

Shaping digital spaces, regulating platforms, and safeguarding democratic practices online – not just for young people!

Position paper by the Child and Youth Welfare Association – AGJ ¹

The AGJ advocates for a coherent and complementary regulatory framework for the digital space, as well as a transparent implementation structure, that equally empowers, involves and protects young people. European digital policy and the associated laws and initiatives provide the crucial framework for this. They must be further developed and defended at European level and consistently implemented at national level in order to create safe digital spaces and, above all, to enable democratic participation and practice within these spaces and through digital technologies.

Algorithms that are optimised for maximum dwell time and specifically promote harmful, polarising and radicalising content, as well as platform designs geared towards comparison and engagement, take a toll on the mental health of not only young people. Minimising the manifold risks inherent in or enabled by digital products and services requires political and regulatory responses. Restricting access for young people falls short. Approaches that threaten to individualise these structural problems by invoking individual competence, self-regulation and parental supervision are misdirected. Policymakers must fulfil their responsibility to ban harmful and manipulative features of platforms, ensure effective, transparent and child-friendly complaint and reporting mechanisms, and enable the consistent criminal prosecution of acts of violence and criminal offences in the digital space. Without effective regulation at this level, young people and those who support them as they grow up in a digitally transformed world – such as parents and professionals – are largely left to face systemic risks on their own.

Democracy under platform conditions

Digital platforms are increasingly shaping the conditions of democratic public life. Social media, messaging services and online comment sections have become central venues for social negotiation and are taking on functions traditionally reserved for public, democratically regulated spaces. However, platforms are privately organised infrastructures that do not operate democratically, but rather according to economic logic. The spread of disinformation, the amplification of polarising content, and the dissemination of anti-democratic and misanthropic

¹ The Child and Youth Welfare Association – AGJ is a central forum and network that unites over 100 organisations, institutions and associations in the public and independent child and youth welfare sector in Germany. Founded in 1949, the AGJ works to strengthen and coordinate child and youth welfare structures at federal level. It serves as an advocate, cross-sectoral alliance and cooperative platform for the further development of the child and youth welfare system and its services by promoting dialogue and professional development in child and youth welfare at national, European and international levels. Although it is funded by the German Federal Ministry for Education, Family Affairs, Senior Citizens, Women and Youth, the AGJ operates independently as a non-profit public interest organisation and has its own democratic structure: More information: www.agj.de. The contact person for this position paper at the AGJ is the desk officer responsible for the specialist working committee II, 'Child and Youth (Welfare) Policy in Europe': Dr. Irene Poczka (irene.poczka@agj.de).

discourse and attitudes are all facilitated by this logic. Anti-democratic tendencies therefore find favourable structural conditions on social networks.

These developments affect everyone. For young people, however, they are of particular relevance. For them, digital spaces are central venues for political information, opinion-forming and self-positioning, more so than for older generations. Gaming communities and other forums, for example, are social spaces for many young people not only for friendships and leisure activities, but spaces where political information is shared, discussions are held and personal views are formed. The dynamics by which political discourse develops in the digital space are subject to algorithmic sorting, engagement optimisation and data-driven business models. These factors have a decisive influence on what content becomes visible and how public discourse develops. As a result, these spaces differ fundamentally from (non-digital) public spaces, whose framework is shaped by public law and the public interest and, at least in democratic societies, is also subject to democratic negotiation.

Users of these spaces face risks not only from the technology itself, such as platform designs intended to be addictive and from algorithms that promote certain content and forms of violence, but also from other users. There are also individuals, mostly adults, who use technology to recruit and promote inhuman ideologies or to threaten, sexualise, humiliate or psychologically pressure people.²

The primary goal must be to prevent violence in all its forms, particularly to empower young people and enable them to participate safely. Exclusion- or restriction-based protection is not justified until all legal and technical means of minimising violence and other risks to the mental health and well-being of digital space users have been exhausted.

