European Commission

Directorate-General for Communications Networks, Content and Technology
Platforms Policy and Enforcement
Unit F2 – Digital Services

Copenhagen, 7 April 2025

Invitation to provide input on recurrent and prominent systemic risks in the EU and on measures for their mitigation

Save the Children Denmark is grateful for the opportunity to provide inputs to the European Commission on recurrent and prominent systemic risks in the EU and on measures for their mitigation (Article 34 and 35 of the Digital Services Act).

Save the Children is the worlds's leading independent child rights organisation working to ensure the implementation of the rights lined out in the UN Convention on the Rights of the Child. Save the Children Denmark have a strong focus on children's rights online and work both nationally and at an EU-level to ensure the best possible protection for children online.

Save the Children Denmark's "SletDet Rådgivningen" (the DeleteIt Helpline) is Denmark's only professional counselling that provides specialised help to minors who have been exposed to digital violations or unpleasant experiences online. Since 2016, SletDet has helped children, young people, parents and professionals such as teachers to deal with digital violations e.g. sharing images without consent, harmful content, bullying on digital platforms, blackmailing with sexual material and grooming. The helpline also works preventively by offering advice and guidance in connection with concerns about digital violations or questions about legislation and rights. The SletDet Helpline offers confidential counselling via telephone, email and chat. In January 2025 the SletDet Helpline was awarded the status of trusted flagger under the Digital Services Act, Article 22.

In September 2024 Save the Children Denmark conducted an extensive representative survey of the past year concerning children's exposure to digital violations and unpleasant experiences online. The survey is based on responses from 4,171 children aged 9-17 years and on 14 interviews. The data below is largely based on the findings of this report.

Our response to the invitation to provide inputs regarding systematic risks and mitigation measures under article 34 and 35 concern question 1 and question 2.

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Question 1 A: Information suitable for identifying and assessing systemic risks which we find potentially prominent or recurrent

In the following we will outline the systemic risks we find especially prominent and recurrent. We will touch upon the different systemic risks mentioned in article 34, namely

> (a) the dissemination of illegal content through their services;
> (b) any actual or foreseeable negative effects for the exercise of fundamental rights (e.g. human dignity, protection of personal data, freedom of expression, freedom and pluralism of the media, consumer protection);
> (c) any actual or foreseeable negative effects in relation to gender-based violence, the protection of public health and minors and serious negative consequences to the person's physical and mental well-being.

The dissemination of illegal content

We will focus on our knowledge concerning content that is illegal under Danish law and relevant to our field of expertise, namely

> (1) Indecent exposure, sexual material of persons under 18 years of age and sharing of intimate material,
> (2) Defamation,
> (3) Unlawful photography, and
> (4) Threats and blackmail.

The following section explains to what extent Save the Children Denmark experiences these illegalities at VLOPs and VLOSEs.

(1) Indecent exposure, sexual material by persons under 18 and sharing of intimate material

In 2024 9% of children in Denmark experienced that other shared private or intimate photos or videos of them without their consent. In 2021, the figure was 3%. These numbers are especially high for children who feel lonely. Among them, 17% have had this experience, while the same applies to 8% of the remaining children.

The same pattern can be seen in the SletDet Helpline, where there has been a 40% increase from 161 cases in 2023 to 226 cases in 2024 concerning sharing/recording without consent. The majority of the cases concern children who experience nude or other intimate images or videos being shared against their will.[1]

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[1] https://sletdet.redbarnet.dk/wp-content/uploads/2024/10/Children-and-young-peoples-exposure-to-digital-violations-and-other-unpleasant-experiences-online-2024.pdf

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Snapchat is the most often used platform when children have private or intimate photos or videos shared without their consent. This was true for 61% of those who experienced it in 2024.[2]

Under Danish law indecent exposure also means that you cannot send sexual images (e.g. dick pics) to anyone without their explicit consent. Despite this, in 2024 18% of children received private or intimate photos that they did not want to see.[3] In 2021, the figure was 13%. 22% of those who have received private or intimate photos in 2024 experienced it at least once a month. Girls more often than boys experienced receiving private or intimate images they did not want to see. In 2024 13% of boys experienced this, for girls the figure was 24%.

70% of the children received the photos or videos from Snapchat and typically from someone they did not know.[4]

(2) Defamation

In 2024 29% of children received offensive comments online. In 2021, the figure was 18%. 24% of the 9-12-year-olds and 32% of the 13-17-year-olds experienced receiving offensive comments in 2024. Approximately one in three who received offensive comments online experienced this once a month or more often.

