

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

Fields marked with * are mandatory.

Introduction

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

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

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

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

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

Risk review

- Risk review

Service Design

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

- Moderation

Reporting, user support and tools for guardians

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

Governance

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

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

Opening: 13 May 2025

Closing: **15 June 2025**, midnight

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

[Article 28 DSA Guidelines - Final Version For Public Consulation - 13.05.2025.pdf](#)

Part 1: About you

* Language of my contribution

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

- ☐ Bulgarian
- ☐ Croatian
- ☐ Czech
- ☐ Danish
- ☐ Dutch
- ☐ English
- ☐ Estonian
- ☐ Finnish
- ☐ French
- ☐ German
- ☒ Greek
- ☐ Hungarian
- ☐ Irish
- ☐ Italian
- ☐ Latvian

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

* I am giving my contribution as

- ☐ Academic/research institution
- ☐ Company/business
- ☐ Business association
- ☐ Consumer organisation
- ☐ EU citizen
- ☐ Non-EU citizen
- ☒ Non-governmental organisation (NGO)
- ☐ Public authority
- ☐ Trade union
- ☐ Other

* First name

Lamprini

* Surname

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Name of organisation

255 character(s) maximum

255 character(s) maximum

Homo Digitalis

* Nationality / country of origin of the organisation

- ☐ AT - Austria
- ☐ BE - Belgium
- ☐ BG - Bulgaria
- ☐ HR - Croatia
- ☐ CY - Cyprus

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

* Is your organisation one of the entities designated as very large online platform (VLOP) or search engine (VLOSE) pursuant to article 33 of Regulation 2022/2065, or representing the interests of one of those entities?

- ☐ Yes
- ☒ No

* Are you an online platform or other intermediary (non-VLOP/VLOSE) with less than 45 million active users in the EU, or representing the interests of one of those entities?

- ☐ Yes
- ☒ No

Transparency register number

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

* Privacy settings for your contribution

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

☐ **Anonymous**

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

☒ **Public**

If you chose this option we would publish your name, the type of respondent that you represent, your country of origin/nationality and the contribution you have submitted.

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

☒ I agree with the [personal data protection provisions](#).

Part 2: General comments

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

CLARITY

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

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

Comments

2000 character(s) maximum

APPROPRIATENESS

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

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

Comments

2000 character(s) maximum

NOVELTY

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

- ☐ Not at all
- ☒ Slightly
- ☐ Moderately
- ☐ Largely
- ☐ Fully
- ☐ I do not know

Comments

2000 character(s) maximum

COMPLETENESS

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

Yes. A robust evaluation framework with clear metrics to assess whether the regulatory objectives envisioned in the proposed guidelines are translated into meaningful protection improvements for young users.

CHALLENGES

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

SUGGESTIONS

What are your suggestions to improve the text?

Please check specific recommendations in the Homo Digitalis position paper (attached) for a number of key section addressed in the proposed guidelines.

Part 3: Comments per section

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

Risk review

RISK REVIEW

- ☒ Yes
- ☐ No

1. APPROPRIATENESS

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

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

Comments

2000 character(s) maximum

2. ADVERSE EFFECTS

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

- ☐ Yes
- ☒ No

Comments

2000 character(s) maximum

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

- ☒ Yes
- ☐ No

Comments

2000 character(s) maximum

3. COMPLETENESS

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

1000 character(s) maximum

Yes. While the section introduces a solid foundation, it lacks a structured taxonomy to assess risks comprehensively. The 5C Typology of Risks must be viewed together with the CENELEC risk-based framework. Together they provide essential granularity and lifecycle guidance for evaluating and mitigating harms to minors. It also omits child developmental factors and offers limited direction on how platforms should assess proportionality across different age groups. Furthermore, the role of children in shaping the review or providing feedback is not addressed, weakening its alignment with UNCRC Article 12 on participation.