Moreover, this is not merely a matter of the individual health and well-being of those directly affected by violence. In many areas, digital violence, such as hate speech, cybergrooming, cyberstalking and cyberbullying leads to the exclusion and withdrawal of certain groups, influencing the quality of debates conducted in digital spaces. Violence in digital spaces restricts opportunities for social positioning and the negotiation of issues, promotes the fragmentation of spaces for social exchange, and consequently leads to a decline in trust in the functioning of democratic negotiation practices.

However, digital spaces also open up a wide range of opportunities for young people to participate democratically and shape society. They provide sources of information and spaces in which young people can educate themselves politically, discuss issues and learn to take a stand. They provide tools for organising exchanges with peers, as well as political activities and protests, and they offer low-threshold access to engagement, self-representation and the collective articulation of interests. This applies in particular to those who are affected by exclusion in analogue contexts. Furthermore, digital spaces create a public sphere for creative forms of expression, in which young people engage in creative activities and actively shape cultural discourses and developments.

Digital spaces thus have great potential both as educational spaces, places of democratic participation and empowerment, and for practices that threaten democracy and violate human dignity. The responsible political governance of these spaces is therefore of central importance. It

² Just a few examples of violence in the digital space: Cybergrooming (sexual solicitation) occurs when adults make contact with children and build trust in order to manipulate them into performing sexual acts (e.g. sending nude photos). Cyberbullying refers to the systematic insulting, threatening or humiliating of people on social media, messaging apps, forums or gaming platforms, amongst other places. Cyberstalking involves users monitoring other users by tracking their whereabouts and/or harassing them, for example, through constant messages and calls. Hate speech encompasses derogatory comments or messages that target, for example, the appearance, origin, cultural or religious affiliation of a person or group.

is therefore necessary to consider platform regulation more consistently from a democratic theory perspective as well, and not to narrow the focus to issues of child and youth media protection.

At European level, important regulatory and governance approaches have been established, including the Digital Markets Act, the Digital Services Act, the AI Act, as well as strategic initiatives and structures such as the European Strategy for a Better Internet for Kids (BIK+)³ and the Action Plan against Cyberbullying to make digital spaces safer and more democratic. In addition, the European Commission is currently working on a further legislative project, the Digital Fairness Act, which, as part of the priority “Protecting our democracy, upholding our values”, also targets the next-smallest category of digital platforms. Among other things, this legislative proposal is intended to address manipulative interface designs (“dark patterns”)⁴, misleading practices in influencer marketing, design features that encourage addiction, and unfair personalisation or pricing practices, thereby strengthening aspects of digital fairness in the digital market, particularly regarding vulnerable users and children.

These approaches combine protection issues with transparency, accountability and risk mitigation requirements, and are intended to reduce structural risks in the digital space. Further considerations are emerging in the context of the 'European Democracy Shield'⁵, for example, represent a governance approach that views digital platforms as part of democratic infrastructure rather than merely technical or commercial environments. However, there is a significant implementation deficit: European regulations and instruments are as yet insufficiently known at the level of national and local politics, as well as within the sectoral policy and practice of German child and youth welfare, and are scarcely used systematically. Furthermore, support systems for young people largely operate in ignorance of European regulatory mechanisms and, consequently, of national implementing bodies. Youth policy in Germany should address these shortcomings.

Young people in the digital space – more than just users

Young people are growing up in a world where digital spaces are an integral part of their everyday life. There, they form friendships, develop identities, seek help and support, and experience a sense of belonging, visibility and self-efficacy. Digital environments are a key spaces for socialisation, and today they play a decisive role in shaping young people’s upbringing.

In political and public debates centred on protection in the digital sphere, young people are often viewed through a narrow lens. They are frequently viewed primarily as a group in particular need of protection or solely as consumers of digital services. This is particularly evident in the debate and in decisions regarding age limits for social media. However, blanket access restrictions individualise the problem rather than focusing on the platforms as structural frameworks, enabling environments and conditions for digital violence and perpetrators of digital violence.⁶ At first glance,

³ The European Strategy for a Better Internet for Kids – BIK+, adopted on 11 May 2022, aims to better protect young people in the digital space by regulating the digital environment and to empower them through skills and participation. See: URL: <https://digital-strategy.ec.europa.eu/en/policies/strategy-better-internet-kids> (last accessed on 21 April 2026). The BIK+ strategy refers to the EU’s digital principles. See URL: <https://digital-strategy.ec.europa.eu/de/policies/digital-principles> and URL: <https://digital-strategy.ec.europa.eu/de/policies/strategy-better-internet-kids> (last accessed on 21 April 2026).

