

VSE's Submission to the EC Public Consultation on the Action Plan Against Cyberbullying

Introduction

Victim Support Europe (VSE) welcomes the European Commission's commitment to addressing the growing threat of cyberbullying through a dedicated EU Action Plan. As the leading European umbrella organisation advocating for the rights of all victims of crime, we emphasise that cyberbullying is not only a social or digital challenge, it is a **form of psychological violence** that causes real, long-lasting harm.

Cyberbullying affects children and adults alike, but particularly targets vulnerable groups—such as children, adolescents, LGBTIQ+ people, persons with disabilities, and those facing exclusion. Victims report increased anxiety, depression, loss of self-worth, and in some cases, self-harm and suicidal ideation. For these individuals, justice is not only about punishing offenders; it is about being heard, protected, supported, and given a real chance to recover.

A truly victim-centred strategy must ensure that victims' voices are heard in the design, implementation, and monitoring of the Action Plan. Survivors and young people should be directly involved in co-creating solutions, awareness campaigns, and reporting mechanisms, to guarantee that responses reflect lived realities.

Key requests and recommendations

We urge that the Action Plan be grounded in a **victim-centred, trauma-informed, and empathy-driven approach**. Every policy and measure—whether preventive, responsive, or restorative—should recognise the **dignity, agency, and lived experience** of victims and survivors. We encourage the Commission to embed the following key pillars into the Action Plan:

1. Mainstream Victims' Rights in All Cyberbullying Responses

- Ensure the Action Plan puts victims' needs, rights and voices at its core, adopting a **victim-centred and trauma-informed approach** across all phases: prevention, intervention, and recovery.
- Recognise cyberbullying as a form of **psychological violence**, with serious short- and long-term impacts, and acknowledge that victims' needs and experiences may vary widely, requiring tailored and context-sensitive responses.
- Pay attention to the risks of **secondary victimisation**, including stigma, disbelief, or institutional inaction, and include **safeguards** against these.
- Embed psychological recovery and trauma care as a core right for all victims, supported by EU funding streams for long-term mental health care.

2. Strengthen Access to Information and Victim Support Services

- Guarantee access to **inclusive, age-appropriate, user-friendly, free, confidential, and specialised support services** (psychological, legal, social) for all victims, including adults.
- Ensure minimum standards of protection and support across all EU Member States, in compliance with the Victims' Rights Directive, including access to victim support services,

information, and protection measures. Guarantee long-term funding to ensure the sustainability of these services, and their capacity to provide support tailored to the diverse needs of victims.

- Expand the **116 006** victim support helpline to cover digital harm and cyberbullying, ensuring EU-wide accessibility and child- and youth-friendly support across multiple channels.
- Fund **specialised training** for victim support professionals on cyber trauma and digital abuse.
- Enhance **individual needs assessments**, especially for victims with disabilities, language barriers, or neurodivergence, and ensure protection measures are implemented with empathy and competence.
- Allow for **remote hearings and examinations** only where strictly necessary, and ensure **post-court recovery support** for victims to rebuild self-esteem and trust.
- Establish clear **referral pathways** between schools, healthcare providers, and victim support organisations to prevent victims from being left unsupported.
- Guarantee accessibility across multiple EU languages and formats for persons with disabilities, ensuring non-discrimination and equal access.
- Develop sustainable EU funding mechanisms for national victim support organisations, avoiding reliance on short-term or pilot projects.

3. Improve Reporting and Redress Mechanisms

- Establish **accessible, child- and youth-friendly reporting tools** with clear, time-bound procedures for content removal, victim redress, referral, and follow-up, ensuring comprehensive support at all stages.
- Ensure cooperation between **platforms, law enforcement, and victim support services** for coordinated and timely responses.
- Mandate that victims receive **feedback** on their reports; not only when requested, but proactively and respectfully.
- Require platforms to apply a “victim impact lens” when assessing their systems and to publish annual reports on the effectiveness of safety and redress mechanisms.
- Set up mandatory victim consultation panels for digital platforms to ensure tools are designed with input from those directly affected.