4. SUGGESTIONS

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

2000 character(s) maximum

The Risk Review section would benefit from a stronger emphasis on practical implementation and accountability. While the inclusion of the 5C Typology of Risks is welcome, the text should encourage platforms to systematically link each risk category to specific platform features (e.g. recommender systems, chat functions, monetization schemes). This would help operationalize the review and make outcomes more measurable.

We recommend drawing on the CENELEC CWA 18016:2023 framework, which outlines a structured, life cycle based process for managing risks. This could guide platforms to treat risk reviews not as a one-off exercise but as a continuous process tied to platform updates, user behaviour insights, and emerging technologies.

To strengthen alignment with the UNCRC, particularly Articles 3 and 12, the text should also call for the inclusion of children's perspectives in identifying and prioritizing risks—whether through consultations, user feedback mechanisms, or co-design of safer features.

More guidance is also needed on how platforms assess proportionality, particularly in balancing safety measures with rights to expression, participation, and access to information. For example, intrusive safety controls should be discouraged where lower-impact solutions are available.

Additionally, the best interests of the children in the digital environment should be clarified.

Finally, platforms should be encouraged to publish risk review outcomes in a child-friendly and transparent manner, helping build trust and enabling regulatory oversight.

5. ADDITIONAL COMMENTS

2000 character(s) maximum

The Risk Review section can play a central role in operationalising Article 28 of the DSA if reframed as an ongoing, auditable process embedded into platform governance structures. To that end, we recommend mandating periodic reviews (e.g. annually or post-feature deployment), and requiring documentation that is accessible to regulators, civil society, and minors.

We also suggest incorporating risk scoring or prioritisation matrices to help platforms differentiate between low, medium, and high-risk features or interactions. This would allow for more proportionate mitigation and enable better regulatory oversight.

The section should also encourage platforms to link risk reviews with design decisions, by adopting a “safety-by-design” approach that influences everything from default settings to content moderation workflows.

Age assurance

AGE ASSURANCE

- ☒ Yes
☐ No

1. APPROPRIATENESS

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

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

Comments

1000 character(s) maximum

2. ADVERSE EFFECTS

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

- ☒ Yes
☐ No

Please explain which measures and why.

1000 character(s) maximum

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

- ☒ Yes
☐ No

Please explain which measures and why

1000 character(s) maximum

3. COMPLETENESS

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

1000 character(s) maximum

Yes. The section lacks clear technical standards and benchmarks for assessing the effectiveness, privacy, and bias risks of age assurance tools. It does not mandate interoperability, data minimization practices, or on-device processing where possible. While proportionality is emphasised, it lacks a common framework to define risk levels for services, making implementation inconsistent. There is also no reference to fallback mechanisms for children without access to ID or compatible devices, nor to independent audits of age assurance systems.

4. SUGGESTIONS

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

2000 character(s) maximum

The Age Assurance section should go beyond principles and include concrete technical expectations. We recommend introducing minimum performance standards for age assurance tools (e.g. accuracy, false-positive/negative rates), and requiring platforms to adopt privacy-preserving, on-device or zero-knowledge solutions, especially for high-risk services.

Given that not all minors have access to compatible devices or official IDs, platforms should be required to implement inclusive fallback options (e.g. trusted adult verification, device-level controls) to prevent exclusion. We also recommend requiring independent technical audits and impact assessments to evaluate not just accuracy but also fairness and potential for unintended harms (e.g. disproportionate failure rates for minority users).

To support transparency, the text should urge platforms to clearly label when and why age checks are taking place and offer options to challenge or repeat the process in case of error.

Finally, platforms should engage children and young people in the design and usability testing of age assurance methods, ensuring systems are understandable, non-intrusive, and respectful of their rights.

5. ADDITIONAL COMMENTS

2000 character(s) maximum

The Age Assurance section makes important steps toward balancing child protection with privacy. Its emphasis on proportionality is welcomed, but the effectiveness of this approach will depend on its operational clarity. Without clearly defined thresholds, platforms may apply age checks too broadly or inconsistently.