Furthermore, in 2024 8% of children experienced that rumours were spread about them. In 2021, 6% of children had experienced that others spread rumours about them online.[5]

Finally, in 2024 8% of children experienced others having manipulated photos or videos of them against their will. Half of the children who experienced others manipulating photos or videos of them experienced it on Snapchat.[6]

(3) Unauthorised photography

In 2024 25% of children in Denmark experienced being photographed, filmed or screenshotted against their will. In 2021, the figure was 10% of children. In 69% of the cases the act was conducted by someone who knew the child.[7]

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[2] Ibid.
[3] Ibid.
[4] Ibid.
[5] Ibid.
[6] Ibid.
[7] Ibid.

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69% of those who have experienced being photographed, filmed or screenshotted without permission, and 64% of those who have experienced rumours being spread experienced it on Snapchat.

(4) Threats and blackmail

In 2024 10% of children in Denmark experienced being threatened or extorted online. In 2021, the figure was 6%. In 2024 approximately the same number of girls and boys were exposed to threats and extortion - 11% of the boys and 9% of the girls. In 2021, the figure was 5% of boys and 7% of girls.

Threats and extortion are seen on both Snapchat, Roblox, Discord and TikTok. On Discord, it is almost exclusively experienced by boys, while girls most often experience it on Snapchat and TikTok.[8]

Conclusion

Save the Children Denmark's research shows a general and significant increase in the amount of illegal content being shared through VLOPs and VLOSEs.

Snapchat is the platform where most violations occur. The most common occurrence is receiving private and intimate photos, being filmed or screenshotted and having rumours spread about oneself.[9] When children see harmful content online, they usually see it on TikTok and YouTube. Conversely, in 2024 12% of the unpleasant experiences occurred on Discord which was only used by 29% of the children. There are also many unpleasant experiences on OmeTV where 4% of the unpleasant experiences online occurred in 2024 even though only 7% of children used that platform.

The criminal offence increasing the most is the sharing of private or intimate photos or videos. This has tripled from 3% in 2021 to 9% in 2024. Finally, it is clear that those who feel lonely are also the most vulnerable. In 2024 84% of lonely and vulnerable children were exposed to a digital violation or another unpleasant experience online.

Actual or foreseeable negative effects for the exercise of fundamental rights

The right to privacy

According to the UN Convention on the Rights of the Child, children have the right to privacy, also online.[10] In Save the Children Denmark's SletDet Helpline we experience that more children

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[8] Ibid.
[9] Ibid.
[10] See also European Union Charter of Fundamental Rights, Article 7.

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contact us because they have had personal material or information shared on VLOP and VLOSEs without their consent.

The right to protection from threats

Children have the right not to be threatened or blackmailed.[11] Yet Save the Children Denmark's research shows an almost doubling from 2021 till 2024 in blackmail cases over VLOP and VLOSE.

The right to be protected from violence, abuse and assault

Children have the right to be protected from violence, abuse and assault.[12] This means that no one can force them to do anything they do not want to do. They have the right to control their own body - physically, mentally and digitally. Yet, the SletDet Helpline sees a number of violent assaults taking place and being shared on VLOP and VLOSEs.

Conclusion:

In summary, it can be said that VLOP and VLOSEs are in many cases used for activities that go against children's fundamental human rights such as human dignity and protection of personal data.

Actual or foreseeable negative effects in relation to gender-based violence, the protection of public health and minors and serious negative consequences to physical and mental well-being

General Consequences:

The research form 2024 showed that 48% of children exposed to digital violations were negatively affected. Most often, they either became angry (19%), had a stomachache (17%) or did not know what to do about their distress (16%).[13] However, the SletDet Helpline is aware of multiple accounts of more severe consequences such as the need for psychological interventions and suicidal thoughts.

Furthermore, the study shows that the 9-12-year-olds (57%) were more negatively affected by the experiences than the 13-17-year-olds (44%). Similarly, girls (55%) and children who feel lonely (67%) were more negatively affected by the experiences than boys (39%) and children who do not feel lonely (46%).[14]

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[11] Danish criminal code, Articles 225 and 281.
[12] See i.a. UN Convention on the Rights of the Child, Article 19.
[13] https://sletdet.redbarnet.dk/wp-content/uploads/2024/10/Children-and-young-peoples-exposure-to-digital-violations-and-other-unpleasant-experiences-online-2024.pdf
[14] Ibid.

