EU Children's Participation Platform

Findings from the consultation with children on The Digital Fairness Act (DFA)

10 July 2026

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A report submitted by ICF S.A.
in association with

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Executive summary

This report shares what children and teenagers said about making the digital world fairer, including apps, websites, games, online shops and social media. The consultation was part of the EU Children's Participation Platform and focused on matters at the core of the upcoming Digital Fairness Act. It has also asked questions related to possible rules for joining social media.

In total, **4,786 children aged 12 to 17** from all EU Member States and EU citizens living abroad took part in the survey. The largest share of children was from **Germany (38%, 1,810 children)** and **Romania (33%, 1,602 children).** The results should not be treated as the views of all children in Europe. However, they give useful evidence about what many children think and want.

Overall, **children want the online world to be safer, fairer and easier to understand**. They do not want every online feature to be banned, and many want children, parents and carers to have choices. However, **children were clear that stronger rules are needed where online services may be unfair, or designed to make children spend time and money online**.

Key findings

Attention maximising features

- **Children had mixed views about attention maximising features that keep them online for longer.** Across the different features asked about, the largest share of children (ranging from 24% to 38% across the listed options) said they "did not really mind" these features, However, between 26% and 37% children said they did not like these features, while a smaller share (between 18% and 32%) said they liked them. Endless scrolling and notifications were the features that children disliked most.
- **Children wanted some controls over attention maximising features.** Nearly half of children (48%) asked for **some** kind of rule or control. 23% indicated that some of these features should not be allowed. 20% suggested these features should be turned off by default (with the possibility to switch them on with parental approval). 28% wanted the features to remain. 5% were in favour of banning all the attention maximising features altogether.

Spending maximising features

- **Most children wanted rules for loot boxes in games (**80%) Around one third (32%) thought loot boxes should be **banned** for children. A further 28% children wanted the **chances of winning each item to be clearly shown**. 19% children wanted loot boxes turned off by default (with the possibility to switch them on subject to parental approval). 11% thought that there should be no rules.
- **Children also wanted rules for pay-to-win and pay-to-progress features** (64%). 29% wanted to have these features off by default (with the possibility of turning them on subject to parental approval). 23% of children wanted a complete ban. 20% wanted them to remain.

Unfair personalisation

- **Children had mixed views about personalised adverts.** 37% said they did not like personalised adverts, while 29% said they did not really mind them. 21% children, said they liked personalised ads.
- **70% of the responding children opposed different prices for the same things for different people** while 10% indicated that they do not really mind it and 6% like it.

- **58% of the responding children wanted stronger controls over personalised ads and pricing.** 20% said that these features should be turned off by default for children with the possibility to turn them on with parental approval. 20% suggested that they should be banned for children. 18% wanted them to remain.

Unfair influencer marketing

- **Most children wanted tighter rules for influencers.** 69% said influencers should only be allowed to promote products that are safe and appropriate for children and teenagers.
- **Children clearly identified products that should not be promoted to children.** Among those answering this question, 88% said alcohol, cigarettes and vaping products should not be promoted to children. 86% said gambling and betting apps should not be promoted. 82% opposed promotion of cosmetic surgery or cosmetic treatments, and 82% opposed promotion of diet pills and supplements.

Joining social media

- **Most children (78%) suggested an age, ranging from 12 to 18, for joining social media.** Younger children were more likely to think children should be able to join social media at a younger age, while older children were in favour of higher age threshold before joining social media.

Age checks

- **Most children supported age checks for checking certain things online.** 72% supported some form of age check, including 42% of children that said age checks were a good idea and 30% of children said age checks should only happen sometimes.
- Children highlight specific apps and websites that should be subject to age checks:
  - Online traders, social media and messaging apps
  - Adult-only and general age restricted services
  - Gambling
  - Pornography, sexual, explicit content
  - Gaming platforms
  - Shopping, purchases, payments or commercial sites
  - Dating, meeting stranger, or adult contact

Children's suggestions and recommendations

Children shared their own ideas on what the EU could do to make the online world fairer and safer for children and teenagers.

- Teach children more about online safety.
- Help parents and carers understand the online world.
- Use age limits and age checks carefully.
- Limit accessing harmful or adult content for children.
- Make online environment and digital products safe-by-design and safe-by-default.
- Give children more control and transparency over algorithms and recommender systems.
- Improve reporting, moderation and enforcement.
- Protect children's privacy and data, while avoiding turning safety into surveillance.
- Create safer dedicated and age-segmented online spaces and tools for children and teenagers.
- Support children's mental health and offline life.

1 Introduction

This report presents findings from the fifth consultation with children conducted for the EU Children's Participation Platform. It has the following structure:

- Section 2, 3, 4, 5 and 6 report on the consultation findings;
- Section 7 reports on the collated key recommendations from children;
- Annex 1 presents the consultation methodology, the characteristics of children participating in the consultation activities, and children's feedback.

1.1 Consultation theme, policy context, and aims and objectives

This fifth consultation[1] of the EU Children's Participation Platforms focused on **digital fairness in the online environment** concerning all online traders including platforms, apps, websites, games and social media.

Children taking part in the EU Children's Participation Platform activities in 2023 and 2024 had asked that the Platform focuses on **the digital environment**. This topic was linked to the European Commission's public consultation contributing to an upcoming law called the **Digital Fairness Act**.

The results of this child consultation provide valuable insights from children's perspectives about how to make the internet a fairer place for everyone, including young people. The results also help the EU better understand what changes and actions are needed at the EU level to make better rules to protect children and teenagers online.

1.2 Consultation methodology

The online consultation was conducted between 26 March and 26 April 2026. In total, 4,786 children[2] from EU Member States and EU citizens living abroad participated in the online survey consultation.

This report should be regarded as a summary of the contributions made by children and teenagers to the consultation on the upcoming Digital Fairness Act. Responses to the consultation activities cannot be considered as a representative sample of the views of children and teenagers in the EU and EU citizens living abroad.

Characteristics of survey respondents are presented in Annex 1. In brief:

- **Age:** survey respondents were aged 12 to 17, with the largest shares aged 16 (23%, 1,122), 17 (22%, 1,065) and 15 (19%, 920), the smallest proportion of respondents were aged 12 (8%, 380)
- **Gender:** 54% girls (2,604) and 42% boys (1,993), with smaller proportions selecting "I don't want to say" (3%, 127) or "other" (1%, 62).
- **Country:** all EU member states were represented. The largest number of participants were from Germany (38%, N=1,810) and Romania (33%, N=1,602),

[1] The previous four consultations can be found here: https://eu-for-children.europa.eu/childrens-voices_en

[2] In total, the survey received 4,989 responses from children. However, 203 responses marked as potentially at risk of being compromised (e.g. hacking or automated/bot responses as indicated by the reCAPTCHA survey tool) were excluded from the analysis.

together accounting for 71% of all consulted children. The remaining responses were split across the Member States, with low responses in individual countries.

In the survey analysis, subgroup differences are reported where they are notable and help interpret findings, rather than for every survey question.

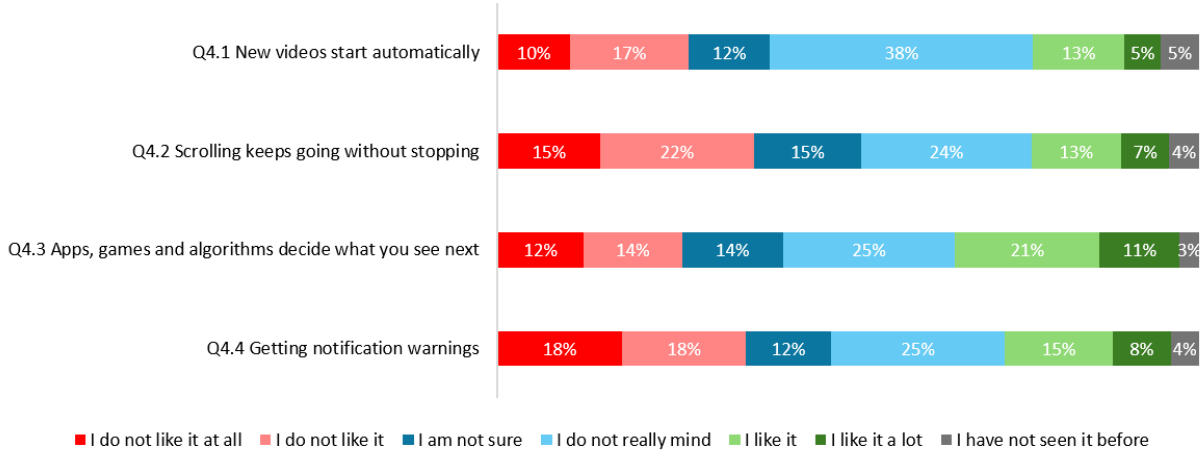
2 Attention maximising features

2.1 Children's views vary across different features

When asked about attention-maximising features, across all options[3], the largest share of children "did not really mind" the listed features (24-38%) (see Figure 2.1). Children not liking these features were the second largest group (26-37%)[4], whereas the share of children liking these features was smaller (18-32%). Only a small proportion of children (3-5%) have not seen these features before.