The section should clarify how services should determine whether they fall under “high-risk” or “medium-risk” categories. A Commission-issued risk matrix or scoring tool could help ensure alignment.

Another key concern is the potential for function creep—where age assurance becomes a tool for identity tracking or profiling. The guidelines should reinforce that age assurance data must not be used for commercial, surveillance, or behavioural targeting purposes.

There is also an opportunity to highlight anti-circumvention safeguards, such as liveness detection (for facial tools) or device integrity checks, provided they do not compromise privacy.

Lastly, platforms should be encouraged to publicly report the effectiveness and impact of their age assurance mechanisms, including error rates, complaints, and mitigation strategies. Transparent reporting will strengthen both public trust and regulatory oversight.

Registration

REGISTRATION

- ☒ Yes
☐ No

1. APPROPRIATENESS

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

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

Please explain which measures and why.

1000 character(s) maximum

2. ADVERSE EFFECTS

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

- ☒ Yes
☐ No

Please explain which measures and why.

1000 character(s) maximum

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

- ☐ Yes
☒ No

Please explain which measures and why.

1000 character(s) maximum

3. COMPLETENESS

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

1000 character(s) maximum

Minors have limited attention spans, therefore cognitive load on the registration page matters. Most registration processes are trying to be as quick as possible in order for the user to start using the service. While trying to provide as much safety as possible considering we are dealing with minors, there is a chance that the information overload will frustrate both minors and parents and would discourage future use of the service. However, this can also discourage under-age minors from trying to circumvent the process by trying again. Once minors are approved for the service, introducing safety features during on boarding is more user-friendly. Users are more receptive to safety information when they know they'll be using the platform, rather than while still uncertain about their access. Platforms can use interactive methods instead of long text blocks to share information more engagingly but may also confuse minors.

4. SUGGESTIONS

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

2000 character(s) maximum

1. Develop a targeted on-boarding interactive experience: once registration is complete with methods such as, e.g., tutorials, scenario-based questions ('What would you do if you land into inappropriate content?').
2. Incorporate a 'help button': that would always be visible, in a colour that makes it easily spotted, which can (a) lead to safety resources but also (b) run the tutorial or scenario-based questions again.
3. Avoid long texts due to limited attention span
4. Deploy effective deterrents: When designing measures to deter minors from lying about their age, ensure that such deterrents are effective, e.g. requiring for a parent's e-mail address or phone number to confirm age of minor

5. ADDITIONAL COMMENTS

2000 character(s) maximum

Account settings

ACCOUNT SETTINGS



- Yes
☐ No

1. APPROPRIATENESS

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

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

Please explain which measures and why.

1000 character(s) maximum

2. ADVERSE EFFECTS

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

- ☒ Yes
☐ No

Please explain which measures and why.

1000 character(s) maximum

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

- ☒ Yes
☐ No

Please explain which measures and why.

1000 character(s) maximum

3. COMPLETENESS

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

1000 character(s) maximum

Yes. While the text recognises the need for default settings that enhance privacy and safety, it does not mandate the application of such settings across all services accessible to minors. It also lacks clarity on enforcement and technical implementation, particularly regarding defaults in AI-driven environments like

recommender systems or virtual assistants. The guidelines do not address the role of profiling, nor do they sufficiently consider the accessibility of settings for children with different abilities. There's also no mention of transparent communication to children about what defaults mean or how to change them in a safe and age-appropriate way.

4. SUGGESTIONS

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

2000 character(s) maximum

The guidelines should establish a baseline of mandatory privacy- and safety-enhancing defaults for all services likely to be accessed by minors. These should include turning off location sharing, limiting discoverability, disabling personalized ads, and preventing unsolicited contact by default. For platforms with AI or recommender systems, algorithms should default to non-personalized content unless the child or their guardian opts in through an age-appropriate process.

To ensure accessibility and inclusiveness, platforms should be encouraged to offer simple, guided walkthroughs explaining settings in language children can understand. These walkthroughs should be tested with children across age groups and cognitive abilities.

