reinforce stigma.

In **Kosovo**, the justice system remains heavily focused on security, while rehabilitation, education and reintegration are often neglected. Children may be placed in correctional centres despite court decisions mandating their placement in educational centres, and girls may be placed in centres with adult female detainees. In **Malta**, the Juvenile Court only deals with children up to age 16, which can result in harsher penalties and fewer age-appropriate interventions for those aged 16 to 18.¹⁷ In **Luxembourg**, children aged 11–17 are increasingly being detained in the Luxembourg Prison Centre, an adult prison, due to limited capacity in specialised youth facilities. Concerns include a lack of information on rights and detention length, limited access to lawyers and judges, adult-like detention conditions, minimal time out of cell, few educational or recreational activities, and psychological distress.

In **Luxembourg**, some children are detained for low-level offences, raising serious concerns about proportionality and the principle that deprivation of liberty should be used only as a last resort and for the shortest appropriate time. More broadly, Luxembourg’s youth protection system remains based on the 1992 Youth Protection Act and has not yet been fully reformed in line with children’s rights standards. Child protection and juvenile justice remain insufficiently separated; there is no clearly defined minimum age of criminal responsibility; and children aged 16 and over may be referred to ordinary criminal courts. Diversion, restorative justice and community-based alternatives remain underdeveloped,

¹⁴ Committee on the Rights of the Child (2021) *General comment No. 25 (2021) on children’s rights in relation to the digital environment* (CRC/C/GC/25). United Nations.

¹⁵ Committee on the Rights of the Child (2021) *General comment No. 25 (2021) on children’s rights in relation to the digital environment* (CRC/C/GC/25). United Nations.

¹⁶ [Greijer, S., & Doek, J. \(2025\) Terminology guidelines for the protection of children from sexual exploitation and sexual abuse \(2nd ed.\). ECPAT International.](#)

¹⁷ [Eurochild \(2025\) Flagship sub-report on child protection systems in Europe](#)

reflecting a broader punitive approach that too often responds to children's vulnerability with repression rather than care and support.

The Action Plan should promote restorative justice, mediation, diversion, educational measures and alternatives to detention. Diversion should be available from the earliest possible stage. It should be the preferred way of dealing with children in most cases, provided that children's rights and legal safeguards are fully respected. Diversion must be voluntary, based on adequate information, free from intimidation or pressure, and subject to review. It should never involve deprivation of liberty or result in a criminal record. Crucially, children should not be placed in settings with adults.

The Action Plan should also require regular and ongoing training, including refresher training, for all professionals likely to come into contact with child victims or children in contact with the justice system. Training should cover children's rights, child development, trauma-informed practice, child-friendly communication, safeguarding, non-discrimination, gender-sensitive responses, online and offline forms of violence and exploitation, and how to avoid victim-blaming or stigmatising language.

3. The Action Plan must address root causes and strengthen integrated child protection systems

A recurring problem across Member States is fragmentation between services. Children affected by crime may come into contact with schools, social workers, police, courts, health services, shelters, migration authorities, helplines, hotlines and digital platforms, but these actors often operate in silos. This can lead to late identification, repeated questioning, secondary victimisation and gaps in support. For instance, members from **Portugal** describe children's participation in the justice and protection systems as 'very disappointing' and recommend strengthening collaboration between the justice and protection systems.¹⁸

Luxembourg still lacks a fully integrated child protection system with clear multidisciplinary pathways across child protection, mental health, education, residential care, justice and police. In practice, children in need of care and protection may be channelled into closed or restrictive settings, while prevention, early intervention and coordinated follow-up remain insufficient.

Re-victimisation also remains a serious and recurring risk for children. Children may be required to repeat their account several times to different professionals, undergo poorly coordinated assessments, face delays in referral or support, or encounter professionals who are not adequately trained in child-friendly, trauma-informed and rights-based approaches. This can deepen trauma, discourage disclosure and undermine children's trust in institutions.

