Victim Support Europe

VSE feedback on: Child online safety – keeping digital spaces accountable and trustworthy (EU Kids Act)

Overall assessment and VSE position

The below table builds on VSE's implementation logic, responsibilities, mechanisms, resources and monitoring, and its work on integrated national victim support systems. The EU KIDS Act should connect online prevention and platform accountability with effective protection, incident response and victim support.

1. **Articles 19 and 33 – Strengthen child-friendly reporting and connect assistance channels to victim support.** Ensure simple and accessible reporting mechanisms, clear referral pathways to specialised victim support and child protection services, and especially national helplines have alternative digital communication channels, including secure online chats, messaging services and applications connected to existing national victim support systems
2. **Article 34 – Make enforcement outcome-oriented.** Integrate evidence from victims and frontline organisations into supervision and implementation, measuring whether enforcement actually improves children's safety and access to protection.
3. **Article 38 – Embed victim protection in incident response.** Include victim support organisations and relevant professionals in national and EU incident-response arrangements, with clear emergency protocols, multi-agency cooperation, information-sharing safeguards, referral and follow-up.

Victim Support Europe (VSE) welcomes the European Commission's proposal for the EU KIDS Act as an important step towards safer digital environments for children. The proposal recognises that children's online safety requires more than individual awareness or parental supervision: digital service providers must take responsibility for the risks associated with the design and operation of their services, while public authorities must ensure effective oversight and protection.

VSE particularly welcomes the recognition of national assistance channels, the role of Safer Internet Centres and the need for coordinated responses to incidents affecting children. We emphasise the need to establish an integrated response connecting reporting mechanisms with individual needs assessments, appropriate referrals and access to general and specialised victim support services. Reporting online harm should serve as an entry point to a wider protection and support system, ensuring that children receive assistance according to their individual needs and circumstances. This requires accessible reporting channels, clear responsibilities among relevant actors and effective cooperation between digital platforms, victim support organisations and child protection services.

However, **preventing online harm and making digital services safer must go hand in hand with ensuring that children who experience harm can access appropriate, specialised and sustained**

support. Reporting mechanisms, platform safeguards and regulatory enforcement are essential, but they do not replace victim support, protection, recovery and access to justice.

The EU KIDS Act should therefore be implemented as part of a wider, integrated child protection and victim support framework, connecting prevention, identification, reporting, emergency response, referral and long-term assistance.

Key recommendations

Priority 1. Ensure child-friendly reporting mechanisms and effective referral pathways to victim support services, Articles 19 and 33

VSE welcomes Articles 19 and 33 and their provisions concerning child-friendly reporting mechanisms and national assistance channels. However, reporting online harm should not be limited to flagging or removing harmful content. It should also facilitate children's access to appropriate protection and support.

Research highlights significant barriers to reporting, including complex procedures, fear of consequences, lack of trust and uncertainty about what happens following a report.[1] Reporting mechanisms should therefore be simple, accessible and age-appropriate, providing clear information about available reporting options, the steps that follow and the support children can access. Particular attention should be paid to confidentiality, children's autonomy and the prevention of secondary victimisation.

The expertise and experience of Safer Internet Centres, including their helplines and hotlines, are particularly important. However, assistance channels should not operate in isolation or create parallel support structures. Children experiencing online harm may require psychological support, specialist counselling, safety planning, legal information, protection and other forms of assistance, depending on their individual needs.

VSE recommends that:

- **Article 19** ensures simple, accessible and child-friendly reporting mechanisms, with clear procedures, timely feedback and information about available victim support services.
- Reporting mechanisms facilitate direct access and effective referrals to independent victim support organisations, specialised child protection services and other relevant professionals, according to children's individual circumstances and protection needs.

[1] Internet Matters (2025). *Understanding and Improving How Children Report Online Harm*. https://www.internetmatters.org/wp-content/uploads/2025/05/Understanding-and-improving-how-children-report-online-harm-Internet-Matters-May-2025.pdf ; Cover, R., Beckett, J., Brevini, B., Lumby, C., Simcock, R. and Thompson, J. D. (2026). *Reporting Online Abuse to Platforms: Factors, Interfaces and the Potential for Care*. *Convergence*, 32(1) https://journals.sagepub.com/doi/10.1177/13548565251324508