Children were most negative about the "scrolling keeps going without stopping" and "getting notification warnings" features, with 37% (N=1,691)[5] and 36% (N=1,648), respectively reporting a negative response, and most positive about "apps, games and algorithms decide what you see next" feature with 32% (N=1,484) reporting a positive response.

Figure 2.1 Children reported a range of opinions on online features (N=4,663)



Note: Q4: 'What do you think about the below features?' Single choice question. Some small edits have been made to the percentages in the figure to ensure this rounds to 100%.

Children expressed indifference towards the autoplay feature. When asked about the feature "new videos start automatically" the most common response was "I do not really mind" (38%, N=1,743). However, the remaining children who had seen this feature and had an opinion were more negative about it (27%, N=1,265) than positive (18%, N=847). There were no clear differences between genders, ages or Member States[6] for this feature.

[3] The full text of Q4 was as follows: *'Have you ever watched a video and the next one starts automatically? Or kept scrolling because new posts were showing up? Sometimes apps and websites also choose what you see next. Or you might get notifications telling you to come back so you don't lose points, rewards, or progress in a game. These features can make it harder to stop and may keep you online longer than you planned. What do you think about the below features?*' Single choice question for each option listed.

[4] Across all survey analysis sections, a cumulative percentage and number of responses is provided when reporting together on 'I do not like it at all' and 'I do not like it' responses, and on 'I like it' and 'I like it a lot' responses.

[5] "N" refers to the 'statistical base' or number of children who answered the question. Alternative "n" refers to a subset who answered a particular way or possess a particular characteristic.

[6] Please note that in-depth analysis of surveyed children by their characteristics is only reported for variables with at least 100 responses and where characteristic results differ from the overall result by more than 10%. This is a pragmatic threshold to highlight differences that might be meaningful in practice, even if they cannot be statistically validated.

Children felt most negative towards infinite scrolling. Children were most negative about the "scrolling keeps going without stopping" feature out of all the features presented with 37% (N=1,691) reporting a negative response. Older children (45%, N=465) were more likely to feel negative towards infinite scrolling compared to younger children (31%, N=117). Younger children were also more likely to report not having seen this feature before (11%, N=39) compared with older children (3%, N=28). There were no clear differences between Member States for this feature.

Children felt negative towards notifications. Children felt mostly negative about "getting notification warnings" (36%, N=1648). Older children (41%, N=425) were more likely to report a negative response compared with younger children (28%, N=103). There was no clear difference between genders or Member States.

> *"Autoscrolling and autoplaying induces laziness within children and this should be minimized if possible" [Boy, 16, Ireland]*[7]

> *In my opinion, infinite scroll, autoplay, and notifications should not be allowed for people under 16, because they reduce self-control and encourage excessive use [Girl, 17, Cyprus]*

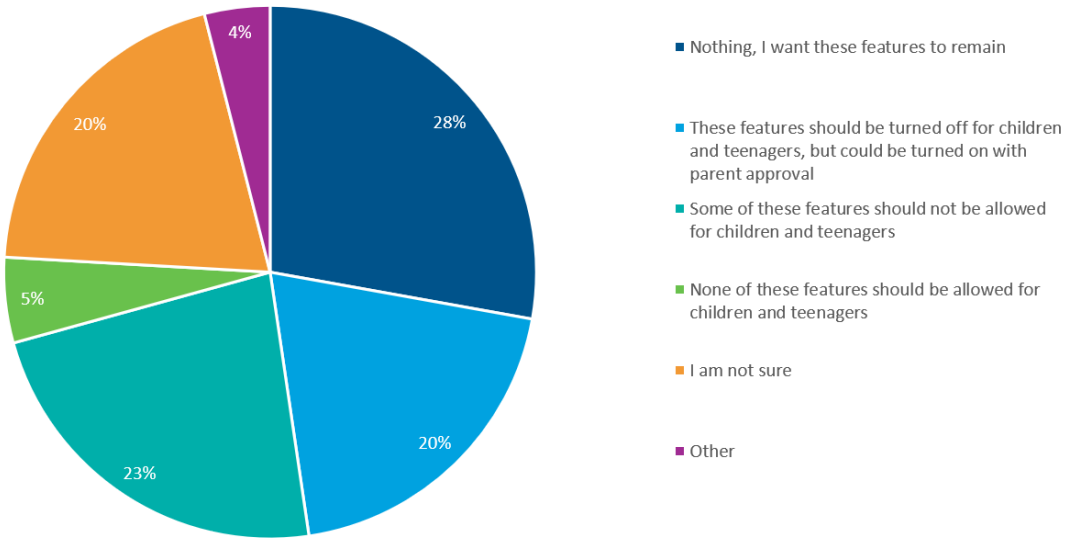
Children felt the most positive towards apps, games and algorithms deciding what you see next (32% (N=1,484) reporting a positive response). Another 25% said they didn't mind this feature, while 26% felt negative about it. There were no clear differences between genders, Member States or age for this feature.

2.2 Children favour some kind of control over attention maximising features

Nearly half of children (48%, N=2,294) favoured some kind of control over attention-maximising features (see Figure 2.2). Generally, only a small proportion of children was in favour of banning the features altogether (5%, N=247). However, nearly a quarter of surveyed children indicated that some of these features should not be allowed (23%, N=1,100) and another fifth of children (20%, N=947) suggested these features should be turned off for children and teenagers but could be turned on with parental approval. Over a quarter of surveyed children (28%, N=1,327) wanted the features to remain and another fifth of children were not sure about their opinion (20%, N=960).

[7] This and next quotation were provided to Q5a: 'Which features should not be allowed for children or teenagers?'. Open-text question.

Figure 2.2 Children split in their opinion regarding online feature controls (N=4,743)



Note: Q5: 'What should apps, games, social media and websites do about these online features for children and teenagers?' Single choice question. Some small edits have been made to the percentages in the figure to ensure this rounds to 100%.

Older children (27%, N=287) were more likely to report that only some of the features should be allowed compared with younger children (19%, N=71). Boys were far more likely to report that the features should remain (35%, N=689) compared to girls (22%, N=572).

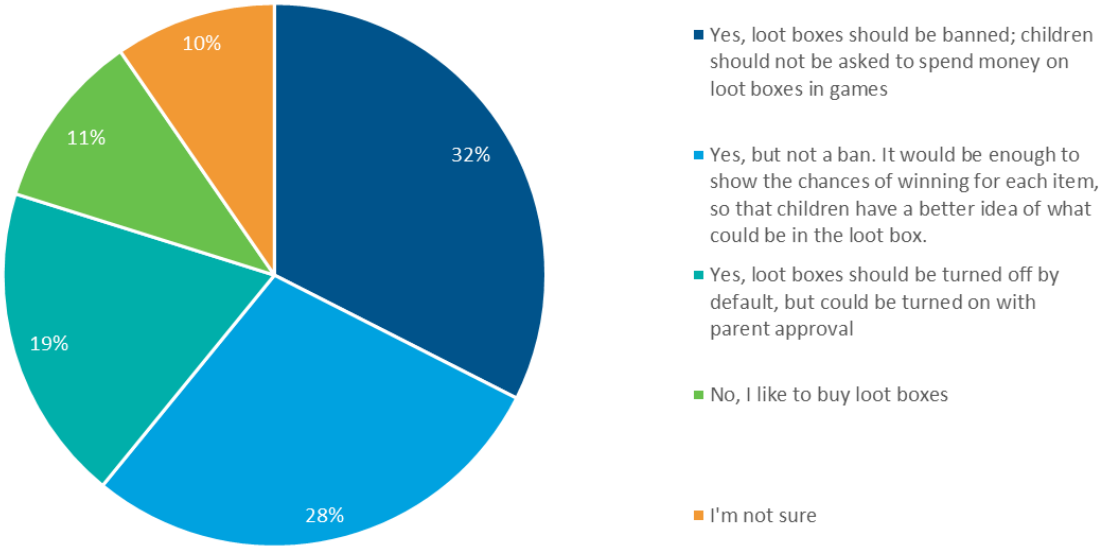
There were some differences between Member States, but due to small number of responses for specific questions, it is not feasible to draw clear conclusions.