Such re-victimisation is often linked to a lack of clarity about roles and responsibilities across sectors. When it is unclear who is responsible for identification, referral, information

¹⁸ Eurochild (2025) Unequal Childhoods: Rights on paper should be rights in practice

sharing, support, evidence gathering, or follow-up, children can fall between systems or be exposed to unnecessary and harmful repetition. The Action Plan should therefore promote clear inter-agency protocols and referral pathways between health services, social services, child protection authorities, law enforcement, prosecutors, courts, schools and specialist support services.

The Action Plan should promote integrated child protection systems, including clear referral pathways, multidisciplinary cooperation and child-centred case management. Models such as Barnahus and other child-friendly, multidisciplinary and interagency services should be supported and scaled up where appropriate. Schools and community settings should be recognised as key spaces for early identification and referral. Professionals should receive adequate training, and reporting pathways should be safe, child-sensitive, and trusted.

The Action Plan cannot be separated from broader social, economic and structural factors. Poverty, exclusion, discrimination, housing insecurity, disability, migration status, family conflict, lack of access to education, institutionalisation and limited access to support services can all increase children's exposure to violence, exploitation, recruitment and criminalisation.¹⁹

The Action Plan should therefore place prevention at its centre. Prevention should address the conditions that expose children to harm and reduce their access to protection. In line with the European Child Guarantee, this should include investments in inclusive education, early childhood support, mental health services, family support, community-based services, safe housing, social protection and integrated child protection systems. Prevention should also include closing pathways into the child justice system. Additionally, the Action Plan should condemn the criminalisation of status-related behaviours, such as running away, begging, school absence, or other conduct that would not be treated as an offence if committed by an adult.²⁰

4. Children in vulnerable situations require targeted protection and support

The Action Plan should pay particular attention to children who face heightened risks of victimisation, exploitation, recruitment or criminalisation. These include children living in poverty, children with disabilities, children in alternative care, children with a migrant background and minority ethnic origin, children deprived of liberty, children experiencing homelessness or housing exclusion, LGBTQI+ children, and children facing family conflict or violence at home.

Children in migration are particularly exposed to situations where child protection is treated as secondary to migration control. When children are excluded from education, housing, legal support, health care or child protection systems, they may become more vulnerable to exploitation, trafficking, grooming or recruitment into criminal networks. Unaccompanied children may remain dependent on smugglers or other exploitative adults, while children

¹⁹ Eurochild (June 2025) [Eradicating child poverty in Europe](#).

²⁰ Committee on the Rights of the Child (2021) *General comment No. 25 (2021) on children's rights in relation to the digital environment* (CRC/C/GC/25). United Nations.

with insecure residence status may fear approaching authorities even when they are victims of crime.

Similarly, experiencing the care system heightens the vulnerability of children to come into contact with the justice system. According to the [UK Office for National Statistics \(ONS\)](#), 52% of those who had been in care had a criminal conviction by age 24, compared with 13% of children who had not been in care.

The Action Plan should explicitly uphold the principle that children should never be criminalised for offences they were forced or exploited to commit. This is particularly relevant for children who are trafficked, forced into drug-related offences, sexual exploitation, the use of false documents or other forms of exploitation. The principle of non-punishment must be applied effectively in practice.

Children with disabilities also face significant barriers to protection and justice. They may be more exposed to violence, institutionalisation, coercion or neglect, while facing inaccessible reporting mechanisms, lack of reasonable accommodation and insufficiently trained professionals. The Action Plan should ensure that all prevention, reporting, justice and support measures are accessible to children with disabilities.

In **Luxembourg**, children who are victims of sexual exploitation may still be placed in the *Centre socio-éducatif de l'État* (State Socio-Educational Centre, CSEE), meaning that child victims can end up in a closed setting instead of receiving specialised protection and recovery support. Transfers from psychiatry or residential care to the CSEE may also be ordered without adequately hearing the child and without child-sensitive procedural safeguards.

