



# New European Strategy for Better Internet for Children

*EuroHealthNet's input to the European Commission's feedback, October 2021*

EuroHealthNet - not-for-profit European partnership for health, equity, and wellbeing - welcomes the roadmap on a **New European Strategy for a Better Internet for Children**, and its aim to strengthen the protection and empowerment of children online in the EU. Along with accelerated digital transformation in the past years and because of the COVID-19 pandemic, children's use of new digital technologies has increased, and so have the associated challenges and opportunities. An update of the Strategy is welcome as it offers opportunities to take both on the advantages as the challenges to help children thrive and protect their rights, including their right to health and psychosocial wellbeing in digital environments.

Through focused input on key elements of the updated Strategy, EuroHealthNet calls for a renewed approach to how children and adolescents' rights to healthy, commercial, and digital interest-free childhoods should be taken forward, and that it is within the EU and national governments' remit to act.

The limited space available for this feedback does not allow to touch upon all relevant issues for the development of a long-term strategy. We therefore focus our input on key elements:

- 1. Ensure equity, co-creation with children and attend to disadvantage with intensity according to the need ('proportionate universalism principle'):** The lack of an adapted digital environment for children can lead to poorer educational outcomes, psychosocial problems, and other outcomes along the life-course. Beyond focusing on the disadvantaged groups of children and adolescents who clearly need support in this regard, we argue for a comprehensive and universal framework able and agile enough to protect all children in the EU digital space. This approach would help the implementation of a number of other EU initiatives such as the European Pillar of Social Rights' Action Plan, the EU Child Rights Strategy, the Digital Education Action Plan, or the EU Child Guarantee, to name but a few.
- 2. Respect children's rights in a world fit for the digital age:** EuroHealthNet welcomes the rights-based approach to access to digital technologies for children that this Roadmap has taken. The online and digital space offers children new opportunities to express themselves, to connect with their friends, to access information, to learn, to play, and to create. However, cyberbullying, harmful content, online grooming and pornography, abuse and (sexual) harassment are among the most severe dangers found in the digital world. Hate speech and disinformation are prevalent on the social media. Aggressive online advertising and marketing of health-harmful products, such as traditional and novel tobacco products, alcohol, foods high in fats, salt and sugars (HFSS) targeting children as vulnerable consumers are adding to increasingly digitally and commercially-determined risk behaviours. At the same time children's right to privacy is often violated as children's personal data are being collected,

leaked, and misused. Artificial intelligence is already part of children's lives and poses threats that need regulation and better guidelines.<sup>1</sup> To this end:

- The European Commission and EU Member States should guarantee that in existing and upcoming legislation and policies related to digitalisation and interoperability initiatives (eg. health, food and nutrition) the rights of children are protected, their privacy and data are safeguarded and used in a transparent way in full respect of the best interest of the child;
  - EU Member States must hold companies and commercial operators accountable and ensure that their services use data in an ethical and transparent manner. EU Member States should explore the possibility of appointing national data protections officers with expertise in child rights;
- 3. Promote digital (health) literacy:** Investing in building up and maintaining digital (health) literacy education in early years would support all the children to enter and navigate the online world on the same footing. By providing them with skills, knowledge, competence and confidence needed they can be empowered and equipped to make the 'right' decisions, healthier and sustainable choices including. However, it should be clear that the final responsibility should never be put on the individuals – children or even their guardians only. Digital health literacy programmes should foster a secure use of internet and associated digital tools and services from a systems-wide perspective. Children should be informed of the risks related to the use of internet, how to minimise and face threats, misinformation or fake news. On the other hand, providing children with the right digital skills would facilitate their access and efficient use of valuable tools, such as those implemented for remote or blended learning. It would also provide children with those digital skills that will eventually be needed to facilitate their transition to the future world of work. To this end:
- The European Commission and EU Member States should support children's skills and competences in technology and media. They should develop easy to read/child centred material on tackling disinformation online, raising awareness about hate speech, bullying and harassment and they should allocate EU funding in capacity building of teachers and of parents in order to be able to support and empower children recognising their digital rights and needs;
  - The European Commission should put children's participation and empowerment at the heart of the Updated Skills Agenda for Europe and of the European Education Area and should support digital skills and literacy through external action. The EU and its Member States should invest EU and national resources in programs aimed to develop quality digital education solutions for every child, and particularly for the most disadvantaged, creating innovative solutions for children with relevant skills for the twenty-first century economy;
- 4. Reinforce and institutionalise protection against commercial determinants of health in childhood:** Where education cannot reach, literacy programmes need to synergies with other relevant legal frameworks and EU policies. The New European Strategy for a Better Internet for Children should foresee concrete actions and regulation to protect children from cyberthreats. Regulatory measures should be explored for marketing restrictions of particularly products such as tobacco, alcohol, and unhealthy food. Policies tend to have a narrow focus toward more traditional media, mainly television, neglecting children's exposure

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<sup>1</sup> Joint position paper the EU Child Rights Strategy (2020).

<https://eurohealthnet.eu/sites/eurohealthnet.eu/files/publications/Joint%20Position%20Paper%20in%20the%20Upcoming%20Childs%20Rights%20Strategy.pdf>



to targeted advertising and marketing through online peer-pressure venues, such as ad-games, TikTok or Youtube<sup>2</sup>. Hence, policies can effectively protect children only as long as they adopt a holistic approach that covers all the media. To this end:

- The European Commission should create guidelines for digital services including digital media and AI (in line with Council of Europe Guidelines and UNCRC General Comment) that may be used by children. Guidelines should apply to both services provided by EU Member States and companies. These guidelines should be part of the EU Digital Services Act;
- 5. Define policies based on the level of maturity and reflective of the socio-economic backgrounds:** Policies should not be limited to a fixed age, but address children of all ages. Usually, policies target children until they are 12 or 13 years old. However, a growing body of evidence shows that susceptibility to external influences and ability to distinguish and act on the assessments are very subjective and fluctuate not only with age and the level of maturity, but also along the social gradient.<sup>3</sup> Therefore, even though adolescents are more developed cognitively than younger children, their social, developmental, hormonal and neurological characteristics render them particularly susceptible to digital influences.<sup>4</sup>

EuroHealthNet is a not-for-profit partnership of organisations, agencies and statutory bodies working on public health, disease prevention, promoting health, and reducing inequalities.

Useful publications:

[Digital health literacy: how new skills can help improve health, equity and sustainability](#)

[Making the link: health, education, and inequality](#)

[Joint Position Paper on a Comprehensive Child Rights Strategy](#)

[EuroHealthNet responds to eh EU consultation on the European Health Data Space](#)

[EuroHealthNet consultation response on the Digital Targets 2030](#)

[EuroHealthNet contribution to the EU Strategy on the Rights of the Child \(2021-2024\)](#)

[EuroHealthNet provides feedback to the EC on the Child Guarantee](#)

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<sup>2</sup> WHO (2018), “Evaluating Implementation of the WHO set of Recommendations on the marketing of foods and Non-Alcoholic beverages to children. Progress, challenges and guidance for next steps in the WHO European Region”, *WHO Regional Office for Europe*.

<sup>3</sup> Harris JL, Schwartz MB, Brownell KD, (2010) “Marketing foods to children and adolescents: licensed characters and other promotions on packaged foods in the supermarket”, *Public Health Nutr.*, 13(3), 409–17

<sup>4</sup> Fitzgerald A, Heary C, Nixon E, Kelly C, Shevlin M (2013), “Self-efficacy for healthy eating and peer support for unhealthy eating are associated with adolescents’ food intake patterns”, *Appetite*, 63, 48–58.