3 Spending maximising features

3.1 Most children ask for rules for loot boxes

The majority of children favoured some kind of rule regarding loot boxes (80%, N=3,766) (see Figure 3.1). Around a third reported that loot boxes should be banned altogether (32%, N=1,532) and 28% did not want a ban but instead advocated for the chances of winning each item to be clearly displayed (28%, N=1,341). Just under a fifth of children felt that loot boxes should be turned off by default and allowed to be turned on with parental approval (19%, N=893). Just over one in 10 children believe there should be no rules (11%, N=498), and another 10% of children were not sure about the rules for loot boxes (N=453).

Figure 3.1 Children favour some kind of rule for loot boxes (N=4,717)



Note: Q6: 'Do you think there should be any rules about loot boxes when they are shown to children?' Single choice question.

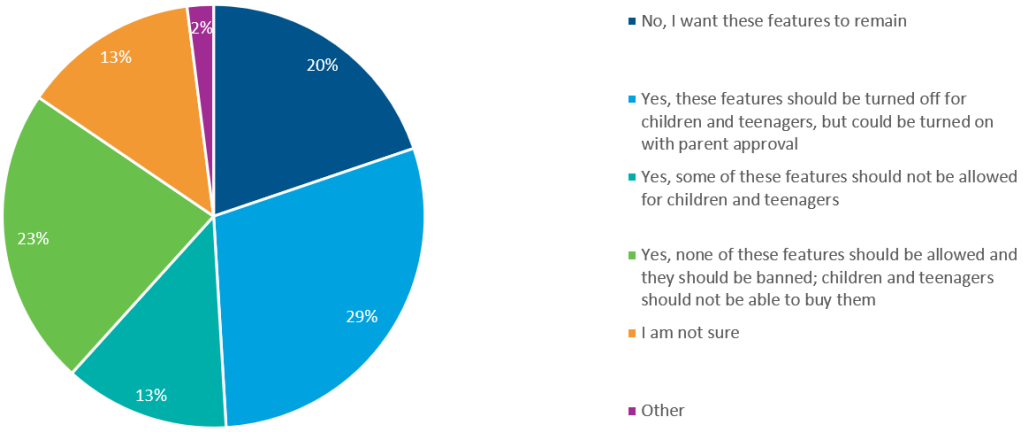
There were no clear differences in opinion across age groups, but younger children were more likely to report uncertainty regarding rules (14% of 12-year-olds, N=53) compared to older children (6% of 17-year-olds, N=67). **Girls were far more likely to favour rules regarding loot boxes compared with boys**. The majority of girls wanted loot boxes to be banned (40%, N=1,021, compared with boys (24%, N=463). 4% (N=112) of girls believed there should be no rules, compared with 18% (N=355) of boys.

There were some differences between countries, but due to small number of responses for specific questions, it is not feasible to draw clear conclusions.

3.2 Most children favour rules for pay-to-win or pay-to-progress features

Most children favoured some kind of rule regarding pay-to-win or pay-to-progress features (64%, N=3,027) (see Figure 3.2). Children were mostly in favour of turning these features off by default, but allowing them with parent approval (29%, N=1,369) and 13% (N=592) believe some features should not be allowed for children and teenagers. **Nearly one in four children favoured a complete ban** (23%, N=1,066). Around one in five children said they wanted these features to remain (20%, N=927).

Figure 3.2 Children favour rules for pay-to-win/pay-to-progress features (N=4,716)



Note: Q7: 'Do you think there should be any rules about pay-to-win or pay-to-progress features when they are shown to children?' Single choice question. Some small edits have been made to the percentages in the figure to ensure this rounds to 100%.

Older children were more likely be in favour of a complete ban (26%, N=270) compared with younger children (18%, N=69). Younger children were more likely to report uncertainty regarding rules (17%, N=65) compared to older children (10%, N=102). **Boys were far more likely than girls to oppose rules on these features** with 29% (N=566) wanting the features to remain, compared with 12% (N=319) of girls. There were no clear differences between Member States for this feature.

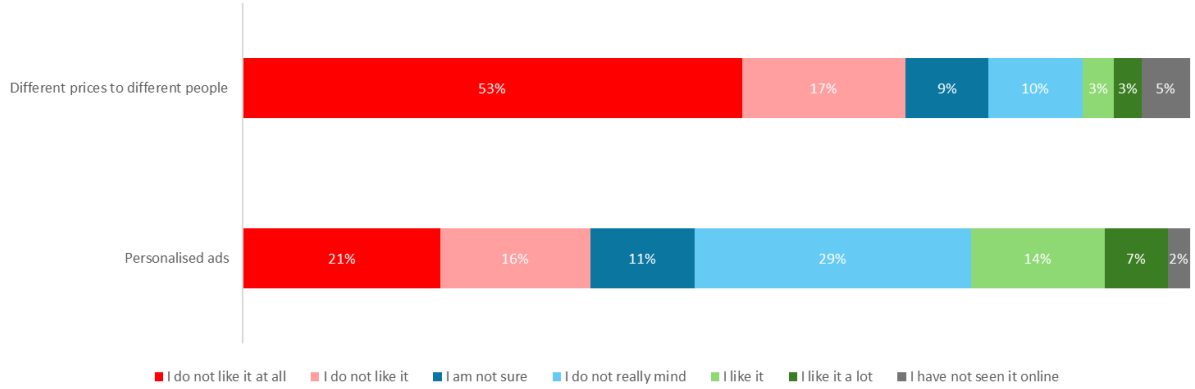
4 Opinions on personalised ads and prices

4.1 Children express a spectrum of opinions regarding personalised ads and largely dislike the use of different prices for same things for different people

Most children did not like (37%, N=1,691) or were indifferent to the use of personalised ads (29%, N=1,346) (see Figure 4.1). Just over one in five children felt positive towards this practice (21%, N=984). There were no clear differences across the age groups or genders. There were some differences between the Member States, but due to the small number of responses for specific questions, it is not feasible to draw clear conclusions.

The majority of children opposed the use of differentiated prices for same products (70%, N=3,229), with 53% (N=2,431) strongly opposed and 17% (N=798) opposed to it. 6% of children liked it (N=289) and 10% of children indicated that they do not really mind (N=475) (see Figure 4.1). There were no clear differences across age groups, Member States or genders.

Figure 4.1 Most children do not like or are indifferent to personalised ads (N=4,636) and oppose the use of different prices (N=4,615)



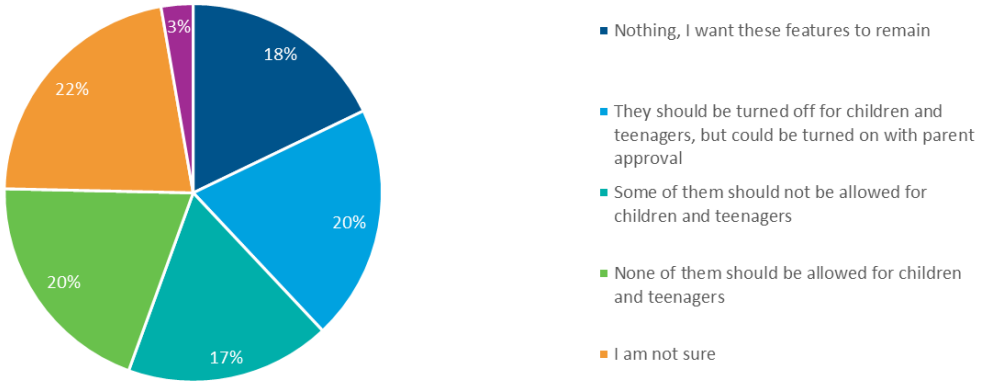
Note: *Q8.1: 'What do you think about apps, websites and online shops using personalised ads and different prices? (Personalised ads)?' Single choice question. Q8.2: 'What do you think about apps, websites and online shops using personalised ads and different prices? (Different prices to different people)?' Single choice question. Some small edits have been made to the percentages in the figure to ensure this rounds to 100%.*

4.2 Children want stronger controls over personalised ads and prices

Over half of children wanted stronger controls over personalised ads and prices (58%, N=2,720) (see Figure 4.2). Among those children, 20% said that these features should be turned off for children and teenagers but could be turned on with parental approval (N=972). another 20% suggested that none of these features should be allowed (N=926), and 17% indicated that some of these features should not be allowed (N=822). Just under one in five wanted the features to remain (18%, N=836), 22% were not sure (N=1,026) and 3% indicated 'other' (N=128). **Boys (23%, N=451) were more likely than girls to want the features to remain** (13%, N=345). There were no clear differences across age groups.