4. Promote Education, Awareness, and Resilience

- Launch EU-wide awareness campaigns on **digital empathy, online safety, and bystander responsibility**, co-designed with children and youth.
- Equip parents with the tools and knowledge to establish **healthy digital habits**, identify early signs of cyberbullying, and support children in building **resilience**.
- Integrate **victims’ rights in digital spaces** into school curricula and teacher training.
- Promote **youth-led initiatives** that empower young people to support peers and co-create solutions.
- Provide **mandatory training** for professionals (teachers, healthcare workers, police, social workers) on recognising signs of cyberbullying and preventing secondary victimisation.
- Ensure that all training programmes also include modules on empathy, trauma-informed communication, and systemic cooperation between professionals.
- Support prevention programmes in schools, youth organisations, and online spaces, including digital literacy, empathy-building, and conflict resolution skills.
- Promote platform responsibility by ensuring that online services provide accessible reporting tools, robust safeguards, and active monitoring to prevent and address harmful content.

5. Address Underreporting and Close Data Gaps

- Collect **disaggregated data** by age, gender, sexual orientation, disability, and ethnicity—recognising how intersecting vulnerabilities may compound harm.
- Fund research into the **long-term impact** of cyberbullying and identify **effective victim support pathways**.
- Require the European Commission to establish an independent monitoring mechanism to regularly evaluate the victim-centred implementation of the Action Plan.
- Include clear monitoring tools in the action plan, with measurable indicators and accountability structures to track progress. Make sure victims and survivors are consistently consulted when policies and support systems are developed, implemented, and evaluated.

6. Ensure Strong Legal Protections

- Ensure coherence with the **Digital Services Act, AI Act, Victims' Rights Directive**, and the **CSAM Regulation**, to guarantee victims' **protection, redress, compensation**, and access to support.
- Apply the **Barnahus principles** and connect with **integrated child protection systems**.
- Develop **minimum standards** for platform accountability, including obligations for proactive moderation and transparent reporting tools.
- Provide access to **specialised legal aid** to help victims navigate complex digital abuse cases.
- Introduce restorative justice options, where appropriate and safe, giving victims the choice to seek acknowledgement, apology, or reparative measures from perpetrators, while prioritising their safety and agency.

7. Enable Cross-Border Support and Coordination

- Because online violence often crosses borders, ensure the Action Plan facilitates **cross-border victim support**, protection orders, and legal cooperation.
- Create an **EU-level coordination hub** to link national victim support services, law enforcement, and platforms.
- Promote structured cooperation with **digital service providers**—particularly in cross-border incidents—to reduce delays and ensure effective victim response.
- Expand cooperation beyond the EU, engaging with international victim support networks to ensure protection and assistance even when perpetrators or platforms are located outside the Union.

Conclusion

This Action Plan must be more than a set of guidelines. It must be a **transformative instrument of change** that recognises the **emotional, social, legal, and psychological impact of cyberbullying**, and delivers **real solutions for real people**.

Children, young people, and adults who experience cyberbullying are not just data points; they are individuals with voices, rights, and the potential to recover and thrive when given the right support. Victims are not voiceless; they are too often unheard. Let us ensure this Action Plan hears them clearly and acts meaningfully.

By embedding victims' voices through ongoing consultations, psychological recovery, accessibility, and systemic cooperation into every measure, the EU can ensure that cyberbullying responses go beyond prevention and punishment to uphold dignity, support recovery, and deliver justice, while addressing all experiences of cyberbullying fairly and effectively.

Victim Support Europe stands ready to contribute to the implementation of the Action Plan and to continue supporting efforts to build a safer, kinder, and more resilient digital future for all.