5. Racial profiling, discriminatory policing and over-criminalisation must be addressed

The Action Plan should recognise that discriminatory policing and racial profiling can expose children to harm and undermine their trust in justice and protection systems. Stop-and-search practices without reasonable justification and based on ethnicity, perceived origin, religion or racialised appearance violate human rights. For children, particularly those from racialised, migrant, Roma or Muslim communities, such practices can translate into humiliation, fear, exclusion from public spaces and a lasting perception that justice systems are not there to protect them.

Evidence from across Europe points to discriminatory policing practices. In **France**,²¹ police have been reported to disproportionately target individuals based on skin colour or perceived ethnic origin, particularly young people assumed to be Black or Arab, including children. Similar concerns have been reported in **Greece** and other EU countries by the EU Fundamental Rights Agency.²²

²¹ Human Rights Watch. (2020, June 18). [“They talk to us like we’re dogs”: Abusive police stops in France.](#)

²² European Union Agency for Fundamental Rights. (2024, April 10). [Addressing racism in policing](#)

In **England and Wales**, between March 2023 and March 2024, approximately 103,100 stop-and-searches involved children.²³ Among those with recorded ethnicity, Black children made up 19% of searches and were the only group over-represented. More than three-quarters of stop-and-searches of children resulted in no further action. Black children are also six times more likely than white children to be strip-searched by police. Racialised children make up 51% of those imprisoned. Racist narratives of ‘aggression’, alongside adultification, follow Black children throughout the systems they engage with, constructing them as risks to the public.²⁴ Data published in June 2026 also show clear ethnic disparities in access to diversion. In England and Wales, white children are twice as likely to receive diversion with YJS involvement as Black children (53% vs 27%).

People from ethnic and migrant backgrounds are often denied access to diversionary services. In England and Wales, white children are more likely to receive responses rather than social support for similar offences, compared to those without such backgrounds.²⁵ In **Italy**, while children with a migrant background represented less than 8% of the total children in 2018, they accounted for 36% of those in youth detention centres. Notably, few migrant children benefited from the measures introduced to reduce prison admissions at the onset of the COVID-19 pandemic.²⁶

Studies in the **Netherlands** find Moroccan and Turkish youths significantly overrepresented in pre-trial detention and sentenced cohorts compared to native Dutch peers, even when controlling for offence type. Although youths with a non-Western immigrant background make up only about 12 % of the general 18–24 population, they account for some 35 % of young people in detention facilities in the Netherlands.²⁷ Youth with a migration background in the **Netherlands** are significantly less likely to be released from pre-trial detention compared to their native Dutch peers. A Dutch quantitative study found that both youth with a migration background and those with intellectual disabilities are less likely to receive positive release recommendations from the Child Protection Service, influencing judges’ decisions. These youth are also disproportionately held in remand detention for similar offences.²⁸

In **Luxembourg**, cases were also documented where Romani children showing clear indicators of trafficking were treated as offenders rather than potential victims, without activation of the national referral mechanism. They were later released without specialised follow-up or systematic cross-border cooperation with child protection authorities in France, where they lived.

²³ Youth Justice Board for England and Wales & Ministry of Justice. (2025, January 30). Youth justice statistics: 2023 to 2024. GOV.UK.

²⁴ Eurochild (2025) Unequal Childhoods: Rights on paper should be rights in practice

²⁵ European Network Against Racism (2016) *Racism and discrimination in the context of migration in Europe: ENAR Shadow Report 2015–2016*. Brussels: ENAR.

²⁶ Ibid

²⁷ Veen, V. C. (2011). *Risk profiles of youth in pre-trial detention: A comparative study of Moroccan and Dutch male adolescents in the Netherlands* (Doctoral dissertation, Utrecht University). Utrecht University.

²⁸ Mastropasqua, I., Totaro, M. S., & Barberis, G. (2019). Minori stranieri e giustizia minorile in Italia. Gangemi Editore.

The use of biased technologies, including facial recognition and other AI-driven tools, may further exacerbate risks for children already subject to discrimination. The Action Plan should therefore call for strong safeguards, accountability, transparency and child-rights impact assessments in the use of policing technologies.