There were some differences between countries, but due to the small number of responses for specific questions, it is not feasible to draw clear conclusions.

Figure 4.2 Children desire stronger controls over personalised ads and pricing (N=4,710)



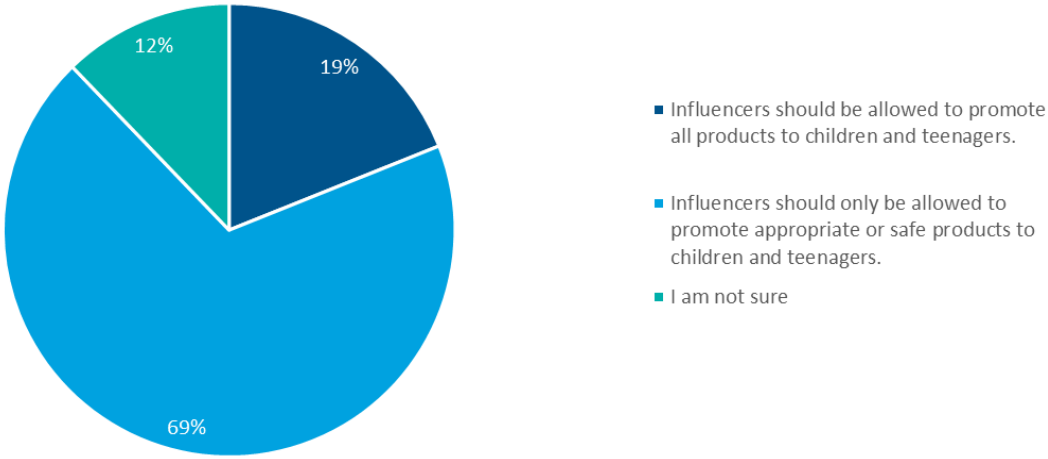
Note: Q9: 'What should apps, websites and online shops do about personalised ads and showing different prices to children and teenagers?' Single choice question. The figure presents rounded percentages. Using the unrounded values, the cumulative share of children wanting stronger controls over personalised ads and pricing is 58%, rather than the 57% implied by the rounded figures shown in the figure.

5 Role of influencers promoting products

5.1 Children favour tighter controls on influencer advertising

The majority of children believed that influencers should **only** be allowed to promote appropriate or safe products to children (69%, N=3,295), under one in five children believed there should be no limits (19%, N=907), and 12% of children were not sure (N=584) (see Figure 5.1).

Figure 5.1 Children favour tighter control on influencer advertising (N=4,786)

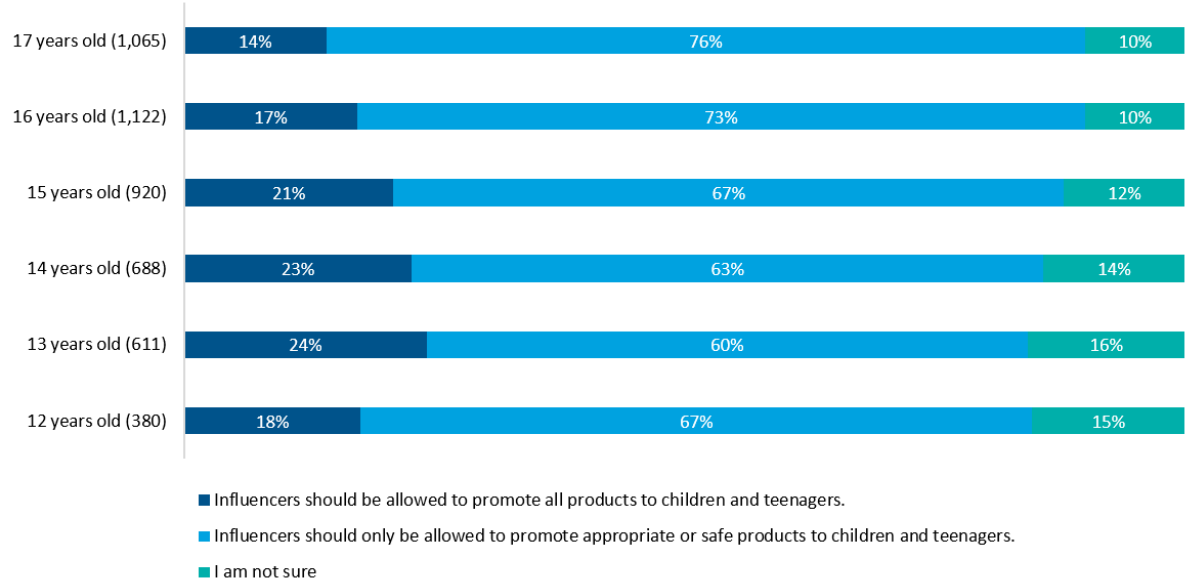


Note: Q10: 'Do you think there should be rules about what influencers are allowed to promote to children and teenagers?' Single choice question.

As children got older, they were more likely to favour controls on influencer advertising, with 76% of 17-year-olds teenagers believing there should be rules compared with 67% of 12-year-olds children (see Figure 5.2). Girls (75%, N=1,948) were also more likely than boys to favour controls on influencer advertising (62%, N=1,240).

There were some differences between countries, but due to the small number of responses for specific questions, it is not feasible to draw clear conclusions.

Figure 5.2 Older children more likely to favour controls on influencer advertising (N=4,786)

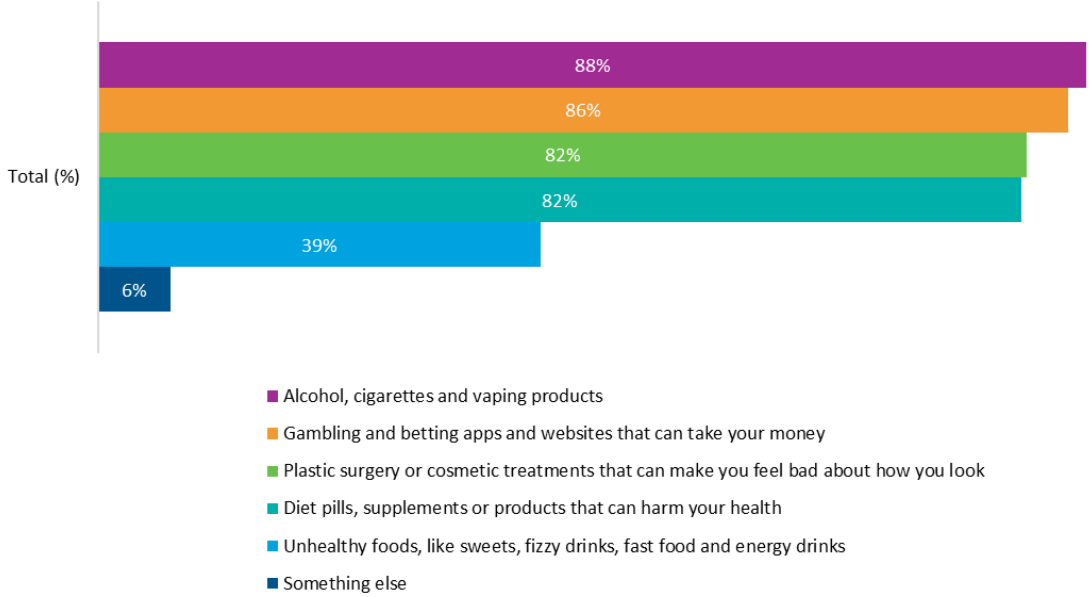


Note: Q10: 'Do you think there should be rules about what influencers are allowed to promote to children and teenagers?' Single choice question. Some small edits have been made to the percentages in the figure to ensure this rounds to 100%.