⁴ Dark patterns are manipulative design elements in websites and apps that trick users into taking unwanted actions such as making purchases or sharing data.

⁵ Further information in German on the European Democracy Shield (EDS) can be found here: URL: https://ec.europa.eu/commission/presscorner/detail/en/ip_25_2660 (last accessed on 12 May 2026).

⁶ In the US, several rulings against platform operators following civil lawsuits confirm that companies have deliberately made decisions in favour of designs that promote addiction and can be held accountable for the health consequences for users. (See URL: www.tagesschau.de/wirtschaft/unternehmen/urteil-meta-google-sucht-100.html and www.tagesschau.de/ausland/amerika/suchtpotenzial-social-media-prozess-100.html (last accessed on 20 April 2026). In Australia, where an age limit of 16 for social media has been in place since 10 December 2025, initial assessments show how little the ban has changed young people’s use of digital spaces and how little interest the platforms have in enforcing the law: See

age restrictions appear to be a simple solution to complex problems, but they do not do justice to the social realities of young people. Furthermore, they are easy to circumvent, leading to a shift towards less regulated spaces and carrying the risk of further excluding groups that are already disadvantaged. Young people in residential care, in precarious living situations or with disabilities would be particularly affected by such measures. Young people living in rural areas, who have fewer opportunities to form social contacts in person, would also be particularly disadvantaged by exclusion from digital spaces. As such, access restrictions not only exacerbate forms of social inequality but also reinforce existing barriers to young people's democratic participation.

Studies and surveys show that young people are aware of the dangers of the digital space and that, in many respects, they act more competently than older users.⁷ Young people usually have their own self-regulation strategies and actively engage with risks, including those associated with their own behaviour. Many are familiar with protective measures, reflect on problematic content and develop their own ways of dealing with it. Regardless of these considerable skills, an individualisation of existing structural problems aimed at fostering greater personal responsibility is, from the perspective of child and youth welfare services, simply unacceptable. Young people are confronted with digital violence and harmful content⁸ everywhere in online environments. These are not isolated cases, but rather part of everyday digital experience. Individualisation would mean blaming young people and their insufficient self-regulation for the psychological and health consequences of using platforms. Such a shifting of responsibility is also counterproductive, given that young people having passed the critical age limit threshold, and also regarding adult users who would still have to deal with these problems on their own.

It remains an indispensable state responsibility to protect people from harmful products and hate, incitement and violence in both the analogue and digital spheres. The UN Convention on the Rights of the Child (CRC) obliges the state to protect young people from content and influences that harm their health, development or dignity (Art. 19, Art. 34). This duty of protection is non-negotiable. The business models of digital platforms generally aim to intensify usage in order to maximise their economic returns. It is therefore in the interest of digital corporations to continually increase key metrics such as dwell time, interaction rates and reach, which form the basis for monetisation strategies such as advertising or data-driven services. Minimising these risks inherent in digital products and services requires political and regulatory responses. It is therefore problematic when policymakers, relying on the digital economy's promises of economic growth or even out of fear of political tensions in bilateral relations, fail to consistently implement necessary protective and regulatory measures, or delay or undermine them.

URL:www.deutschlandfunkkultur.de/australiens-kinder-effekte-des-social-media-verbots-100.html, www.zeit.de/2026/10/social-media-verbot-australien-kinder-teenager-instagram-tiktok?freebie=d3c3f490 (last accessed on 20 April 2026).

