



June 2025

Event Report

Co-creation in action

Introduction

On 23 April 2025, Mental Health Europe held its first co-creation in action event on the topic of promoting and protecting the mental health of children and young people in a digital world, with a specific focus on harmful content and addictive design.

Ensuring that children and young people thrive in a digital world is a shared responsibility; hence, co-creation¹ is of essence.

Diverse experts were invited, with the understanding that we all share the same vision: for children and young people to thrive, offline and online and for children and young people to fully enjoy their human rights in a digital environment. This event gathered stakeholders from different fields – including young people, human rights organisations, youth-led organisations, researchers, policymakers, professionals working with children and young people – in order to reflect on the needs to be addressed, explore whether the current regulatory framework is fit for purpose and identify the best ways to move forward towards a digital world that puts people and human rights at the centre, by design and by default.

At Mental Health Europe, we believe that strengthening efforts on digital literacy and providing supportive environments offline are important measures. However, such actions are not enough as they do not address the core issue, such as the way big platforms are designed and the very business model of Big Tech. A crucial step forward is implementing human rights by default and by design. It is crucial for regulators to enact and enforce policies addressing the design features and the power imbalance. Online platforms need to act and be held accountable if they do not.

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¹ Definition of co-creation by MHE

Setting the scene: The issues at stake

The discussion was opened by Lauren Armistead, Deputy Programme Director, Amnesty Tech, who focused on the human rights implications of digital platform design and its impact on the mental health of children and young people. She emphasised that current digital environments are often structurally harmful by design, driven by business models that prioritise engagement and profit over well-being. Examples she shared included auto play, infinite scroll and deciphering mood, which can lead to children with mental health problems being stuck into the 'rabbit hole'. These models exploit personal data and deploy algorithmic systems to show users content that keeps them engaged on the platform for as long as possible, but which can also intensify mental distress, particularly among young people.

Lauren conveyed that the burden of navigating these harmful systems is unfairly placed on children, parents, and teachers. Instead, responsibility must lie with governments and companies to ensure digital environments uphold human rights. She advocated for the design of platforms that are safe by default, calling for legal and policy frameworks that enforce meaningful accountability and transparency from tech companies.

She welcomed the Digital Services Act (DSA) as a step forward but called for stronger implementation to ensure that companies genuinely assess and mitigate risks to users' rights and mental health. Finally, Lauren highlighted the need to elevate youth voices in shaping the digital world, asserting that young people must be recognised not only as users but as rights-holders with a say in the systems that profoundly affect their lives.

Are current EU policies and legislation fit for purpose?

Policymakers and EU officials explored how current digital and mental health-related frameworks address the well-being of children and adolescents in the digital age. Speakers from the European Parliament and European Commission outlined existing legislative tools, such as the Digital Services Act, and ongoing initiatives to create safer online environments. The discussion focused on identifying remaining policy gaps, assessing enforcement challenges, and gathering insights from stakeholders on how EU-level strategies can better protect young people's mental health in an increasingly digital world.

Speakers

MEP Veronika Ostrihonova (Renew, Slovakia)

Members of the European Parliament Veronika Ostrihonova noted, as a member of the European Parliament's SANT and as a mother of two, highlighted the urgent need for a consistent, collective approach to address the growing mental health crisis among children and young people in the digital age. She stressed that the digital environment is currently saturated with harmful content, including up to 10,000 advertisements per day that promote unrealistic beauty standards and unhealthy lifestyles. She shared that alarming statistics show 70% of girls aged 12 to 19 believe social media negatively affects their mental health, and a similar percentage of teenagers check their phones at least once per hour.

Veronika warned of the manipulative nature of algorithms that promote endless scrolling, regardless of the psychological cost, not only for children but for all users. She noted that adults often lack the digital awareness they expect from children and emphasised the need for empowerment alongside protection. She welcomed the <u>Digital Services Act (DSA)</u> as a positive step forward but underscored the importance of effective enforcement. Upcoming reports in IMCO and CULT, along with the proposed Digital Fairness Act, aim to tackle algorithmic practices impacting minors. She concluded by calling for collaboration and the need for policymakers to strengthen legislation and civil society to advance digital literacy.

Marianne Takki, Acting Head of Unit, Disease Prevention and Health Promotion (SANTE.B.4), DG SANTE

Marianne explained that while digital tools and social media can foster creativity and peer connection among young people, excessive use can also contribute to and exacerbate mental health issues. Acknowledging the widespread overuse of social media by children, she stressed the need for a comprehensive and coordinated response across the EU.

She outlined the European Commission's commitment to mental health through its first-ever <u>communication on a comprehensive approach to mental health</u>, supported by EU funding. Actions under this approach are either already

implemented or nearing completion. Notably, the EU is collaborating closely with DG Connect on a forthcoming EU-wide enquiry on the impact of social media on mental health. Key ongoing initiatives include a UNICEF prevention toolkit offering practical tools on promoting children's physical and mental health, the <u>Technical Support Instrument (TSI) project</u>, which co-creates innovative digital solutions with young people, and a €11 million funding partnership with WHO.