5.2 Children highlight products that should not be promoted to children

The majority of children were in favour of a ban on promotion of products such as alcohol, cigarettes and vaping products (88%, N=2,865), gambling and betting apps (86%, N=2,812), plastic surgery or cosmetic treatments (82%, N=2,691), and diet pills and supplements (82%, N=2,675). Children were less opposed to the promotion of unhealthy foods (39%, N=1,282) (see Figure 5.3).

Figure 5.3 Children oppose certain products to be advertised to children (N=3,267)



Note: Q11: 'Please tick all the products that you think are not appropriate or safe and should not be promoted to children.' Multiple choice question.

Overall, there were limited differences across age groups, but older children (89%, N=748) were more opposed to the promotion of gambling or betting apps compared with younger children (78%, N=202). There were no clear differences across the genders.

There were some differences between answers from children from different Member States, but no clear conclusions could be reached due to small sample sizes.

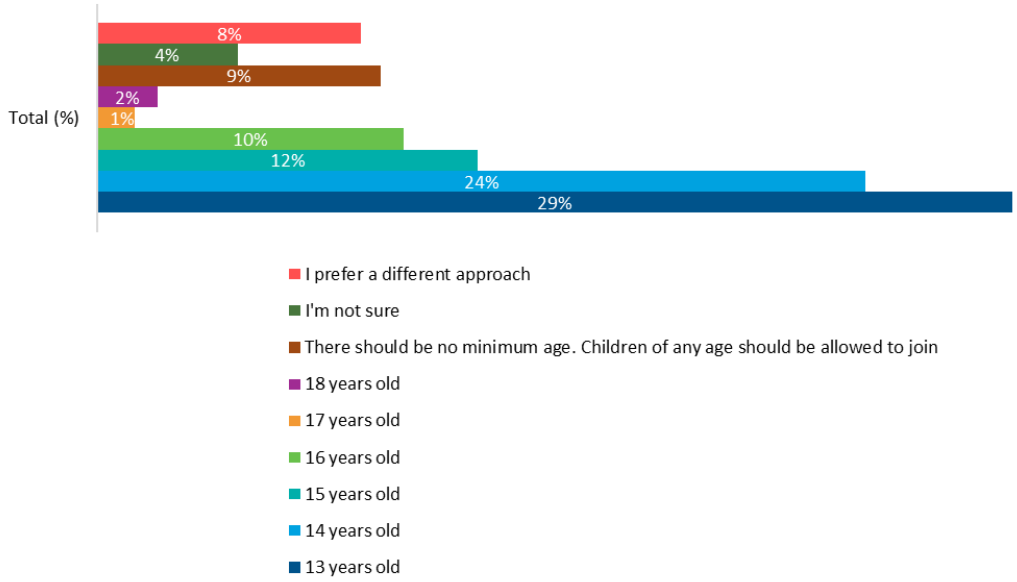
6 Joining social media

6.1 Children have different views on the age for joining social media

The majority of children suggested a specific age, ranging from 12 to 18 for joining social media (78%, N=3,730) (see Figure 6.1). Responses showed a clear pattern by respondents' own ages.

Older respondents were more likely to think children should be older before joining social media, while younger respondents were more likely to say that children should be able to join at a younger age, or that there should be no set age (see Figure 6.2). Among younger respondents, 35% of 12-year-olds (N=132) and 48% of 13-year-olds (N=290) believed children should be 13 before they can join social media. By comparison, this view was held by 19% of 17-year-olds (N=199). Younger children were also more likely to say that there should be no set age before children can join social media (16% of 12-year-old children, N=60) compared with 6% of 17-year-olds (N=65) (see Figure 6.2).

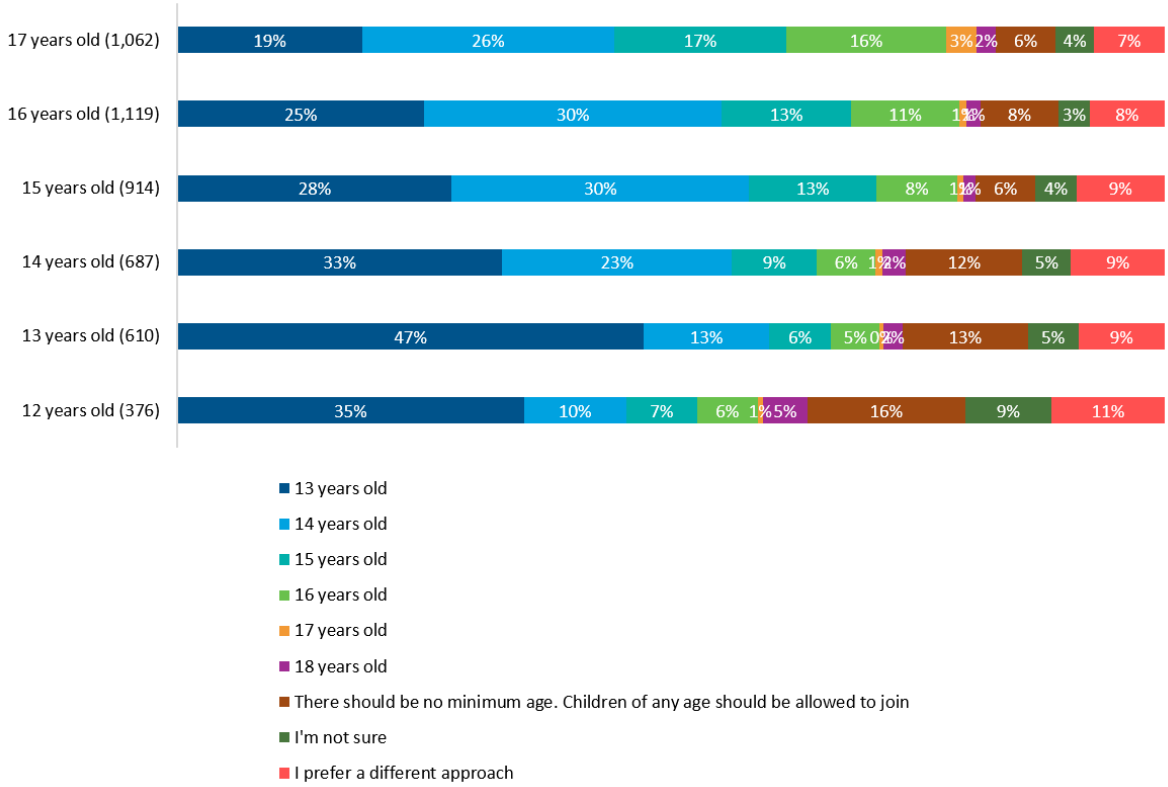
Figure 6.1 Children have different views on the age to join social media (N=4,768)



Note: Q12: 'How old do you think children should be before they can join social media?' Single choice question.

There were some differences between countries, but due to the small number of responses for specific questions, it is not feasible to draw clear conclusions.

Figure 6.2 Views on social media age limits increased with children's age (N=4,768)



Note: Q12: 'How old do you think children should be before they can join social media?' Single choice question. The figure presents rounded percentages, as a result the totals may not sum 100% in certain instances. Some small edits have been made to the percentages in the figure to ensure this rounds to 100%.

Boys were more likely than girls to say that there should be no set age before children can join social media, selected by 13% of boys (N=256) compared with 5% of girls (N=134). There were no clear differences between boys and girls when their responses identified a specific age when children should be before joining social media.

6.2 Children suggest alternative approaches to age rules for social media

Respondents who selected "I prefer a different approach" in Q12 were asked to present their own ideas in an open-ended response to this question (Q12a). In total, 361 comments were submitted, with 203 considered valid. Box 1 summarises the main themes and suggestions that emerged from these written responses.

Box 1: Suggestions and recommendations from children for different approaches to age rules for social media

Parents as main decision makers

Some children recommended that parents should decide if and when a child can use social media, often combined with ongoing supervision. Children argued that parents know their child best and they should be the ones to retain responsibility.

"Parents should set the limit not the state" [Girl, 15, Spain]

Maturity and individual readiness

Some children said access should depend on individual maturity and readiness, rather than age alone. The responses highlight that children develop at different paces.