About VSE

Victim Support Europe (VSE) is the leading European umbrella organisation advocating on behalf of all victims of crime, no matter what the crime, no matter who the victim is. VSE represents around 80 member organisations, providing support to more than 2 million people affected by crime every year in 36 countries. Founded in 1990, VSE has been working for more than 30 years for a Europe, and a world, where all victims have strong victims' rights and services, whether they report the crime or not; this year we are celebrating 35 years of victim support in Europe, while we are shedding light on the ongoing challenges faced by victims across Europe. We work towards this mission through advocacy to improve European and International laws, through research and knowledge development, awareness raising activities, through capacity building at national and local level and the provision of practical tools/resources and evidence-based recommendations for all crime victims.

Annex – CRAG Joint Statement



Joint Statement: Children's rights at the heart of the upcoming Action Plan against Cyberbullying

September 2025

Introduction

In recent years, the European Union has made significant efforts to protect and promote children's rights online. These include implementing the Better Internet for Kids Strategy and recently adopting the Guidelines on the protection of minors under the Digital Services Act. However, online risks persist, and a robust, holistic and child-centered approach is needed to tackle them. OECD research has shown that the number of adolescents exposed to cyberbullying is increasing, with one in six 11- to 15-year-olds reporting experiences of cyberbullying in 2021–22.¹

Cyberbullying can take many forms, such as insults, spreading rumours, posting offensive and humiliating photos and videos, and is often more vicious because offenders can hide behind digital identities. Cyberbullying can have short- and long-term mental and physical consequences for children. These consequences can include higher levels of depression and anxiety, emotional distress, suicidal ideation and attempts, and somatic complaints, as well as poorer physical health. It has been shown that these consequences not just happen in front of the screen but have a greater impact on a child's life and well-being.² The effects of cyberbullying often extend far beyond the screen. For many children, the emotional toll is long-

¹ OECD, [How's Life for Children in the Digital Age?](#), 2025.

² See for example: Save the Children Romania, [The impact of cyberbullying on children's emotional wellbeing](#), 2025.

lasting and can contribute to social isolation, academic decline, and an increased risk of grooming, exploitation, and disappearance.³ Children experiencing such harm need to be listened to, believed, and supported with compassion and care.

The upcoming EU Action Plan against Cyberbullying is an important next step in the ongoing commitment of the European Union to uphold children's rights in the online environment by strengthening online protection, amplifying children's voices, and ensuring early, trauma-informed, and coordinated responses to harm. Signatories welcome that the Action Plan will build further on existing initiatives, like the ones mentioned in the call for evidence, and commit to providing a harmonised definition of cyberbullying at EU level. However, it is also important that the Action Plan will align and complement with other EU initiatives, such as the Gender Equality Strategy, the LGBTIQ Equality Strategy, the Strategy for the Rights of Persons with Disabilities, the Strategy on the Rights of the Child, the Victims' Rights Strategy, as well as the European Pillar of Social Rights which focuses on quality and inclusive education.

Key recommendations

Signatories welcome the approach by the European Commission, and further recommend the following:

1. Strong prevention by empowering the whole community surrounding the child

- The promotion of **digital literacy** as well as **social and emotional skills** from an early age and adapted to the different stages of the life of children is a fundamental prevention mechanism of (cyber-)bullying. Additionally, training and awareness-raising campaigns should be available for **parents, caregivers and frontline professionals** (including teachers, social workers, health staff and police) to recognise the first signs of cyberbullying. Through targeted training, these adults and peers can better **recognise early warning signs**, respond with **sensitivity**, and provide **safe spaces** for children to disclose what they are experiencing.
- The **links between offline and online bullying** should be considered to ensure effective early detection and prompt support, paying special attention to the educational and family environments of the child.
- **Civil society organisations** must be supported and adequately funded for their role in connecting children, families, schools and institutions in prevention efforts. The role of **helplines and hotlines** should be further promoted and strengthened, and their operation should be enhanced to ensure accessible, safe, and confidential avenues for children to seek help.
- **Public authorities in the education and social fields** should provide clear guidelines to education institutions (formal and non-formal) on setting up plans to address and prevent bullying, and how to work in partnership with community and (mental) health organisations.
- **Online platforms**, including gaming platforms, should invest and ensure specific safeguards to protect children from cyberbullying, including age-appropriate safety features, especially