The EU should support Member States in ensuring independent oversight of policing practices, providing mandatory anti-racism and children's rights training for law enforcement, and strengthening complaint mechanisms that are safe and accessible for children.

6. Children's rights in the digital environment must be central to the Action Plan

Eurochild members report that online risks affecting children are widespread across Europe. These include child sexual abuse and exploitation, grooming, cyberbullying, cyber violence, sexual extortion, harassment, exposure to harmful content, algorithmic amplification of harmful material, and AI-generated abuse. These risks increasingly overlap with offline harm and with other forms of crime, including trafficking, recruitment, coercion and exploitation.

Cyberbullying is another growing concern. Members in **Croatia, Cyprus, Denmark, Estonia, Hungary, Ireland, Latvia, Luxembourg, Moldova, Romania, Scotland, Switzerland** and **Sweden** report an increase in cyberbullying, with children acting as both victims and perpetrators.²⁹ In **Luxembourg**, a recent study by the National Observatory for Children, Youth and School Quality (OEJQS) has shown that 1 in 3 children aged 12 and above is a victim of cyberbullying.

Cyberbullying and online sexual harassment can overlap and escalate into online child sexual exploitation and abuse. Gendered patterns are also visible: members in **Ireland** note that girls are primarily targeted by harassment and verbal abuse on social media. At the same time, boys are more often victimised on gaming platforms. We welcome the adoption of the EU Action Plan on Cyberbullying and recommend coherence between the two plans to ensure consistency, comprehensive actions, and a holistic approach.

Children are also exposed to harmful content, including content promoting self-harm, suicide, eating disorders, misogyny, extreme violence, pornography and gambling. Recommender systems can reinforce harmful situations by repeatedly exposing children to exploitative, abusive or discriminatory content, contributing to the normalisation of violence, exploitation or harmful behaviours. Research has shown that boys can encounter toxic and manosphere content within minutes of scrolling on social media. Social media can also expose children to racist, sexist, homophobic, ableist and otherwise discriminatory

²⁹ Eurochild (2026) Subreport on children's rights in the digital environment

content, which can be amplified through algorithmic recommendations and social reinforcement.³⁰

The Action Plan should recognise that digital risks are not limited to “content” but are often linked to platform design, recommender systems, algorithmic amplification, engagement optimisation, commercial incentives, weak reporting pathways, insufficient detection, lack of effective enforcement, and limited access to support. Children and parents cannot be expected to manage these risks alone. Responsibility must sit with platforms, regulators and public authorities.

The Action Plan should support strong implementation and enforcement of the Digital Services Act, the GDPR, the AI Act, the Audiovisual Media Services Directive, the future Digital Fairness Act and the forthcoming rules on preventing and combating child sexual abuse. It should promote safety by design, privacy by default, child rights impact assessments, robust risk assessments, independent audits, meaningful researcher access to platform data, effective reporting and redress mechanisms, and restrictions on harmful design features, profiling, and behavioural advertising targeting children.

The Action Plan should also address the growing use of online spaces by criminal groups, violent communities and extremist networks to attract, manipulate and recruit children. Europol³¹ has warned that organised crime networks increasingly use social media, encrypted messaging services and other digital tools to recruit minors into criminal activity. At the same time, recent EU analysis³² highlights how children may be targeted through messaging apps, online games, in-game chats and the glamorisation of criminal lifestyles, violence or drug trafficking. These tactics can exploit children’s need for belonging, recognition, financial security or protection. They may draw them gradually into apparently minor roles, such as acting as lookouts, money mules, couriers or online intermediaries, before escalating to more serious forms of crime.

The Action Plan should recognise online recruitment into crime as a child protection issue, not only a law enforcement or security issue. Children recruited, coerced or manipulated online should be identified first and foremost as children in need of protection, especially where recruitment is linked to poverty, exclusion, migration-related vulnerability, disability, trauma, school disengagement or lack of trusted support networks. Responses should prioritise early identification, safeguarding, multidisciplinary support, rehabilitation and reintegration, while upholding the principle of non-punishment where children have been exploited or forced into criminal activity.