"I don't think it depends on age. There are older children who think like a child… but there are also younger children who are MATURE and I think they can access the networks." [Other, 12, Romania]

Parents were also considered as the best judge of readiness.

"Parents should be the ones to decide if their children are mature enough to navigate the internet by their own, or if they need supervision." [Gender not provided, 15, Germany]

Some children also suggested passing some form or maturity or safety test.

"A test should be conducted on the person who wants to use the specific application. This way, there will be an automatic limit on the use of the application based on the result." [Girl, 14, Cyprus]

"There should be a psychological test for minors. If you don't pass it the first time, you should have this chance every month." [Boy, 16, Romania]

Alternative age thresholds

Some children suggested alternative age thresholds to those originally presented in Q12. The ages are suggested below.

- Higher ages (15-18): Children called for higher thresholds, especially for full functionality, citing immaturity of teenagers.
  "Honestly, it should be at 18, most teenagers are not formed." [Girl, 16, Romania]

- Younger ages (10-11): Children favoured earlier access, often with stronger supervision or limited functionality.
  "It is best to have a minimum age of 10 years, but be monitored by parents." [Boy, 15, Romania]

- Very young/no minimum with safeguards: Children advocated for very young access or no fixed minimum, provided there are strong parental controls.
  "There should be no minimum age. Children of any age should be able to participate with parental consent." [Boy, 13, Romania]

Staged access by age

Some children recommended access being phased, with different permissions or content at different ages, for instance a system to mirror how children gradually gain autonomy offline.

> *"Children from 4 to 6 years old should only use YouTube Kids… children from 12 to 16 years old should use what is in their age category, and from 17 to 18+ everything." [Girl, 13, Slovakia]*

Rules and restrictions based on content or features

Some children wanted to move away from a ban excluding children from social media altogether and instead suggested to introduce rules and restrictions on what they can see and can do and how online traders operate.

> *"It would be great if social media could be configured so that content is age-appropriate. Not a ban or minimum age requirement, but rather certain content only for a specific age group." [Girl, 13, Slovakia]*

Some children also suggested to distinguish between types of content.

> *"I believe that entertaining content should not be subject to an age restriction, unlike promotional content." [Boy, 15, France]*

Some children also called for stronger regulation, moderation and design standards.

> *"Regulating social media instead of banning it like making it safer." [Girl 15, Ireland]*
> *"Address the problem itself (combat addiction mechanisms in general, not just when it comes to children)." [Girl, 17, Germany]*

Different rules by app

Some children thought that rules should vary by type of trader or content rather than one rule of social media as a whole. Respondents distinguish messaging apps from short-video platforms or games.

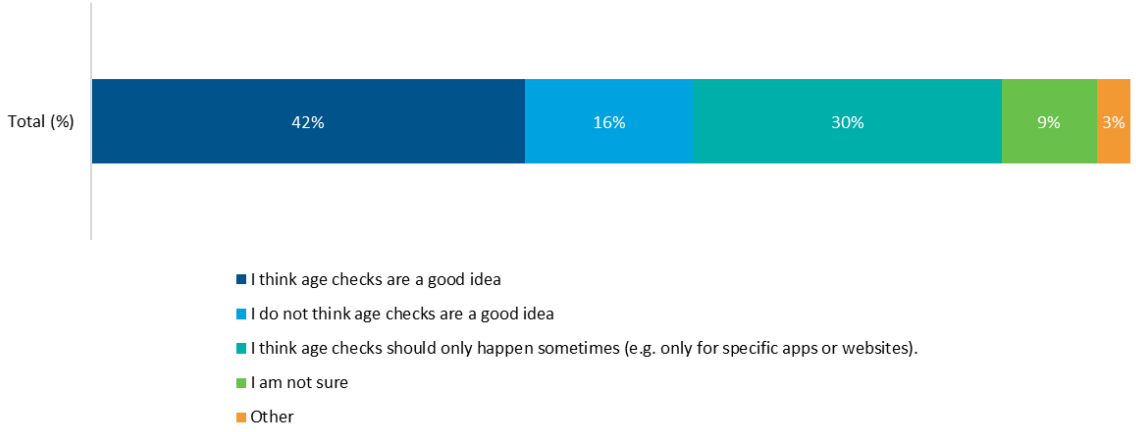
> *"I think each app has a different age limit, e.g. 16 for Instagram but 13 for Snapchat." [Boy, 17, Ireland]*

6.3 The majority of children favour some form of age check

The majority of children favoured some form of age check (72%, N=3,369), with 42% (N=1,968) thinking they were a "good idea" and 30% of children suggesting that age checks should only happen sometimes (N=1,401) (see Figure 6.3). On the contrary, 16% of children did not think that age checks are a good idea (N=783). Finally, 9% of children were not sure (N=429) and 3% selected the 'other' option (N=154).

There were no clear differences between age groups. **Boys were much less in favour of age checks, compared with girls**. Nearly one in four boys thought than age checks were not a good idea (24%, N=464), compared with only one in 10 girls (10%, N=262).

Figure 6.3 Age checks favoured by most children (N=4,735)



Note: Q13: 'Some apps and websites might check how old you are before letting you see certain things online. What do you think about this?' Single choice question. Some small edits have been made to the percentages in the figure to ensure this rounds to 100%.

6.4 Children highlight specific apps and websites that should be subject to age checks

Respondents who selected "I think age checks should only happen sometimes (e.g. only for specific apps or websites)" in Q13 were asked to say which specific apps or websites should have these checks in an open-ended response (Q13a). In total, 745 comments were submitted, with 714 considered valid. Box 2 summarises the main themes and suggestions that emerged from these written responses.

Box 2: Children's suggestions about specific traders, websites and apps that should be subject to age check

Online traders, social media and messaging apps

Suggested sites that require an age check included TikTok, Instagram, Snapchat, Facebook.

> *"Dangerous and too influential for little ones." [Other, 16, Romania]*

Adult-only or general age restricted services

Children frequently referred to "18+ sites", "adult-only" or "apps that are only allowed for those 18+" as a broad category where age checks are clearly expected.

> *"Anything that is for an 18+ audience should be age-verified" [Girl, 16, Romania]*

Some children worried about how intrusive checks could be, distinguishing between reasonable gates and invasive identity verification.

> *"I think apps with content unsuited for minors should have age checks, but I absolutely think they shouldn't come in the form of ID checks, mostly because they're invasive upon citizens." [Girl, 16, Romania]*
> *"I would make the phone save the age I've verified, and then the apps would adjust accordingly." [Boy, 12, Germany]*
> *"Age verification is vital for protection against predators on social platforms, but it should not become a barrier to access information or a risk to children's biometric data." [Girl, 16, Romania]*

Gambling

Many children mentioned gambling, betting, poker, lotteries and casino sites also requiring age checks, because these websites create financial risks for users and are addictive.

> *"Any gambling websites should be regulated because you can lose money there" [Boy, 13, Germany]*
> *"Digital casino apps, or anything where you pay money and then likely get scammed" [Boy, 12, Germany]*

Pornography, sexual or explicit content

Children recommended pornography and sexual content websites to require age checks.

> *"Websites with pornographic content" [Gender not provided, 12, Belgium]*

Gaming

Online games features were seen as an area for targeted age checks, particularly for online or violent games, and games involving spending real money.

"Brawl Stars…Clash Royal" [Boy, 15, France]
"Roblox, Fortnite, GTA" [Girl, 17, Germany]
"Games where you can buy many things with real money" [Boy, 16, Austria]

Shopping, purchases, payments or commercial sites

Some respondents focused on commercial and payment-related services, highlighting the risk of unmonitored spending and children buying age-restricted purchases.

"Websites where you can buy things, order online" [Girl, 16, France]
"Apps/websites where you can buy things" [Boy, 16, Germany]
"When trying to buy alcohol, vapes or other items with an age required for them" [Girl, 16, Ireland]
"Sites that sell products prohibited to minors e.g. cigarettes, alcohol" [Girl, 16, Romania]

Dating, meeting strangers or adult contact

Respondents identify dating apps and apps for meeting strangers as needing strong age checks, often due to concerns about adult contact and grooming.