Settings should also be persistent across devices and sessions, unless intentionally changed by the user, and platforms should make it clear when any settings have been modified.

The section should additionally encourage the use of “privacy nudges”—friendly prompts that help children reflect on choices when attempting to override safer defaults.

We also recommend the inclusion of audit and transparency obligations, requiring providers to publish summaries of how default settings are applied and their impacts on children's safety and privacy. Finally, the text should stress that default settings are not a substitute for comprehensive safeguards, and must be accompanied by other risk mitigation strategies, including user education and moderation practices.

5. ADDITIONAL COMMENTS

2000 character(s) maximum

Default settings are a critical first line of defence in protecting children online, particularly when children often lack the experience to make complex privacy decisions. However, without strong default configurations, platforms risk shifting the burden of safety onto children and caregivers.

We recommend the Commission make a stronger distinction between settings for children under 13 and those for teens, recognizing different developmental needs. Defaults for younger children should be more restrictive, with parental controls activated by default where appropriate.

Platforms should also be required to provide a “reset to safe defaults” function, allowing users to easily restore protective settings after accidental or coerced changes.

Moreover, defaults should be tested for effectiveness in reducing exposure to harm (e.g. contact from unknown adults, access to inappropriate content), and the outcomes shared with regulators.

The section should also address how default settings interact with dark patterns. For example, if safer options are buried behind complex UI flows or misleading labels, the protective intent is undermined.

Ultimately, default settings should not just be protective—they should be respectful of children's rights, accessible, and designed in line with principles of safety by design and evolving capacity.

Online interface design and other tools

ONLINE INTERFACE DESIGN AND OTHER TOOLS

- ☒ Yes
☐ No

1. APPROPRIATENESS

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

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

Please explain which measures and why.

1000 character(s) maximum

2. ADVERSE EFFECTS

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

- ☐ Yes
☒ No

Please explain which measures and why.

1000 character(s) maximum

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

- ☐ Yes
☒ No

Please explain which measures and why.

1000 character(s) maximum

3. COMPLETENESS

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

1000 character(s) maximum

4. SUGGESTIONS

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

2000 character(s) maximum

5. ADDITIONAL COMMENTS

2000 character(s) maximum

Recommender systems and search features

RECOMMENDER SYSTEMS AND SEARCH FEATURES

- ☒ Yes
☐ No

1. APPROPRIATENESS

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

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

Please explain which measures and why.

1000 character(s) maximum

2. ADVERSE EFFECTS

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

- ☒ Yes
☐ No

Please explain which measures and why.

1000 character(s) maximum

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

- ☒ Yes
- ☐ No

Please explain which measures and why.

1000 character(s) maximum

Yes. The draft rightly targets engagement-driven harms and elevates explicit user signals, but leaves key concepts undefined. Terms such as “safety”, “security”, “fairness”, “age-appropriate content” lack measurable benchmarks; measure 535-8's blanket ban on “ongoing behavioural data” could disable essential ranking; there is no technical annex, risk taxonomy or examples repository; transparency only covers § 6.5.2, omitting § 6.5.1; guidance on audits, AI-Act alignment and integration with parental-control /audit-trail duties is absent. These gaps hinder consistent, accountable implementation.

3. COMPLETENESS

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

1000 character(s) maximum

4. SUGGESTIONS

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

2000 character(s) maximum

1. Living Technical Annex – Publish minimum safety baselines, standard metrics (e.g., exposure-diversity index, false-positive rates by protected attribute) and reference tests; require providers to declare and justify their chosen metric set.
2. Independent Oversight – Mandate periodic third-party audits for VLOPs/VLOSEs, with data-access rules that enable meaningful civil-society and academic scrutiny.
3. Refine Data Restrictions – Ban full-funnel attention logging (dwell time, infinite-scroll traces) but explicitly allow (i) ephemeral on-device processing and (ii) differentially-private, aggregated logs, preserving core recommender functionality while protecting minors' privacy.
4. Shared Risk Taxonomy – Adopt an existing child-risk framework (EU Kids Online or OECD four-pillar) as a common reference for risk assessments, metrics and compliance reports.
5. Multilingual Risky-Term Registry – Maintain an EU-hosted, continuously updated list of harmful slang, emojis, hashtags; provide regular synchronised updates to platforms.
6. DSA-AI Act Convergence – Clarify how DSA duties intersect with AI-Act “High-Risk” obligations to prevent duplicative or contradictory safeguards.
7. Age-Appropriate Explanations – Replace text-heavy disclosures with visual cues, gamified interfaces or contextual prompts, drawing on UK Children's Code and UNICEF/JRC cognitive-UX research.