³⁰ Baker, C., Ging, D., & Andreasen, M. B. (2024). *Recommending toxicity: The role of algorithmic recommender functions on YouTube Shorts and TikTok in promoting male supremacist influencers*. DCU Anti-Bullying Centre, Dublin City University.

³¹ Europol. (2024, November 12). *Europol warns of organised crime networks recruiting minors for criminal acts*.

³² European Parliamentary Research Service. (2025, June). *Recruitment of minors into organised crime* (PE 772.903). European Parliament.

7. The Action Plan should strengthen the safeguards for child victims of sexual abuse and exploitation

Protecting children from child sexual abuse and exploitation must be a central priority of the Action Plan. Child sexual abuse and exploitation are not isolated offences, but serious violations of children’s rights, dignity, bodily integrity, privacy, development and access to justice. They occur across online and offline environments and often involve a continuum of harm, including grooming, coercion, sexual extortion, trafficking, production and dissemination of child sexual abuse material, livestreamed abuse, image-based abuse, AI-generated child sexual abuse material and the repeated circulation of abuse material.

Child sexual abuse material remains a major concern. Eurochild members report increases in child sexual abuse and exploitation in several countries, including **Albania, Croatia, Cyprus, Estonia, France, Ireland, Malta, Moldova, Portugal, Romania, Scotland, Spain and Switzerland**.³³ The latest data³⁴ from the Internet Watch Foundation also confirms that EU Member States continue to host a very large proportion of child sexual abuse websites, namely 63% in 2025.

Cases of grooming are also increasing. Eurochild members report cases in **Belgium and Italy** involving children as young as 12, and sometimes younger. In **Romania**, members have observed the normalisation of sexual exploitation in vulnerable communities, increased online recruitment and a rising number of cases involving boys. Children may be groomed through online games and chats, with links to harassment, exposure to harmful content and further exploitation. In **Serbia**, reports have highlighted Telegram groups sharing explicit content, including material involving minors.³⁵

AI-related risks are developing rapidly. IWF data³⁶ shows a sharp increase in AI-generated child sexual abuse material, including severe forms of abuse. Both peers and adults can perpetrate the sharing of intimate images, and this is increasingly facilitated by “nudifying” applications and generative AI. Eurochild welcomes the agreement on prohibiting AI systems that generate or manipulate non-consensual sexual or intimate images resembling real persons. However, further safeguards are needed to ensure that children are protected from the production, dissemination and normalisation of AI-generated sexualised and violent content. It should also push decision makers at all levels to adopt and implement a strong framework to fight child sexual abuse and exploitation, both online and offline.

The Action Plan should support the urgent adoption of a strong, permanent and rights-based EU framework to prevent and combat child sexual abuse and exploitation. This framework should ensure effective prevention, detection, reporting, removal and victim support, while fully respecting fundamental rights, including children’s rights to privacy, protection from violence, access to justice and effective remedies.

³³ Eurochild (2026) [Subreport](#) on children’s rights in the digital environment

³⁴ Internet Watch Foundation. (2026). *Annual data & insights report 2025*.

³⁵ Eurochild (2026) [Subreport](#) on children’s rights in the digital environment

³⁶ Internet Watch Foundation. (2026). *Annual data & insights report 2025*.

Children and survivors, or their parents, should never be left responsible for identifying, searching for or repeatedly reporting material depicting their own abuse. The Action Plan should support trauma-informed pathways for victims and survivors to request assistance with the detection, reporting and removal of such material, including measures to prevent re-uploading.

8. A gender-sensitive and trauma-sensitive approach is essential

The Action Plan should integrate a gender-sensitive approach across all actions, recognising that children of different genders may be targeted, approached, recruited, exploited or harmed in different ways, both online and offline. Gender-sensitive responses should not reinforce stereotypes, but should help identify specific patterns of vulnerability, harm and barriers to disclosure.