"Dating apps" [Girl, 15, Czechia]
"Websites and apps for adults over 18, such as Tinder" [Boy, 14, Germany]

7 Children's suggestions to make the online world fairer and safer for children

Children were invited to give their own suggestions and recommendations on what might make the online world fairer and safer for children and teenagers through an open text question (*Q14 Do you have any other ideas for the EU to make the online world fairer and safer for children and teenagers?*). A total of **1,685 open text responses** were received, of **which 1,092 were valid**[8] and included in the analysis.

The following paragraphs in this section present children's suggestions clustered into key themes.

Education and digital literacy

Children asked for education and media literacy to help keep children safe online; **often preferred over bans or technical controls.** Children called for more structured teaching in schools, as well as resources for parents or carers.

- Many children argued that online safety should be embedded early in the curriculum.

  "Educate children about online safety especially in primary school level" [Boy, 16, Ireland]

  "There should be information at school about the risks and proper use of the internet" [Girl, 16, Greece]

  "More education! Starting in primary schools, and especially highlighting the problematic effects to [instil] a certain 'fear' in children" [Girl, 15, Germany]

- Many children recommended focusing efforts on education instead of restriction or surveillance.

  "Education is key, not walls. 'Safety' is just an excuse for surveillance" [Boy, 14, Czechia]

  "Don't be too restrictive; it's better to invest in educating and informing children so they can cope better. Prevention is better than prohibition" [Boy, 16, Italy]

- Children also highlighted the need to support adults:

  "Explain to adults how the online world works… so that they can help young people if something happens" [Girl, 12, Netherlands]

  "Parents should be taught how to deal with their children's social media, but they should not block them" [Boy, 17, Spain]

Parental responsibility and involvement

- Children thought that parents and carers should play a central, active role in managing children's lives online, often in preference to state or trader-level control.

  "Provide parents with incentives and training to guide their children more safely through the internet" [Boy, 16, Germany]

  "Helping parents to better understand us, teaching parents how to help us rather than always forbidding things" [Boy, 16, France]

- Children also specified concrete tools such as parental control, shared accounts or approvals.

[8] A total of 593 responses were removed from the analysis due to containing non-substantive content (i.e. text identified as a non-response, malicious and/or trolling).

"Parental control on the phone for children under 13 (mandatory)" [Girl, 16, Latvia]

"Every family must set up parental controls on mobile phones, tablets, etc. for children under 10 years old" [Boy, 13, Germany]

"For any application… a parent's email should be requested, who can only confirm that they are giving consent" [Girl, 16, Romania]

- Children also stressed that decisions should remain with parents/family and not be dictated by the state.

"Leave the decisions about us to our parents" [Girl, 15, Czechia]

"It doesn't really depend on the EU… it's a parental decision" [Boy, 13, Germany]

Age limits for access

Children frequently discuss explicit age thresholds for phones, games and social media, but opinions differed on where the line should be drawn and how rigidly it should apply.

- Some children called for higher minimum ages.

"Only allow social media from the age of 16" [Girl, 14, Germany]

"Age limit for social networks at 18. Social networks have a very negative impact on the development of young people" [Girl, 17, Czechia]

- At the same time, some children stressed individual maturity.

"I think the minimum age for accessing social media depends a lot on the person, since maturity is necessary" [Girl, 12, Portugal]

Children expressed extensive comments on age checks, with strong demand for more yet effective privacy-preserving systems, alongside significant scepticism and opposition.

- Children criticised current approaches and both ineffective and intrusive.

"Half of the age verification tools are useless, since most just ask you to enter your birth year and don't actually verify it" [Girl, 17, Spain]

"Current age verification tech can have severe privacy issues and also can be bypassed quite easily" [Boy, 15, Ireland]

- Children proposed more secure, anonymous or centralised solutions.

"Age checks would be a good idea only if they are entirely secure. For example, if the age check is performed on-device and a hash is sent to the website" [Boy, 17, Bulgaria]

"Anonymous and secure age verification… an EU-wide, data protection-friendly solution" [Boy, 15, Germany]

"A standardized European system that confirms that you are a minor or an adult without exposing your personal data" [Boy, 16, Romania]

Content restrictions for children

Children widely support targeted restrictions on harmful or adult content.

- Pornography, sexual content and violent content are the most frequently cited concerns.

"Increased internet protection through the blocking of content unsuitable for minors, e.g., pornography or consumer/intoxication products" [Girl, 15, Germany]

"Ban pornographic websites… Censor videos that promote cosmetic surgery, 'miracle cures' for weight loss" [Girl, 16, France]

"Check content for pornography more carefully to protect yourself! Filters often fail" [Boy, 15, Germany]

Children also suggested restricting types of content (not social media). "They should only prohibit certain content based on criteria voted on by education or psychology professionals, not politicians" [Boy, 15, Spain]

"Don't limit social media totally… but put restrictions on the content allowed to be published on social media" [Girl, 15, Ireland]

Safer online environment and product design

Children highlighted safety-by-design and interface changes as key to protecting children without over-relying on age checks or bans.

- Several children called for safety-by-default products.

  "Digital product designs that are safe by default and designed with the well-being of children and adolescents in mind, not to cause harm or dependence" [Girl, 17, Spain]

  "A unique access badge between the user and the site to filter access. No more advertising, and zero (…) addictive design on sites for those under 18" [Boy, 12, France]

- Other children focused on curbing manipulative features.

  "Regulate manipulative designs and reduce dependence on the online world" [Boy, 15, Denmark]

  "Mandatory disabling of addictive features for minors, usage time limits, ban on targeted ads and greater transparency in algorithms" [Girl, 17, Cyprus]

Algorithms and recommender systems

Children expressed concerns about attention maximising features such as infinite scrolling or opaque recommender systems.

- Children asked for more control and transparency.

  "Algorithms should be voluntary and user-controlled. I do not support surveillance, and education should be invested in" [Boy, 17, Poland]

  "Control the algorithms" [Boy, 16, France]

- Children associated infinite scroll and recommendation loops with overuse.

  "Less ubiquitous scrolling" [Boy, 15, France]

  "Create ads that remind teenagers to do other activities rather than doomscrolling" [Girl, 17, Spain]

Screen time and usage limits

Children propose time-based controls to limit excessive use, especially for younger children.

"Imposing a limit on usage times" [Girl, 16, Italy]

"Maximum screen time required" Girl, 16, France]

"There should be fixed screen time for specific applications such as Instagram and Tiktok depending on the user's age" [Girl, 17, Cyprus]

Reporting, moderation and enforcement

Children asked to strengthen reporting channels and enforcement mechanisms against abuse, illegal content and harmful behaviour.

- Children want easier, more responsive mechanisms.

> *"Better reporting system" [Girl, 15, Ireland]*
>
> *"Improving and creating a penal system and increasing the number of administrators on the Internet. Removing the creators of malicious content" [Girl, 17, Poland]*
>
> *"Immediately remove comments that are harassing and insulting from social media" [Girl, 15, Germany]*

Privacy, anonymity and data protection

Children expressed **strong concerns about data collection, surveillance and loss of anonymity**, often in direct tension with calls for stronger age checks.

> *"I would like to be anonymous, I don't want companies to know who I am" [Boy, 17, Poland]*
>
> *"Keep child identities anonymous instead of us having a digital footprint and portfolio before we reach adulthood" [Boy, 16, Ireland]*

- Several children explicitly opposed ID-based checks on privacy grounds.

> *"Please do not implement age verification laws as seen in the UK and Australia. These only serve to leak people's data" [Boy, 17, Ireland]*
>
> *"The online environment is already safe, applying data collection and age verification measures is a complete violation of independence, security, privacy and will lead to dystopia" [Gender not provided, 17, Romania]*

- Broader surveillance concerns also appear in points raised by children.

> *"Stop using 'child protection' as an excuse to impose mass surveillance, user identification, and muzzle the internet" [Boy, 16, Italy]*
>
> *"Child protection is good, but surveillance and prohibition are not the solution" Boy, 17, Austria]*

Role of government and EU

Views on how far the EU and government should intervene were mixed, ranging from calls for robust regulation to demands for minimal involvement.

- On one side, some children want stronger state action.

> *"The more regulation, the better. The EU should regulate all aspects of the online world" [Boy, 17, Estonia]*
>
> *"Create a universal standard across all EU countries and streamline enforcement" [Boy, 16, Greece]*

- However, children also warned against overreach and politicisation.