5. ADDITIONAL COMMENTS

2000 character(s) maximum

The guidelines' high-level flexibility is valuable, yet without concrete definitions and implementation artefacts it transfers an excessive interpretative burden to engineering teams and encourages superficial box-ticking. Measure 535-8 exemplifies the risk: a well-intentioned privacy safeguard that, if applied literally, would collapse basic ranking functions. Clear separation between essential operational signals and profiling is crucial. Likewise, minors' right to switch off profiling must be harmonised with parental-control obligations and audit-trail requirements under the DSA to avoid compliance conflicts. Finally, lengthy algorithmic explanations may overwhelm younger users; concise, interactive visuals are likelier to sustain engagement and understanding.

Commercial practices

COMMERCIAL PRACTICES

- ☒ Yes
☐ No

1. APPROPRIATENESS

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

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

Please explain which measures and why.

1000 character(s) maximum

2. ADVERSE EFFECTS

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

- ☐ Yes
☒ No

Please explain which measures and why.

1000 character(s) maximum

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

- ☐ Yes
☒ No

Please explain which measures and why.

1000 character(s) maximum

3. COMPLETENESS

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

1000 character(s) maximum

The notion of banning direct exhortations to children within the meaning of No 28 Annex I of the UCPD is not addressed in this section. This ban includes putting pressure on children to buy a product directly or to persuade adults to buy items for them (the 'pester power'). Also, since children maturity varies depending on age, further clarifications on how to assess the maturity and perception of the average member of a group of minors would offer an added value to the present guidance.

4. SUGGESTIONS

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

2000 character(s) maximum

1. Include references to the EDPB guidelines on dark patterns: Providers should also take into account the clarifications on commercial practices from the Commission Notice EU Commission Notice (2021/C 526/01) which offers Guidance on the interpretation and application of the UCPD (Directive concerning unfair business-to-consumer commercial practices directive), including on "dark patterns".
2. On ensuring economic transactions in an age-appropriate way and avoid the use of intermediate virtual currencies: clarifications on the alternative means of payment (e.g. use of credit cards under parental supervision) are needed in order to facilitate developers in offering alternative means for economic transactions that are appropriate for minors.
3. Page 25, on the exposure of minors to purchases deemed necessary for the use of the service and on features appearing on being free: 1) The use of firewalls when assessing online platforms not discussed in this section. Firewall products embedded in online platforms should include parental control features that allow parents to customize content; 2) The recommendation is very vague and fail to address specificities or to provide clear benchmarks for providers on the level of information or clarifications to provide to minors when accessing online platforms in order to enable them to make an informed decision.

5. ADDITIONAL COMMENTS

2000 character(s) maximum

It is not clear whether platform moderators will be under the obligation to carry out an impact assessment in order to assess the likelihood of causing harm to minors, the impact to them and the number of minors likely to be impacted. Platforms should be obliged to report to the privacy team the results of this impact assessment and staff carrying out these assessment should be properly trained and aware of the level of scrutiny required for assessing the likelihood of harm to minors, as well as the mitigating measures to be taken and a proper follow-up of putting them into practice.

The security risk assessment should be part of the process and further guidance may be sought from the EDPB Guidelines on data protection impact assessments (WP2481). Those guidelines contain a methodology for assessing whether processing is likely to result in high risk. Privacy teams should be able to oversee the drafting of impact assessments.