Additionally, the "Implemental" joint action has supported vulnerable groups with €6 million in funding, while the EU Best Practice Portal provides a centralised hub for mental health resources. Marianne also highlighted the active role of the current EU Presidency, with informal EPSCO meetings in Warsaw contributing to new Council Conclusions. She concluded by calling on stakeholders to act as vital connectors and advocates, sharing knowledge and feedback to shape inclusive, responsive mental health policies.

Andrea Tognoni, Case Handler, Protection of Minors Online, DG CONNECT

Andrea presented the European Commission's ongoing efforts to create a safer and healthier digital environment for children through the <u>Better Internet for Kids strategy (BIK+)</u> and the implementation of the Digital Services Act (DSA). He highlighted the importance of the Safer Internet Centres and several initiatives under the BIK+, such as <u>the publication of a child-friendly version of the DSA</u>, which is available in all EU languages as well as Ukrainian, and is aimed at promoting awareness and safeguarding minors' mental health and rights online.

He explained that the DSA introduces an obligation for all platforms accessible to minors to ensure high levels of privacy and security for minors, as well as specific requirements for very large online platforms to identify and mitigate systemic risks to children's rights and mental health and well-being. The DSA also explicitly prohibits dark patterns and provides several other obligations that are relevant to minors, such as making terms and conditions understandable to children. Moreover, large online platforms also face additional obligations, notably in terms of auditing and transparency. Andrea noted that enforcement is underway at full speed, with investigations launched against several platforms, including TikTok, which, following one of the enforcement actions, has committed not to launch the Lite reward system in Europe.

Upcoming initiatives include <u>guidelines on Article 28 of the DSA</u>, an action plan on cyberbullying, an EU-wide inquiry on the impact of social media on health and wellbeing, and the development of a privacy-preserving white-label age verification app that Member States will be able to localise. Lastly, Andrea stressed the importance of the upcoming guidelines to favour a consistent application of the DSA across the EU, in line with a child-rights-based approach.

Insights from civil society

One session invited voices from civil society, children's rights advocates, consumer organisations, and public health experts to share insights on the complex relationship between digital environments and young people's mental health. The session aimed to identify systemic risks, spotlight emerging trends, and explore how policies can more effectively reflect the realities of children and adolescents.

Hugh Reilly, Advocacy and Communication Manager, UNICEF's EU Office in Brussels

Hugh addressed the complex relationship between the rise in mental health issues among young people and the growing influence of digital technologies and social media across the European Union. While recent evidence shows a strong correlation between increased online activity and mental health challenges, he commented that correlation does not imply causation. Other overlapping factors, such as academic pressure, the COVID-19 pandemic, and global conflicts, also contribute significantly to young people's well-being.

He acknowledged the dual nature of digital experiences, particularly that while they can present risks like cyberbullying, exposure to unrealistic beauty standards, and manipulative content, they also offer opportunities for learning, connection, and accessing mental health support.

Hugh highlighted upcoming UNICEF initiatives, including a June study on cyberbullying and a policy brief exploring the complex interplay between adolescents' online and offline lives in Europe. He also shared an ongoing UNICEF project focused on disrupting online harms by better understanding the role of digital technologies in shaping youth experiences.

From a public health perspective, Hugh called for a balanced approach that supports young people's desire to stay connected while strengthening digital literacy. He emphasised the shared responsibility of adults and institutions to actively protect children in the evolving digital landscape.

Fabiola Bas Palomares, Lead Policy & Advocacy Officer - Online safety, Eurochild

Fabiola underlined the critical importance of childhood as a formative period, where the development of emotional, social, and cognitive skills shapes both short-and long-term well-being. She cautioned that online environments could exacerbate existing risks and introduce new forms of harm, making it essential to better understand the complex interplay between online and offline experiences.

Referencing a recent Eurochild survey #EuropeKidsWant: Our Rights. Our Future. The Europe We Want, conducted ahead of the EU elections, Fabiola noted that children identified online harassment, cyberbullying, addiction, social exclusion, and connectivity as key concerns. An upcoming Eurochild report will further

explore children's perspectives, particularly the impact of unrealistic and harmful comparisons fostered by social media.

Fabiola stressed that children are not a monolithic group, noting the specific experiences of vulnerable children, such as those who identify as LGBTQI+. For many of these children, online platforms can serve as vital lifelines for connection and support. She recognised that children themselves have called for a nuanced understanding of the digital space and acknowledge both its risks and benefits.

She also identified persistent gaps in mental health access and the need for better training for professionals to address the online-offline dimensions of children's mental well-being. Fabiola concluded with a call to recognise the nonlinear, complex relationship between digital engagement and children's overall mental health, where mental health outcomes heavily depend on usage patterns and the user's pre-existing vulnerabilities or mental health conditions.

Urs Buscke, Senior Legal Officer, BEUC

Urs conveyed the importance of recognising children not only as individuals with rights but also as young consumers, whose economic interests, privacy, data protection, and physical safety must be safeguarded in the digital environment. He echoed the urgent need to address the impact of addictive platform design on children's mental health, which is often driven by the business models of big tech companies. While acknowledging the potential of the Digital Services Act (DSA), Urs pointed out that only Article 28 of the DSA explicitly addresses children. He called for concrete, practical guidelines to bring this provision to life, but cautioned that such guidelines are nonbinding and therefore limited in their effectiveness.