³ Missing Children Europe, [CESAGRAM Project](#), 2024.

reporting tools, keyword blocking and content moderation technology. Special attention should be paid to how **emerging technologies** may facilitate cyberbullying, especially Artificial Intelligence and Virtual/Augmented Reality, which should be designed with child safety and privacy by default.

2. Adequate and age-appropriate reporting and redress mechanisms

- Children must have **quick, simple, anonymous and accessible ways to report cyberbullying**. Online platforms must ensure that their reporting tools are accessible, especially for children with disabilities, and age-appropriate. Victims should receive **feedback** on the outcome of their report and platforms should ensure the **prompt removal** of harmful content and conduct. A Code of Conduct for online platforms on how to implement measures to prevent and respond to cyberbullying should be considered.
- **Civil society organisations** often receive the first disclosures from victims. Their capacity to act swiftly and without barriers is essential and must be **adequately resourced**.
- **Member States** should be encouraged to promote a culture of reporting and **positive bystander behaviours** in schools, educational systems, and sports and cultural associations.
- **Member States** should be encouraged to **gather disaggregated data on cyberbullying** by age, gender, sexual orientation, disability, and ethnicity to understand who is most affected and target prevention and support measures accordingly. The data collection should also look at how these factors can overlap and create additional vulnerabilities. Evidence-based policymaking depends on understanding the **lived experiences of the most affected groups**.

3. Access to inclusive, trauma-informed and age-appropriate victim support services

- Access to **inclusive, age-appropriate, trauma-informed, user-friendly, free, confidential, sustained support services** should be available to all victims of cyberbullying. Children affected by cyberbullying, including those in residential care, require sustained support to reduce the risk of re-victimisation and further harm. This is why European and national helplines and hotlines must be recognised and securely funded to guarantee child-centred support.
- Victim support must be coordinated across **health, education, justice, and social services**, and it must take into account the needs not only of the victims but, where relevant, the young perpetrators - many of whom may also be vulnerable or victims of abuse themselves. These multidisciplinary and interagency interventions should be in line with the **Barnahus model** and prioritise the best interests of the child in every response.
- As cyberbullying crosses borders, the Action Plan must enable **cross-border victim support**, mutual recognition of protection measures and structured EU cooperation to ensure consistent, high-quality services.

Children are experts in their own lives and powerful agents of change. The meaningful and inclusive participation of children will contribute to the success of this Action Plan. Signatories therefore welcome the opportunity for children to share their insights, experiences and ideas via the EU Children's Participation Platform's online survey⁴, and call for the continuous participation of children throughout the development, implementation and evaluation of the Action Plan. Policies that affect children's lives must be created **with them, not just for them**. This participatory approach is a cornerstone of **child rights-based policymaking**.

The Action Plan should action Member States, enable civil society organisations and urge online platforms to proactively protect children from cyberbullying. As organisations representing children and working on children's rights, the signatories are ready to play an active role in the further development and implementation of the Action Plan.

This statement has been endorsed by the following individual organisations:

1. 5Rights
2. Alliance for Childhood
3. ChildFund Alliance
4. Children of Prisoners Europe (COPE)
5. Child Rights International Network (CRIN)
6. COFACE Families Europe
7. ECPAT International
8. Educo
9. Eurochild
10. Hope and Homes for Children
11. IGLYO
12. Make Mothers Matter
13. Missing Children Europe
14. Save the Children
15. Victim Support Europe

⁴ EU Children's Participation Platform, [Child-friendly survey Action Plan against cyberbullying](#), 2025.