⁷ See 'Zwischen Bildschirmzeit und Selbstregulation - soziale Medien im Alltag von Jugendlichen, Vodafone Stiftung Deutschland', Vodafone Foundation Germany: URL:www.vodafone-stiftung.de/wp-content/uploads/2025/09/Zwischen-Bildschirmzeit-und-Selbstregulation-Jugendstudie-Vodafone-Stiftung-2025.pdf (last accessed on 21 April 2026); see 'Wenn man uns fragen würde...!' Befragung von jungen Menschen zum Thema social media-Verbot des Instituts für Sozialarbeit und Sozialpädagogik e. V.: URL:www.iss-fm.de/aktuelles/social-media-befragung-1 and https://awo.org/wp-content/uploads/Projekte-Programme/202601_Social-Media_Studienergebnisse.pdf (last accessed on 21 April 2026); see Das bidt-Digitalbarometer 2025: URL:www.bidt.digital/publikation/das-bidt-digitalbarometer-2025/ (last accessed on 21 April 2026); see Katharina Wedel, Vera Freundl, Franziska Pfaehler and Ludger Wößmann: Zwischen Likes und Lernen: Was Jugendliche und Erwachsene über Social Media denken. Ergebnisse des ifo Bildungsbarometers 2025: URL:www.ifo.de/DocDL/sd-2025-09-wedel-et-al-ifo-bildungsbarometer-2025.pdf (last accessed on 21 April 2026).

⁸ 'Harmful content' refers, for example, to violent and disturbing content, such as graphic depictions of violence in connection with accidents, war or extreme violence, or sexualised depictions and content that are deliberately made accessible to minors and which can have a traumatic effect, content that glorifies eating disorders, self-harm or suicide, or provide instructions on how to do so; dangerous challenges that incite risky behaviour; as well as disinformation and fake news.

Digital platforms and social networks are often deliberately designed to generate attention and maximise usage time. In doing so, emotionally charged, polarising or radicalising content is usually amplified, and mechanisms are promoted that are geared towards comparison, constant interaction and engagement. This has significant negative consequences for mental wellbeing, for social interactions, and also for the cultures of debate and opinion-forming processes that are vital to our democracy. The causes of this lie primarily in the business models and design decisions of major platform providers, as well as in inadequate structures for reporting and consistently prosecuting digital violence and criminal offences. At this point, politics and regulation are called upon to create effective protective mechanisms and clear boundaries for manipulative and harmful platform structures. Without such regulation, young people, as well as parents and professionals, are largely left to cope with the systemic risks of digital environments on their own.

The AGJ advocates for a political strategy at national level that supports and implements European governance approaches and legal frameworks, and which aims to actively enable and improve political participation in safe digital spaces. This includes consistent regulation of platforms that prohibits disinformation, hate speech, algorithmic amplification and design mechanisms that promote addiction, whilst ensuring the implementation of transparent, accessible and child-friendly complaint and reporting structures. In addition to social media, other areas such as gaming platforms, AI and social networks must also be taken into account. To enforce the Digital Services Act, the structure of the German Digital Services Coordinator (Federal Network Agency) must be equipped with the necessary resources and powers; furthermore, given the rapid development of the digital sphere, there must be continuous evaluation of the measures and adaptation to new developments. Existing European support instruments and support and advisory structures, as well as reporting and complaints bodies in the national context, must be expanded and made better known and more accessible to young people, child and youth welfare professionals and parents. These include, in particular, service centres, structures and instruments such as the services established under the ‘European Strategy for a Better Internet for Children – BIK+’. Central points of contact for information and advice, such as the Safer Internet Centres⁹ and specialised reporting centres, such as the German Office for the Enforcement of Children’s Rights in Digital Services (KIdD) and so-called Trusted Flaggers¹⁰, must be more visible and accessible so that together they can form a coherent system comprising prevention, advice and effective complaint handling. To build capacity, even more organisations in Germany with proven expertise in the field of child and youth welfare should be specifically certified as Trusted Flaggers and integrated into reporting structures. Only in this way can it be ensured that the interests and protection needs of young people are effectively taken into account in reporting and complaint procedures, and that competent points of contact are established for the practice of child and youth welfare. At the same time, it must be ensured that young people are systematically and effectively involved in the development, implementation and evaluation of relevant measures, procedures and structures.

Child and youth welfare: Supporting young people in a digitally transformed world – beyond media literacy

As is becoming increasingly clear, digital experiences are closely linked to issues of mental health for many people. Addictive designs, constant availability, algorithmically amplified comparison

⁹ See <https://digital-strategy.ec.europa.eu/en/policies/safer-internet-centres> (last accessed on 21 April 2026).