MODERATION

- ☒ Yes
☐ No

1. APPROPRIATENESS

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

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

Please explain which measures and why.

1000 character(s) maximum

2. ADVERSE EFFECTS

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

- ☒ Yes
☐ No

Please explain which measures and why.

1000 character(s) maximum

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

- ☐ Yes
☒ No

Please explain which measures and why.

1000 character(s) maximum

3. COMPLETENESS

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

1000 character(s) maximum

Defining harmful content can sometimes become tricky, especially when the service provider and large platform does not operate in Europe which shares the same liberal values. A platform designer outside the EU may consider content which may seem inappropriate to European users as appropriate in the country of origin. Also, marginalised societal groups (LGBTQ+ community) may have different perceptions of what constitutes inappropriate content, while religious groups and societies may have the opposite view. Often, definition of such terms can be subjective. Sometimes algorithms or other automated detection tools can make mistakes which may lead to under or over blocking. Such mistakes can be made due to several non-detected faults, such as: supposedly friendly content based on keywords or phrases, the covert meaning of which can only be detected by a human brain, disguised hate or sexist speech.

4. SUGGESTIONS

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

2000 character(s) maximum

1. Clarify on harmful behaviour: Considering a clear and finite definition of harmful content may not always be achieved due to conflict of interests or the bridging of cultural gaps, platform providers need to be absolutely clear on what constitutes harmful behaviour as they may, otherwise, run the risk of an algorithm making an ultimate decision as to whether to display specific content, which may lead to further issues.
2. Coordinate with civil society organisations: Share the policies and procedures with civil society groups in order to show how a platform moderates its content in order to gather feedback from other specialists or independent experts.
3. Provide adult-appropriate training: developers need to familiarise themselves with modern causes of harm and trauma to minors (by sourcing data from civil society or therapists) in order to be made aware and classify certain behaviour and content accordingly.
4. Clarify content that 'substantially extends' average number of views: It could be useful to set a number of criteria that will indicate when content is considered viral reaching to a wider audience in order to ensure that specific resources are efficiently allocated to human review. In cases where human review may take time or the reviewer is unsure of the determination, it may be useful to (a) establish a second review stage where content could be escalated for scrutiny by experts, moderators with child rights advocates experience and (b) decide to blur any content which has not yet been classified as harmful.
5. Conduct regular audits: may be needed to test such AI systems and tools in order to ensure their effectiveness in moderation, reviewed based on novel technological criteria for AI moderation tools.

5. ADDITIONAL COMMENTS

2000 character(s) maximum

User reporting, feedback and complaints

USER REPORTING, FEEDBACK AND COMPLAINTS

- ☒ Yes
☐ No

1. APPROPRIATENESS

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

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

Please explain which measures and why.

1000 character(s) maximum

2. ADVERSE EFFECTS

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

- ☒ Yes
- ☐ No

Please explain which measures and why.

1000 character(s) maximum

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

- ☐ Yes
- ☒ No

Please explain which measures and why.

1000 character(s) maximum

3. COMPLETENESS

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

1000 character(s) maximum

Since the reporting, feedback and complaint tools are aimed to serve the interests of children, it is of utmost importance that these tools are children-friendly and accessible. Allowing minors to report content (e.g. accounts, groups, pages) as inappropriate is a powerful tool which can, however, be used both in a productive but also in an arbitrary way. Also, allowing reporting go suspected under age accounts may have the intention to protect minors, however it may also lead to targeted actions of certain minors against others. Providing clear and distinct (from the content) reporting and feedback tools, such as 'I do not like this' provides great empowerment and control to minors. More specifically, using emotional language such as

'this makes me feel...' may engage minors to report more accurately and provide with a safe space to communicate their feelings. Lodging official complaints is also a great way to empower them.