> *"Please do not implement age verification laws… This is government and EU overreach" [Boy, 16, Ireland]*
>
> *"These are things the parents are supposed to look after, not the government" [Boy, 16, Finland]*

Child-friendly spaces and tools

Children suggested creating dedicated, age-segmented online environments and tools for children and teenagers.

- Children suggested parallel or tiered version of existing services.

"There should be different versions of apps, for example YouTube with YouTube kids could create YouTube teens" [Girl, 13, Cyprus]

"Each platform should have applications dedicated to children where the algorithms work differently and the content is also validated by educational experts" [Boy, 17, Romania]

"Create a WhatsApp-like contact app for minors where they can only have contacts authorized by their parents" [Girl, 13, Spain]

Mental health, wellbeing and offline life

Children also linked online safety to broader mental health, body image and the value of offline life. Some children explicitly frame social media as addictive and socially corrosive.

"To rediscover healthy [society], it's essential to free minors from the addiction to appearing, posting, and buying. It teaches them about outdoor life and real relationships" [Boy, 16, Italy]

"Prevent cyberbullying, prevent addiction to the online world as that diminishes people's real social interaction" [Boy, 16, Ireland]

"Please, motivate children to do more activities outside of the online social environment" [Boy, 17, Austria]

Annex 1 Consultation methodology and characteristics of children participating in the consultation activities

A1.1 Consultation methodology

Consultation design

Children's contributions to EU-level consultation addresses the first objective of the Platform 'to gather the views of and to consult children, across several EU Member States, on matters that concern them, including on future specific policy and legislative initiatives.'

The Platform consultations were designed to provide a meaningful, inclusive and safe space for children to share their ideas. The Platform's consultations are implemented via online surveys, and online and in-person focus groups and interviews.

The consultation on The Digital Fairness Act was carried out as an online survey and was guided by the principles of the Lundy model of child participation[9]. The survey questions were based on the European Commission's open public consultation in view of the upcoming Digital Fairness Act and were adapted for a child-audience.

Questionnaire

The draft text of the online survey questionnaire was reviewed by children who are members of the EU Children's Participation Platform Advisory Board. Its format and length reflected suggestions received from children during previous consultations.

The questionnaire was then translated into all EU official languages. DG JUST ensured the translations' quality check.

Outreach & recruitment

The survey was shared and promoted through Platform outreach (Child Empowerment Officers (CEOs), Central Office Colleagues and Secretariat), the Platform's website, and the European Commission Rights of the Child and the European School Education Platform newsletters. Several social media channels were used to disseminate the survey, including EURights (LinkedIn/Instagram), and EU Youth (Instagram/Facebook). The survey was also featured on the Learning Corner website.

The CEOs encouraged a diverse participation to the survey by sharing information with vulnerable and underrepresented groups of children.

Challenges and limitations

This fifth consultation conducted under the EU Children's Participation Platform built on the experiences of earlier consultations, addressing previous challenges and limitations. The survey was hosted on the Forsta platform, which improved its child-friendliness and overall design. However, the survey was open for only four weeks. Despite this, the consultation achieved a high number of responses, though participation varied between countries.

[9] https://commission.europa.eu/system/files/2022-12/lundy_model_of_participation_0.pdf

Approach to the survey analysis

Data cleaning

Prior to analysis all survey data underwent a rigorous data cleaning procedure. A captcha score was generated for each of the respondents which provided some indication if the response was genuine or from automated bots. The captcha score ranges from 0 to 100, with higher scores indicating a lower risk. We used thresholds[10] to assess user legitimacy. Scores above 50 were recorded as legitimate responses. In total, 202 responses were recorded as having low captcha scores and were subsequently removed from the analysis. Due to the targeted nature of the survey's intended audience, influencing campaigns were not deemed relevant and by extent campaign detection was not performed on the dataset. Machine translations were performed using AI from the respondent's original language into English for consistent analysis.

Closed questions

The analysis of closed questions was performed using Microsoft Excel Power Query to define complex relationships between variables. The study team automatically extracted quantitative data using pivot tables, preventing human error in calculations, and allowing for dynamic cross-tabulation of results to multiple questions.

Open text questions

Thematic analysis was used as the primary method to assess open text responses (supported by the Perplexity AI and ChatGPT tool). This included uploading cleaned data to the tool, producing formal coding libraries to act as an analytical framework. Coding libraries were heavily informed by the responses provided in the replies to each question, however the study team reviewed these for suitability prior to continuing the analysis. Therefore, the approach to coding is not a true 'grounded theory' approach. The AI tool was used to assign codes (themes and sub-themes) from the coding library against each response to produce an analytical trail. The study team then manually reviewed the coding for suitability against each response. AI was then used to produce a summary narrative of key arguments against each question. The study team verified these through cross-checks of findings and quotes against the original data. The selection of suitable quotes was included for final reporting.

A1.2 The survey in numbers

In total, 4,989 children aged between 12-17 years participated in the survey. However, some responses were flagged as being a low CAPTCHA response and therefore risky and as a result were removed from the analysis and the respondent profile.

[10] reCAPTCHA is a security tool that helps websites tell the difference between real users and automated bots, often by checking user interactions in the background without interrupting genuine visitors. For more information, see: https://www.capsolver.com/blog/reCAPTCHA/recaptcha-score-explained

Respondent by gender:

Gender	N	%
Girl	1,993	42%
Boy	2,604	54%
I don't want to say	62	1%
Other	127	3%
Total	**4,786**	**100%**

Respondent by country:

Country	N	%
Germany	1,810	38%
Romania	1,602	33%
Ireland	171	4%
Denmark	159	3%
Spain	116	2%
Czechia	115	2%
Belgium	107	2%
France	104	2%
Austria	94	2%
Croatia	63	1%
Lithuania	61	1%
Latvia	60	1%
Poland	56	1%
Bulgaria	43	1%
Cyprus	39	1%
Italy	35	1%
Greece	32	1%
Netherlands	27	1%
I'm an EU citizen living abroad	21	<1%
Slovakia	19	<1%
Hungary	13	<1%
Portugal	10	<1%
Slovenia	9	<1%
Estonia	7	<1%

Country	N	%
Malta	5	<1%
Sweden	5	<1%
Finland	2	<1%
Luxembourg	1	<1%
Total	4,786	100%

Respondent by age:

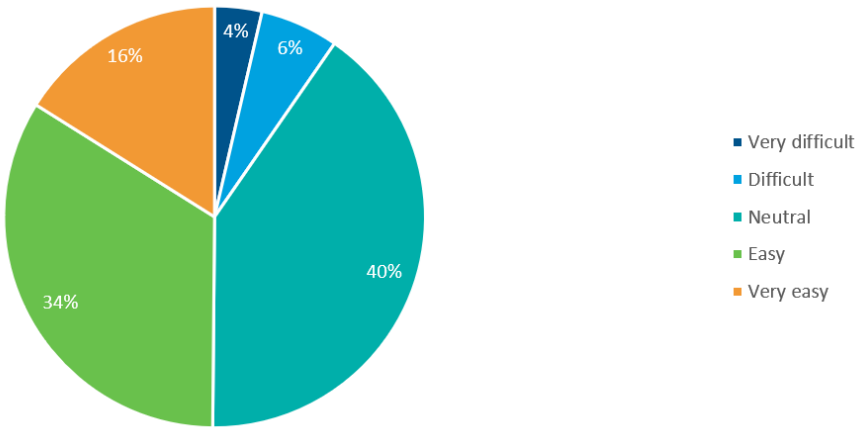
Age (years)	N	%
12	380	8%
13	611	13%
14	688	14%
15	920	19%
16	1,122	23%
17	1,065	22%
Total	**4,786**	**100%**

A1.3 Feedback from children

A1.3.1 Majority of children found the survey easy to answer

Children were asked for feedback on how they found the questions in the survey (see Figure A1.1). The majority of children found the questions in the survey easy to answer with 16% (N=782) reporting that it was ‘very easy’ and 34% (N=1,591) reporting that it was 'easy’. 40% (N=1,908) reported that they were ‘neutral’ about the questions. Less than one in ten children found the questions hard with 6% (N=283) reporting that they were ‘difficult’ and 4% (N=171) reporting that they were ‘very difficult’.

Figure A1.1 Children found the questions in the survey easy to answer. (N=4,735)



Note: Q15: 'How easy did you find the questions in this survey?' Single choice question. Some small edits have been made to the percentages in the figure to ensure this rounds to 100%.