¹⁰ Trusted flaggers are certified organisations whose reports and complaints to platforms must be processed as a priority under the DSA.

dynamics and exposure to harmful content and digital violence lead to stress for many that cannot be managed through individual self-regulation alone. Parents, teachers and other professionals are faced with new and growing demands to strengthen young people's individual media literacy and resilience. The developments described therefore also lead to an expanded mandate for action for child and youth welfare services and for the education system as a whole. However, in view of the structural challenges, digital education must not be limited to the teaching of individual media and application skills. Nor should the issue of digital participation be viewed solely from the perspective of skills acquisition with a view to educational success and future integration into the labour market, however central these goals remain. Rather, digital participation must be understood as a public good and as infrastructure that safeguards democracy, particularly with regard to the future of democracy and as a prerequisite for democratic participation.

Article 12 of the UN Convention on the Rights of the Child guarantees young people the right to be heard in all matters affecting them. Digital policy affects young people directly, and yet they are hardly involved in relevant legislative processes, if at all, only sporadically and without transparent consequences. The aim is therefore to enable young people, as far as possible, to use digital spaces as places of democratic negotiation without fear of violence or manipulation, to critically reflect on content and to actively help shape it.

This includes, in particular, the promotion of critical thinking, democratic judgement, and a critical understanding of commercial platforms and the underlying power interests and structures, as well as the hidden and behaviour-steering design elements and functioning of digital systems, for example through mechanisms of nudging¹¹ and so-called dark patterns. The new challenges posed by artificial intelligence are also part of this. Equally crucial is knowledge of, and actual access to, alternatives in the digital space that are not guided exclusively by commercial logic. Europe and European digital policy play a key role in this regard, which must be recognised and defended.

On the one hand, child and youth services are called upon to provide individual support to young people, strengthen their decision-making skills and assist them in dealing with risks such as disinformation, hate speech or addictions. On the other hand, as a democratic actor and in accordance with the provisions of SGB VIII, it is tasked with initiating participatory processes, which means helping to shape digital public spheres and representing the interests of young people in society and vis-à-vis policymakers. This explicitly includes support for self-organisation, empowerment, digital networking and the ability to take action, particularly for young people in marginalised circumstances.

For youth work¹² to meet this challenge, fundamental structural developments are required. The funding for media education and political education programmes, which has so far often taken the form of projects and been precariously secured, does not do justice to the long-term nature and relevance of these tasks. Political education and the promotion of young people's participation in all key areas of their lives is not an optional service, but a legally mandated component of child and youth welfare enshrined in the German Book VIII of the Social Code (SGB VIII). Without appropriate framework conditions, there is a risk that structural challenges will be shifted to the individual level,

¹¹ Nudging refers to methods that influence people's behaviour through subtle changes in the decision-making environment, without imposing bans or drastically altering financial incentives. In the digital space ('digital nudging'), design elements are used to guide users towards a specific action on platforms.

¹² "The term 'youth work' stems from efforts at European level to develop a common understanding of a field of work that involves working with, for and alongside young people, whilst recognising the diversity and differences in the various organisational structures within the member states of the EU and the Council of Europe. Within the context of the German child and youth welfare system, this largely encompasses the fields of child and youth work and youth social work as defined in Sections 11–13 of Book VIII of the Social Code (SGB VIII) (own translation).: The Child and Youth Welfare Association – AGJ (2020): Die European Youth Work Agenda für qualitativ hochwertige Youth Work – in Europa und in Deutschland. Positionspapier.URL: www.agj.de/fileadmin/files/positionen/2020/European_Youth_Work_Agenda.pdf ((last accessed on 21.04.2026).

leaving professionals, parents and guardians, and above all young people, equally overwhelmed and let down.

The AGJ therefore calls for reliable, long-term funding structures and a stronger institutional foundation for youth work focused on digital environments and political education, working in closer and more cooperative collaboration with schools and other non-formal education sectors. This requires targeted training and support programmes for professionals, enabling them to meet the increased and new demands. This applies in particular to the use of new technologies, improved access to up-to-date information and practical materials. All of this also requires many professionals to rethink their attitudes towards digitalisation and digitality in everyday life.