Girls and boys may be targeted in different ways and may experience different forms of harm. Girls are disproportionately affected by sexual harassment, sexual abuse, sexual exploitation, image-based abuse and AI-generated sexualised content. According to IWF data, girls³⁷ remain disproportionately represented in child sexual abuse imagery.

At the same time, boys are disproportionately represented in some forms of sexually coerced extortion and may be targeted in gaming environments, violent online communities or recruitment pathways. Boys may also be exposed to misogynistic, extremist or violent content that shapes harmful norms and behaviours.³⁸

Children who do not conform to gender stereotypes, including LGBTQI+ children, may face additional risks of grooming, blackmail, sexual exploitation, bullying, hate crime, or coercion linked to threats of outing or stigma. These risks can be compounded for children in vulnerable situations, including children in poverty, children on the move, children with disabilities, children in alternative care, Roma and racialised children, and children already in contact with justice or child protection systems.

For instance, in **Luxembourg**, there are serious concerns about how institutions respond when children disclose violence, including sexual violence. In some cases, girls who reported rape by a classmate have seen no meaningful progress communicated for several years, with credibility assessments of their testimony only requested after long delays. Victims' associations also report that too many complaints and child protection reports are closed without further action, and that some children are only granted meaningful protection measures after a high number of repeated reports and alerts from different professionals. Such slow and hesitant responses send a harmful message that children's reports may not be believed or acted upon, undermine their trust in protection and justice systems, and increase the risk of secondary victimisation and impunity.

³⁷ Internet Watch Foundation. (2026). *Annual data & insights report 2025*.

³⁸ Baker, C., Ging, D., & Andreasen, M. B. (2024). *Recommending toxicity: The role of algorithmic recommender functions on YouTube Shorts and TikTok in promoting male supremacist influencers*. DCU Anti-Bullying Centre, Dublin City University.

The Action Plan should recognise that children who have experienced abuse, violence, exploitation or coercive control may react strongly to physical contact, restraint, sudden movements, shouting or close proximity by police or other authorities. Where professionals are not trauma-informed, a child's panic, fear, self-protection or defensive reaction may be misinterpreted as aggression or violence. In some cases, this can lead to children who should be treated as victims or children in need of protection being accused of assaulting police officers or resisting authorities. The Action Plan should therefore promote trauma-informed and child and gender sensitive approaches, including de-escalation, avoidance of unnecessary physical contact, clear communication before any intervention, and careful consideration of the child's history and circumstances before any alleged behaviour is criminalised.

The Action Plan should therefore ensure that prevention, reporting, support, data collection and law enforcement responses are gender- and age-sensitive, trauma-informed and adapted to different forms of harm. This should include stronger attention to how criminal actors use gendered tactics to approach, manipulate, recruit or silence children, and ensure that all children can access safe, confidential and child-friendly support without stigma or fear of punishment.

9. Children's right to participation, peaceful assembly and civic space must be protected

Children's participation should not be understood only as consultation by public authorities. It also includes children's right to express their views, organise collectively, associate with others and participate safely in public life, including through peaceful assembly, protest and activism.

Eurochild members³⁹ report worrying restrictions on children's civic space across Europe. In **Spain**, there is no specific regulatory framework supporting children's right to association, with legal gaps affecting children under 14 and restrictions on children under 12 participating in student associations in schools. In **Albania**, children advocating for their rights have reportedly faced pressure or oppression by school staff. In **England**, recent anti-protest legislation and excessive policing have raised concerns for children's right to freedom of assembly, with young people taking part in demonstrations facing intimidation, including in Palestine solidarity and Black-led protests. In **Germany**, young climate activists have also faced repressive measures, including heavy policing and criminalisation.

The Action Plan should therefore recognise that children can come into contact with law enforcement, also as children exercising their fundamental rights. Children and young people must not be criminalised, intimidated, or disproportionately policed for taking part in peaceful assemblies, human rights advocacy, climate activism or anti-racism movements.