4. SUGGESTIONS

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

2000 character(s) maximum

1. Developing too complex and detailed report features will only deter children from providing their feedback. Measures to be taken to ensure that such tools are accessible to children, is providing them with visuals throughout the reporting and understandable language. Accessible feedback, reporting and complaint tools should also take into account minors with disabilities.
2. In order to prevent arbitrary reporting or revenge reporting, minors should be provided with definitions or examples of harmful content or behaviours that are as clear as possible for a minor to understand. Reporting of suspected under age accounts can be restricted to a certain number of reports per day/week /month, in order to deter any false harassment.
3. Any distinct reporting and feedback tools should be very clear to understand, should not cause ambiguities to minors or confusing them into what and how to report. Adding visual images or emojis on any reporting mechanism may ease the process of reporting as well as make it direct and efficient.
4. Official complaints procedures should include tracking of the complaint process, results as well as being provided with a follow up for taking a certain decision (blocking content or user) as well as rationale for not doing so. Minors need to know that their voices are heard and that complaints are not just a bureaucratic practice.

5. ADDITIONAL COMMENTS

2000 character(s) maximum

User support measures

USER SUPPORT MEASURES

- ☒ Yes
- ☐ No

1. APPROPRIATENESS

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

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

Please explain which measures and why.

1000 character(s) maximum

2. ADVERSE EFFECTS

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

- ☒ Yes
☐ No

Please explain which measures and why.

1000 character(s) maximum

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

- ☒ Yes
☐ No

Please explain which measures and why.

1000 character(s) maximum

3. COMPLETENESS

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

1000 character(s) maximum

Yes. The section omits the need for proactive support features, such as in-app digital literacy education or guidance that builds children's resilience before harm occurs. It also lacks requirements for trauma-informed support design, essential for children disclosing abuse or distress. While reporting tools are mentioned, there's no reference to ensuring confidentiality, especially in cases where notifying others could put the child at further risk. The section also doesn't account for follow-up protocols when serious harm is reported, nor does it include mechanisms for user feedback and continuous improvement of support systems.

4. SUGGESTIONS

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

2000 character(s) maximum

1. We suggest expanding the section to promote proactive educational tools—such as in-app prompts, scenario-based learning, or pre-incident guidance—designed to help children recognize risks and seek help before harm occurs. These tools should be age-appropriate and integrated seamlessly into the user experience.
2. Support tools should be trauma-informed, avoiding judgmental language and minimizing the need for children to relive distressing events in detail. The design must account for emotional safety, especially for survivors of abuse or coercion.
3. Platforms should also ensure confidentiality when children use reporting tools. For example, no notifications should be sent to other users or family members unless explicitly authorized by the child and consistent with their best interests.

4. To address serious risks, the guidelines should encourage platforms to adopt protocols for escalation to child protection authorities in line with national laws and safeguarding principles.
5. Moreover, we recommend including a “trusted adult” or “designated guardian” feature, allowing children to link their accounts to verified support contacts (e.g. parents, teachers, school counsellors).
6. Finally, platforms should collect feedback from child users about their experience with support tools, use that input to improve effectiveness, and publish transparent reports on performance indicators such as time to resolution, outcomes, and satisfaction.

5. ADDITIONAL COMMENTS

2000 character(s) maximum

While the guidelines correctly identify the importance of accessible, child-friendly support tools, the approach is largely reactive. A more balanced strategy should include preventive and resilience-building measures, supporting children before, during, and after any exposure to online harm.

Support tools should be multi-lingual, accessible to children with disabilities, and usable across devices, including low-end smartphones. The section should also recognize that support needs may differ by age group, and younger users may require simplified reporting flows or visual aids.

To build trust, platforms should ensure that children receive timely, empathetic responses when they reach out for help. Support systems should be staffed or reviewed by professionals trained in child safeguarding and digital well-being.

Platforms must also guard against under-reporting due to fear or mistrust. This means emphasizing confidentiality, ensuring children are not penalized for seeking help, and clearly communicating the limits of platform responses.

Finally, to support long-term improvement, the Commission could encourage the development of best practice benchmarks for child support in digital services and consider the creation of certification schemes for child-safe reporting and support systems.