- Clear referral pathways enable children to access appropriate individual needs assessments by qualified professionals and receive tailored assistance, without unnecessary repetition of their experiences or additional distress.
- Article 33 ensures that national strategies formally connect Safer Internet Centres, child helplines, victim support organisations, child protection services and other relevant specialist services, supported by clear referral protocols and defined responsibilities.
- National victim support systems, including services operating through the 116 006 victim support helpline, are supported in providing alternative digital communication channels, such as secure online chats, messaging services and dedicated applications. These should enable children to contact trained professionals safely and discreetly, without relying exclusively on telephone communication.
- Children can access information, guidance and appropriate support without necessarily initiating criminal proceedings, while ensuring confidentiality, appropriate consent and data protection safeguards, and continuity of care.
- Member States build on existing national victim support infrastructure and expertise, avoiding duplication of services and ensuring adequate resources for accessible, specialised and quality support.

The general objective should be to ensure that **every reporting channel can become an entry point to appropriate protection and support.**

Priority 2. Make enforcement an integral part of implementation and accountability, Article 34

VSE considers effective enforcement essential to ensuring that the obligations established by the KIDS Act translate into safer digital environments and better protection for children.

The proposed reliance on the existing enforcement architecture under the Digital Services Act is an important starting point. However, enforcement should not be assessed solely through formal compliance or technical requirements. It should also consider whether measures actually reduce children's exposure to harm and improve their access to protection.

This connects directly to VSE's broader implementation agenda: moving from legal standards to clear responsibilities, effective mechanisms, adequate resources, monitoring and measurable outcomes.

VSE recommends that:

- Enforcement and supervision take account of evidence on children's experiences and the actual impact of online harms.
- National authorities and the Commission have appropriate expertise and capacity to assess risks to children and follow up on non-compliance.
- Victim support organisations and child-protection civil society organisations are meaningfully involved in identifying emerging risks, reporting systemic shortcomings and informing enforcement priorities.
- Cooperation between Digital Services Coordinators, national child protection authorities and other competent bodies is strengthened.

- Monitoring considers not only platform compliance but also whether children can access protection, assistance and effective remedies.

The principle should be that **enforcement must deliver measurable improvements in children's safety and protection, not simply demonstrate compliance on paper. Victim support organisations should be meaningfully involved in the design and implementation of national support strategies, implementation and enforcement cooperation and incident-response mechanisms. Their expertise should help ensure that online child safety is connected to actual protection, referral, recovery and long-term support.**

Priority 3. Make incident reaction mechanisms operational and victim-centred, Article 38

VSE welcomes Article 38 and its provisions on EU-level incident assessment, knowledge-sharing networks, rapid-response arrangements and national preparedness.

While Article 38 provides for cooperation with relevant third parties and the development of incident-response arrangements, it does not explicitly require the involvement of victim support organisations or establish detailed victim-centred response procedures. VSE therefore recommends strengthening these provisions to ensure that incident-response mechanisms address not only the containment of online threats but also the identification, protection, referral and support needs of affected children.

This is an important opportunity to strengthen cooperation between authorities and relevant third parties when incidents affect children across the EU or significant parts of it.

However, incident response should not be limited to containing a digital threat or coordinating regulatory action. It must also address the immediate and longer-term protection needs of children affected.

This is where VSE sees a strong connection with **integrated network approaches** bringing together the different professionals and institutions involved in a child's protection and support, with clear responsibilities, coordinated interventions and the child's needs at the centre.

VSE recommends that:

- National incident-response protocols identify the roles and responsibilities of relevant authorities, law enforcement, child protection services, healthcare professionals, victim support organisations, helplines and other relevant actors.
- Existing national emergency response and child protection protocols are mapped and connected to the mechanisms established under Article 38.
- Clear procedures establish when and how an incident triggers immediate safeguarding measures, risk assessment, referral and specialised support.
- Communication and information-sharing arrangements enable timely cooperation, while respecting confidentiality, data protection, necessity and proportionality.
- Professionals receive appropriate training and guidance to identify online harm, assess risks, respond to disclosures and refer children safely.

- Victim support organisations are included in preparedness planning, incident-response cooperation and follow-up. Drawing on their frontline experience, they can help identify emerging patterns of victimisation, assess the support needs of affected children, facilitate referrals to specialised services and ensure that emergency responses include appropriate protection and continued assistance.
- Children affected by large-scale incidents receive appropriate individual assessment and continued support, rather than being treated only as part of a wider technical or regulatory incident.

Incident-response arrangements should also take account of situations involving multiple victims, cross-border abuse, repeated exposure to harmful material, grooming networks and the continued circulation of abusive content. A coordinated emergency response must protect the child, not simply contain the incident.