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Gender based violence:

Research finds that girls (55 %) are not only more negatively affected by their experiences than boys (39%), it also finds a range of gender based discrepancies in the risks of exposure to digital violations:

Extortion:
Although extortion tends to occur equally among girls and boys, threats and extortion disproportionately affect girls. Regardless of the specific negative emotions or reactions involved, a higher number of girls experience these adverse effects compared to boys.

Unwanted attention from unknown adults:
Although only slightly more girls than boys are contacted by unknown adults, girls have most often experienced that the adult wanted to talk or chat, that the adult sent them something that was unpleasant or that the adult wanted them to do something that they did not want to do (In 2024 19% of girls experienced this as opposed to 4% of boys).

Being filmed, photographed or screenshotted against their will:
In 2024 30% of girls experienced this, while the same applied to 20% of boys.

Receiving unwanted material:
Girls more often than boys experience receiving private or intimate images they do not want to see. In 2024 13% of boys experienced it, and for girls the figure was 24%.

Experiences of rumours being spread:
Girls more often than boys experience someone spreading rumours about them. In 2024 15% of girls experienced that others have spread rumours about them, while the 9% of boys experienced this.

Finally, girls are more often negatively affected by having their private or intimate photos or videos shared than boys. This is regardless of the specific negative emotions or reactions.

Question 1 B: Information about what makes the risk prominent or recurrent

When children talk about their unpleasant experiences online, they highlight a pattern in which the design and features of digital platforms either increase or decrease the risk of being exposed to unpleasant experiences and violations online.[15]

Although their form and expression may vary across different platforms the following features may increase the risk of digital violations:

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[15] Ibid.

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B1: Lack of content moderation: Without effective moderation, harmful, offensive and illegal content can be shared and remain available on the platform, increasing the risk of users being exposed to harmful, offensive and illegal content.

B2: Free access to each other's profiles: Features that allow users to freely add and contact other profiles enable users to send harmful, abusive and illegal content to strangers.

B3: The image and video-based format: The image and video-based format on many platforms amplifies the impact of harmful content, as visual media has a stronger and more immediate impact on the viewer, which can make harmful, abusive and illegal content even more disturbing and uncomfortable.

B4: Anonymity: Anonymity, such as usernames, can encourage some users to behave inappropriately or offensively as it is difficult to hold them accountable for their actions.

B5: Lack of profile validation: Platforms that do not adequately validate user profiles risk not being able to properly moderate and enforce users and content, as the infringer can create a new profile. Therefore, if platforms close profiles without thorough investigation, it can lead to real infringers simply creating new profiles and continuing their illegal activities. This also increases the risk of fake profiles and boots.

B6: Algorithmic exposure to harmful content: Algorithms that prioritise sensational or extreme content can inadvertently expose users to offensive material that they have not actively chosen to view. This is particularly pressing with platforms that utilise retention mechanisms such as infinite scrolling, where users cannot actively filter the content, they are exposed to.

B7: Features that make it easy to store and share content: Features that make it easy to share and store harmful, offensive or illegal content increase the risk of such content spreading.

B8: Temporary content: Features that allow users to post temporary content (content that disappears again) make it harder to document and report harmful, abusive and illegal content. The temporary nature of such content can encourage quick, impulsive decisions to share material without considering the long-term consequences.

B9: Use of encrypted platforms: Some large networks may operate on encrypted platforms, making it harder for authorities and platform administrators to detect and stop illegal activities such as the sharing of harmful, abusive and illegal content.

B10: Lack of age verification: Without effective age verification, minors can gain access to platforms where they may be exposed to or participate in sharing illegal content. This can include exposure to harmful or offensive material, as well as the risk of exploitation and grooming.

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B11: Inadequate reporting systems: If reporting systems on platforms are not child friendly or if they are inadequate or ineffective, children may be less likely to report illegal or infringing content. This can result in such content remaining available for a longer period.

B12: Lack of user-friendly privacy settings: Users who do not have access to user-friendly privacy settings may inadvertently share personal or sensitive information that can be exploited for illegal purposes. This includes sharing intimate or offensive material without consent.

B13: Free access to other people's profile information: Free access to other people's profile information allows users to share harmful, abusive or illegal content with other people in a person's network.

B14: Access to large groups and networks: Access to large groups and networks can facilitate illegal behaviour such as the sharing of intimate material, as they enable fast and wide distribution of the material.

B15: Auto-playing content: Features that automatically play content can expose users to harmful, offensive and illegal material without them actively choosing to view it.