Tools for guardians

TOOLS FOR GUARDIANS

- ☒ Yes
- ☐ No

1. APPROPRIATENESS

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

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

Please explain which measures and why.

1000 character(s) maximum

2. ADVERSE EFFECTS

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

- ☐ Yes
☒ No

Please explain which measures and why.

1000 character(s) maximum

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

- ☒ Yes
☐ No

Please explain which measures and why.

1000 character(s) maximum

3. COMPLETENESS

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

1000 character(s) maximum

4. SUGGESTIONS

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

2000 character(s) maximum

5. ADDITIONAL COMMENTS

2000 character(s) maximum

Governance (general)

GOVERNANCE (GENERAL)

- ☒ Yes
☐ No

1. APPROPRIATENESS

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

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

Please explain which measures and why.

1000 character(s) maximum

2. ADVERSE EFFECTS

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

- ☐ Yes
- ☒ No

Please explain which measures and why.

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

- ☒ Yes
- ☐ No

Please explain which measures and why.

1000 character(s) maximum

3. COMPLETENESS

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

1000 character(s) maximum

Yes. The section lacks clear minimum qualifications for child safety officers or governance teams, including required expertise in child rights and digital harms. It also does not require independence or direct reporting lines to senior management, which could weaken accountability. There's limited guidance on how to operationalize child participation or ensure that feedback from minors informs governance decisions. Additionally, there is no mention of public transparency, such as publishing outcomes or metrics related to governance performance, nor is there a mechanism to assess effectiveness over time.

4. SUGGESTIONS

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

2000 character(s) maximum

1. We suggest strengthening the section by making key governance elements mandatory—such as the appointment of a dedicated, qualified person or team responsible for minors' safety, privacy, and wellbeing.
2. This team should possess relevant expertise in safeguarding, data protection, and child rights, and report directly to senior leadership to ensure influence and accountability.
3. The guidelines should promote meaningful child participation, not just feedback collection. Platforms should engage children through co-design processes, youth advisory panels, or moderated consultations, and establish clear mechanisms to show how input has shaped decisions.
4. We also recommend including transparency obligations, such as publishing annual governance summaries that report on risks identified, steps taken, and outcomes achieved. These reports should be accessible to children, parents, regulators, and civil society.
5. Additionally, platforms should adopt whistleblowing and escalation mechanisms for employees to report failures in child safety governance without fear of retaliation.
6. To support improvement, platforms should undergo periodic reviews or independent audits of their governance structures and outcomes. Finally, cross-platform collaboration should be encouraged to develop sector-wide standards and good practices, particularly among Very Large Online Platforms (VLOPs) and Services (VLOSEs).

5. ADDITIONAL COMMENTS

2000 character(s) maximum

Governance is the foundation for sustained child protection, but to be effective it must go beyond principles and be embedded into the platform's organizational culture and decision-making structures. The section would benefit from stronger alignment with the DSA's systemic risk framework and with Articles 3 and 12 of the UNCRC, reinforcing the child's best interests and right to be heard.

We recommend a clearer call for cross-functional integration, ensuring that product, legal, policy, and engineering teams work collaboratively under child safety governance structures. This would help ensure that safety-by-design is implemented at every stage of product development.

The Commission should also promote the development of shared governance benchmarks, offering platforms a structured way to assess their maturity and progress in protecting minors.

Where appropriate, regulators could encourage the use of certified governance frameworks, particularly for high-risk services, to promote accountability and comparability.

Lastly, the section could acknowledge the importance of external stakeholder engagement—including civil society, academics, educators, and child advocacy groups—in shaping effective governance models and keeping platforms aligned with evolving risks and rights-based standards.

Terms and conditions

TERMS AND CONDITIONS

- ☐ Yes
- ☐ No

Monitoring and evaluation

MONITORING AND EVALUATION

- ☐ Yes
- ☐ No

Transparency

TRANSPARENCY

- ☐ Yes
- ☐ No

Additional contribution

Please upload any file you wish to share here (one document).

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