The EU should call on Member States to uphold children's rights to participation, association and peaceful assembly, in line with the UN Convention on the Rights of the Child and the EU

³⁹ Eurochild (2025) Sub-report on child participation

Charter of Fundamental Rights. Member States should guarantee safe and enabling civic spaces for children and young people, ensure that policing of assemblies is child-sensitive and proportionate, and review laws or practices that may unduly restrict children's activism or expose them to criminalisation. It should also ensure that children can meaningfully participate and play a role in judicial processes involving them, including through adequate support and information.

10. Education and trusted support systems are key prevention tools

There is a clear link between educational exclusion and childhood criminal exploitation. While children who are outside mainstream education are more vulnerable to becoming victims of childhood criminal exploitation, those who have experienced exploitation will be more vulnerable to educational exclusion.

The Action Plan should support early and continuous education on children's rights, safety, digital literacy, relationships, consent, privacy, manipulation, misinformation, grooming, reporting and help-seeking. This education should start early and continue throughout childhood, adapted to children's evolving capacities.

Schools are essential, but education and support should not be limited to formal school settings. The Action Plan should also support Safer Internet Centres, civil society organisations, youth organisations, helplines, hotlines, community services and child protection actors, especially because some children most at risk may be outside formal education systems or less engaged in school environments.

Digital literacy initiatives should equip children to recognise manipulation, grooming, privacy risks, harmful content and exploitative behaviours online. They should also help children understand their rights and know where to seek support. However, education should never be used as a substitute for platform accountability and systemic regulation. Children should not be made responsible for navigating environments that are unsafe by design.

Awareness-raising should be accessible, age-appropriate, and child-friendly, using channels that children actually use, including social media, television, schools, youth spaces and community services. Campaigns should also target parents, carers and professionals, helping them respond supportively rather than punitively when children disclose harm.

11. Data, monitoring and enforcement must be strengthened

The Action Plan should support improved data collection on violence, exploitation, recruitment and crimes affecting children, including online and offline forms of harm. Data should be disaggregated and combined by age, gender, disability, ethnic or racial origin, where appropriate and in line with human rights safeguards, migration background and other relevant factors. Not only should this data be intersectional and published, but it should also be accessible to the wider public. This is essential to identify patterns, monitor disparities and evaluate the effectiveness of interventions.

The Action Plan should encourage Member States to collect rights-based, disaggregated data on children as victims, witnesses and children alleged as or recognised as having

infringed the law, while fully respecting privacy and data protection safeguards. Any processing of children's data must be necessary, proportionate, rights-based and subject to strong safeguards.

The Action Plan should also strengthen enforcement capacity and coordination across authorities. This includes cooperation between child protection authorities, law enforcement, justice systems, digital services regulators, data protection authorities, equality bodies and EU agencies. The EU should support Member States through training, funding, operational cooperation, guidance, exchange of good practices and stronger implementation of existing EU legislation.

There is also, in **Luxembourg**, a lack of disaggregated data on violence against children and on harmful or criminalised behaviours involving children. This makes it more difficult to identify patterns, monitor institutional responses, assess disparities and develop effective prevention and protection measures.

Key asks

Eurochild recommends that the Action Plan include the following actions:

- 1. Adopt a Plan that focuses on children in contact with the justice system as rights-holders**, including when they are victims, witnesses, alleged offenders or perpetrators. The Action Plan should recognise that children affected by crime are first and foremost children, with rights to protection, support, recovery, participation, rehabilitation and reintegration.
- 2. Recognise access to justice and effective remedies as core components of child protection.** Children should be able to obtain timely, child-sensitive and effective remedies when their rights have been violated. This requires child-friendly and age-appropriate information, legal assistance, advocacy, support for self-advocacy, independent complaints mechanisms, and safe access to courts and non-judicial remedies.
- 3. Prioritise prevention and early intervention by addressing root causes and closing pathways into the child justice system, including through the European Child Guarantee.** The Action Plan should tackle poverty, exclusion, discrimination, family conflict, lack of access to services, migration-related vulnerability, disability-related barriers, institutionalisation and school exclusion. It should also avoid the criminalisation of status-related behaviours and survival strategies linked to poverty, homelessness, family violence, exploitation or exclusion.
- 4. Strengthen integrated child protection systems and multidisciplinary support.** The EU should support Member States in developing clear referral pathways, early identification mechanisms, Barnahus-type models, trauma-informed support, sustainable funding, and cooperation among child protection, education, health, justice, law enforcement, migration authorities, digital regulators, civil society, helplines, and hotlines.