Priority 4. Strengthen prevention and safety by design

VSE supports the emphasis on safer digital services, age-appropriate design and measures addressing unwanted contact, harmful content and potentially addictive features. Responsibility for online safety cannot be transferred to children and their parents alone. Technology companies must take responsibility for risks associated with their services and ensure that safeguards are effective in practice.

VSE recommends that:

- Children are involved meaningfully in the development and evaluation of safety measures, in age-appropriate and safe ways.
- Prevention measures address grooming, sexual exploitation, cyberbullying, coercion, harassment and other forms of online victimisation.
- Platforms provide simple, accessible and child-friendly reporting and blocking mechanisms, ensuring clear information on the reporting process, timely feedback and effective referral pathways to independent victim support and child protection services. Reporting tools should also facilitate direct access to available assistance, including through secure digital communication channels.
- Risk assessments consider the potential consequences of harmful design features for children in vulnerable situations.
- Civil society and victim support organisations contribute their practical expertise to the development and evaluation of prevention measures.

Prevention and risk reduction should address not only exposure to harmful content but also the conditions that enable perpetrators to target, manipulate and exploit children.

Priority 5. Recognise victim support organisations as essential partners

VSE emphasises that victim support organisations are not simply service providers to be consulted once harm has occurred. They are essential partners in prevention, early identification, protection, referral, recovery and policy implementation. Their frontline

experience provides valuable evidence about the forms of harm children experience, the barriers they face when seeking help and the gaps in existing protection systems.

VSE recommends that the KIDS Act explicitly recognise the contribution of victim support and child-protection organisations across its implementation framework, including:

- The design, implementation and evaluation of child-friendly reporting and support mechanisms under Article 19, drawing on victim support organisations' expertise in identifying barriers to reporting, preventing secondary victimisation, facilitating referrals and assessing individual support needs.
- National assistance strategies under Article 33.
- Cooperation, supervision and enforcement arrangements under Article 34.
- Incident preparedness, rapid-response mechanisms and protocols under Article 38.
- Training and capacity-building for professionals working with children.
- Monitoring and evaluation of the effectiveness of national measures.

Adequate and sustainable funding must accompany these responsibilities, ensuring that victim support organisations have the capacity to provide accessible, specialised and quality assistance. This should include investment in secure digital communication infrastructure, such as online chats, messaging services and applications, alongside professional training and operational capacity to ensure that children can access support through different communication channels.

Cross-cutting implementation requirements

The five priorities above should be supported by a common implementation approach:

Requirements	What is needed
Standards	Clear minimum expectations for child-friendly, age-appropriate, accessible and trauma-informed responses.
Reporting and referral	Clear, accessible and child-friendly reporting procedures, transparent follow-up, individual needs assessments and effective referral pathways to appropriate support services, including access through secure digital communication channels.
Responsibilities	Defined roles for authorities, platforms, victim support organisations and professionals.
Mechanisms	Referral pathways, information-sharing arrangements, emergency protocols and multi-agency cooperation.
Resources	Sustainable funding, generic and specialist services, professional training and operational capacity.
Monitoring	Indicators measuring actual access to protection, support and effective remedies, alongside regulatory compliance.

These requirements should also connect with the Revised Victims' Rights Directive, the revised CSA Directive and the wider EU child protection framework, avoiding fragmented or parallel systems.

Conclusion

VSE welcomes the EU KIDS Act as an opportunity to advance a more comprehensive and coordinated approach to children's online safety. However, a safe digital environment cannot be achieved through prevention, age restrictions and platform compliance alone. Children who experience online harm must be able to access protection, justice and appropriate support, regardless of where they live or the circumstances of their victimisation.

The EU should ensure that national assistance channels, regulatory enforcement and incident-response mechanisms are connected to existing child protection and victim support systems. This requires meaningful cooperation between public authorities, law enforcement, digital service providers, professionals and civil society. **Every child deserves to be safe, online and offline. And every child who experiences harm deserves to be heard, protected and supported.**

Suggested Bibliography

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About Victim Support Europe

Victim Support Europe (VSE) is the leading European umbrella organisation advocating on behalf of all victims of crime, regardless of the crime or the victim. Founded in 1990, VSE brings together victim support organisations across Europe and works to ensure that all victims have access to rights, protection and support services, whether or not they report a crime. VSE pursues this mission through advocacy to improve European and international laws, research and knowledge development, and capacity-building at national and local level.