Professionals and youth workers must acknowledge the online realities of young people and take seriously the central role that digital technology plays in their lives, recognising it as a natural part of their everyday world. Furthermore, they must be prepared to develop, maintain and protect digital spaces as arenas for political and social action. Professionals cannot be expected to always be aware of the latest TikTok trends, but there is a need for interest and a willingness to tackle the challenges of the online world together with young people, on an equal footing. Here too, professionals should know where to seek support and knowledge and be able to draw on appropriate further training and professional development opportunities. In this regard, the responsibility lies primarily with the funding bodies as employers. To promote the exchange, cooperation and dissemination of successful practices across the entire field of child and youth welfare, committed stakeholders who are open to digital technologies must also network more systematically and extensively. For although a wide variety of methods and approaches exist in the field, there remains a shortfall in their dissemination, visibility and low-threshold accessibility. Here, concepts of Open Educational Practices (OEP)¹³ offer an opportunity to make materials, methods and so-called toolboxes freely available, to develop them further and to disseminate them widely across different contexts. What is crucial here is not so much the creation of further portals as rather better communication, curated access and the active introduction of professionals to existing resources. Knowledge should be systematically shared and fed into existing structures, particularly via associations and organisations with access to large target groups. At the same time, contemporary practice requires a consistently integrated approach to online and offline spaces, as well as real-life oriented approaches that build on the experiences of young people and thereby develop acceptance and effectiveness in the first place. Media literacy centres play a crucial role in this regard.

The AGJ calls for a coherent and complementary regulatory framework for the digital space and a transparent structure and timeline of its implementation. European digital policy provides a crucial legal framework for this and should be consistently implemented at both European and national levels. Particularly with regard to young people, the significance of digitality in their everyday lives and for their democratic and social participation, empowerment and protection through regulation, must be treated as equally important guiding principles. Only in this way can it be ensured that young people can continue to shape society and politics as active participants and under safe, transparent conditions in digital spaces and using digital technologies.

From the AGJ's perspective, the governance of digital spaces involves, on the one hand, the regulation of private-sector areas, companies and markets to protect individual personal rights and guard against violence. On the other hand, it is a political regulatory task aimed at safeguarding democratic structures and individual rights to information, involvement and

¹³ OEP stands for the open use, creation and dissemination of freely accessible and free educational materials and methods.

democratic participation. It is essential to advocate across all areas of youth work and in EU-level politics to ensure that existing and proposed principles and laws regulating the digital sphere are not undermined by pressure from undemocratic political actors and private corporate interests, nor diluted by pitting different protection approaches against one another (e.g. data protection vs. child protection)¹⁴. It is equally important to ensure that they do not fall victim to the goal of global economic competitiveness for the European Economic Area.¹⁵

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¹⁴ Thus, in April 2026, following extensive discussions in the European Parliament, a politically controversial exemption regarding data protection for the detection of child sexual abuse material remained in place without a viable follow-up regulation. This created a legal loophole in which platforms are neither permitted to take consistent action against abusive content nor is a balanced, sustainable protection system in place. See: "This is sadly no April Fool's joke: Europe is switching its detection of child sexual abuse online off": URL: https://eurochild.org/uploads/2026/04/2026.04.01_Joint-Statement-on-the-end-of-EU-legal-basis-to-detect-CSA.pdf (last accessed on 21 April 2026).

¹⁵ Initiatives such as an EU Digital Omnibus could also contribute to the watering down of platform regulation if, in an effort to simplify and harmonise existing regulations, they weaken key safeguards – such as those in the Digital Services Act – extend exemptions or lower enforcement standards, thereby undermining the originally intended level of protection for users, particularly for children and young people. See www.vzbv.de/pressemitteilungen/digital-omnibus-europaeische-kommission-setzt-vertrauen-der-verbraucherinnen and see <https://mmm.verdi.de/medienpolitik-internationales/haltestelle-verpasst-107389> (last accessed on 21 April 2026).