- 5. In line with the Council of Europe Guidelines on child-friendly justice, ensure child-friendly justice systems for all children in contact with justice systems.** This should include age-appropriate procedures, specialised legal representation, the right to be heard, mental health and psychosocial support, which includes dedicated child-friendly facilities, protection from secondary victimisation, non-stigmatising language, and mandatory training for legal, judicial, law-enforcement, probation, and child-protection professionals.
- 6. Protect children from criminalisation when they have been trafficked, exploited, coerced or recruited into crime, both offline and online.** The Action Plan should uphold the principle of non-punishment for children forced into criminal activity and strengthen identification, referral and support for children recruited by criminal networks, traffickers, violent groups or online communities.
- 7. Address discrimination, racial profiling, discriminatory policing and over-criminalisation.** This should include independent oversight, child-accessible complaint mechanisms, equality data, anti-racism and children's rights training, and strong safeguards on the use of AI, facial recognition and other policing technologies.
- 8. Protect children in the digital environment through strong regulation, enforcement and platform accountability.** The Action Plan should support effective enforcement of the DSA, GDPR, AI Act, AVMSD and future Digital Fairness Act, and the adoption of robust EU rules to prevent and combat child sexual abuse and exploitation. It should require safety by design and privacy by default, robust risk assessments, independent audits, researcher access to data, effective reporting and redress mechanisms, safeguards against harmful recommender systems, and stronger detection, reporting and support pathways for online and offline violence against children. EU policymakers should act with urgency and responsibility by adopting, without delay, an ambitious and permanent legal framework to protect children from child sexual abuse and exploitation, both online and offline.
- 9. Protect children's civic space and right to peaceful assembly** by ensuring that children and young people can safely exercise their rights to participation, association, expression and peaceful assembly, including in human rights, anti-racism and climate activism. Member States should prevent the criminalisation, intimidation or disproportionate policing of children engaged in peaceful protest and ensure child-sensitive safeguards in all interactions with law enforcement.
- 10. Ensure child participation, data, funding and coherence across EU initiatives.** Children, including children in vulnerable situations, should be meaningfully involved in the development, implementation and monitoring of the Action Plan. The EU should also improve rights-based and disaggregated data collection, monitoring and evaluation; provide sustainable funding and capacity-building for civil society, child protection services, helplines, hotlines, schools and youth services; and ensure coherence with the EU Strategy on the Rights of the Child, the European Child Guarantee, the Recommendation on integrated child protection systems, the Action Plan on

Cyberbullying, the Victims' Rights Strategy, the Anti-Racism Strategy, the Anti-Trafficking Directive, the CSA Regulation and Directive, and the Digital Services Act.

- 11. Promote diversion, restorative justice, educational measures and alternatives to detention.** Diversion should be the preferred response in the majority of cases and should be voluntary, rights-based, subject to safeguards and review, and should not lead to deprivation of liberty or criminal records. The Action Plan should also require Member States to ensure that deprivation of liberty is used only as a genuine measure of last resort and to invest in the practical availability of restorative, community-based and child protection responses.

- 12. Require Member States to end the placement of children in adult prisons,** ensure full implementation of Directive (EU) 2016/800 and the Council of Europe Recommendation CM/Rec(2008)11, and develop specialised, child-friendly facilities and community-based alternatives that respect the principles of last resort, proportionality and non-punishment of child victims of exploitation

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