B16: Lack of content warnings: Platforms that do not implement content warnings or warnings about potentially offensive material can increase the risk of users being inadvertently exposed to harmful or illegal content.

Question 1 C: Please specify whether the information you provide relates to a single Member State, to several Member States or whether it applies to the entire Union

The data applied relates to a single Member State (Denmark), however the functions listed above apply to the entire Union.

Question 1 D: Please refer to any existing documentation, research or resources that could help substantiate the evidence you provide

The information provided above is largely based on Save the Children Denmark's representative survey from 2024 of children's exposure to digital violations and unpleasant experiences online: https://sletdet.redbarnet.dk/wp-content/uploads/2024/10/Children-and-young-peoples-exposure-to-digital-violations-and-other-unpleasant-experiences-online-2024.pdf

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Question 2
The report to be published once a year by the European Board of Digital Services in cooperation with the Commission pursuant to Article 35(2) DSA should indicate best practices for mitigation measures implemented by the providers of VLOPs and VLOSEs.

Question 2 A: Please provide examples of practices addressing any systemic risks you have identified, specifying to which systemic risks such measures relate.

To accommodate the risk-promoting-features highlighted in the answer to **Question 1 B**, Save the Children Denmark recommends the following initiatives across every platform. In each initiative, we have highlighted a platform that utilises a promising practice to address the risks identified under **Question 1 B**. We refer to these practices as "better" rather than "best" practices because we currently lack the data to assess their true impact.

1. **Introduce a minimum requirement for content moderation so that harmful content and hate speech can't just flow freely on social media.** Today, there are no requirements for how many Danish-speaking content moderators the major social media platforms must have in order to remove harmful content. As a result, several of the platforms have no or very few moderators for several million users.

In parallel to the need for EU legislation requiring a minimum number of moderators on each platform, some platforms have already implemented 'safer space' practices. One example is Bluesky, a microblogging social media service where users can share short posts containing text, images, and videos. By default, the app disables pornographic, erotic, and harmful content, requiring users to actively opt in if they wish to view such material. This approach addresses some of the risks associated with exposure to inappropriate content, such as those outlined in **B1**, **B6**, and **B16**. However, this initiative currently depends on users self-declaring their content as pornographic, erotic, or harmful. As a result, content may bypass the filtering mechanism if users do not accurately label their posts.

2. **Introduce effective age verification on social media and other digital platforms with harmful content**. Today, it's all too easy to circumvent the age limit on digital media and the lack of age verification is a child safety issue.

The online gaming platform and creation system, Roblox, requires users to submit a government-issued photo ID (such as a driver's licence, passport, residency card, or any other government-issued identification document with a picture) along with a selfie to verify their age. This process strengthens the likelihood of effective age verification. The initiative further addresses concerns outlined in **B5** and **B10** by making it more difficult for minors to bypass age verification and for users to create multiple profiles.

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3. **Ban retention mechanisms, such as infinity scroll with auto-playing videos and hide reward systems for interaction and sharing that play on children's natural need for recognition**. Retention mechanisms are not only problematic because they cause children to spend more time on social media than they want to, but also because they can lead children in vulnerable positions down 'rabbit holes' of harmful content such as self-harm videos.

The Danish platform Flimmer, a social video app designed specifically for children, operates without dominant retention mechanisms such as infinite scrolling, automatic video play, and likes. Additionally, Flimmer exclusively features professionally produced video content that has been approved by human moderators. The platform uses thumbnails to give users a preview of the content before they engage with it. Furthermore, Flimmer does not allow users to send messages to each other, have personal information on their profile, or access larger groups and networks, ensuring a safer and more controlled environment for young users. By employing these features, Flimmer effectively addresses several risks, including those identified in **B1, B2, B4, B6, B8, B13, B14**, and **B15**.

Question 2 B: Please refer to any existing documentation, research or resources that could help substantiate the information on the risk mitigation practices you refer to.

Children and Young People's Exposure to Digital Violations and Other Unpleasant Experiences Online, Save the Children Denmark, Trygfonden and Epinion, September 2024, **https://sletdet.redbarnet.dk/wp-content/uploads/2024/10/Children-and-young-peoples-exposure-to-digital-violations-and-other-unpleasant-experiences-online-2024.pdf**

Should you have any questions concerning the inputs from Save the Children Denmark, please contact Mr. Tashi Andersen, senior political advisor, taan@redbarnet.dk

Yours sincerely,

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