Regarding the topic of age verification, Urs recognised its necessity but expressed concern about the reliability and cybersecurity risks of current tools, noting that they can often be bypassed. He also challenged the notion that vulnerability ends at age 18, arguing that protections should extend beyond this arbitrary threshold.

Pointing out to the limited scope of the DSA, Urs emphasised the need to update EU consumer law via the upcoming Digital Fairness Act to provide a comprehensive and robust safety net, not just for children but for all users in the digital space.

Co-creating ways forward

The last presentation aimed to investigate possible ways forward, concrete actions that each stakeholder can put in place to ensure that children and young people can thrive in a digital world.

Aisha Alameen Betro, founding member for Ctrl+Alt+Reclaim

Aisha offered a gripping, personal reflection on the daily realities of navigating the digital world as a young person. She described the tension between needing social media for connection and work, while also grappling with its negative impact on mental health. During the COVID-19 pandemic, after briefly deleting Instagram, she felt compelled to return, only to acutely experience its harmful effects. In college, she observed how pervasive phone use created disconnection among peers, even sharing how one friend had to hand over her phone to someone else just to regain control.

As a coping mechanism, Aisha now practices mindful habits like placing her phone face down to avoid constant notifications. She highlighted how growing up with big tech has affected her generation's attention span and fostered a sense of powerlessness. As a communications professional, she feels the addictive pull of metrics and performance feedback from social media in real time.

Aisha concluded with a passionate call for systemic change: strong, enforceable laws, digital spaces that serve users rather than platforms, and true co-creation that includes young people. She joined a youth retreat last year aimed at challenging big tech, declaring that young people are ready to reclaim the digital world and fight for healthier online environments.

Conclusions

The final session of the event focused on identifying concrete actions that stakeholders can take to ensure children and young people thrive in a digital world. Through a collaborative workshop, participants explored key questions: What are the most pressing needs? What existing EU legislation and policies address these? Where are the gaps, and how can they be filled? Most importantly, what role can each stakeholder play in promoting better mental health? Mental Health Europe used the outcomes of this session to develop targeted recommendations for the upcoming Council Conclusions on protecting the mental health of children and adolescents in the digital era.

The digital environment, by its design and impact, affects all aspects of young lives — and as such, only a shared responsibility and united response can ensure systems that protect, empower and promote well-being. This event pinpointed that we must move beyond fragmented approaches and individual responsibility. Real change requires strong, enforceable legislation, bold regulation of platform design, and ongoing inclusion of youth voices. Key takeaways from the event include:

- 1. Systemic change is critical: Responsibility must shift from individuals to governments and tech companies through enforceable laws that ensure platforms are safe by design.
- 2. Children and young people are rights-holders: Their lived experience, insights, and voices are crucial in shaping policies and solutions that work.
- 3. Digital literacy alone is not enough: Empowering users must be matched by regulating exploitative design and business models.
- 4. Co-creation bridges sectors and gaps: Stakeholders should collaborate through a co-creation approach (including with young people) to identify blind spots, co-develop solutions, and strengthen implementation of existing frameworks.
- 5. Mental health must be a cross-sectoral priority: Digital policy, child protection, consumer rights, and public health all intersect and must act together to safeguard young people's well-being.

Annex

Recommendations for co-creating good mental health for children and young people in a digital world²

Following discussions to investigate possible ways forward, concrete actions that each stakeholder can put in place to ensure that children and young people can thrive in a digital world, participants formulated several recommendations. Recognising the growing body of evidence linking digital environments to mental health risks for children and adolescents and drawing from direct contributions from stakeholders, including youth, educators, health professionals, and civil society, these recommendations call for bold, coordinated action across all sectors to build safe, inclusive, and rights-respecting digital ecosystems. Notably that key stakeholders must collaborate to move beyond fragmented efforts and rhetoric. A dedicated European Mental Health Strategy with a strong digital wellbeing pillar, anchored in youth co-creation, psychosocial care, and human rights, is urgently needed. This must be accompanied by a shared monitoring framework, equitable funding, and ethical innovation to ensure every child in Europe can grow up in a safe, healthy digital world. See below for more recommendations.

Strengthen enforcement and close implementation gaps

While frameworks like the Digital Services Act (DSA) offer a legal foundation to protect children online, participants voiced concern that implementation remains weak and fragmented. There must be:

- Clear, accessible enforcement mechanisms at both national and EU levels, where individuals can report harm or breaches and receive meaningful redress.
- Stronger oversight bodies with the mandate and resources to ensure companies meet their obligations under the DSA and related regulations.
- A unified European-level coordination mechanism to fill gaps between national efforts, ensuring consistency in monitoring and enforcement.

Advance innovation and platform accountability in line with a human-rights-based approach

Participants highlighted the need for proactive, socially responsible product design rather not reactive fixes. Platforms must:

² Please note that these recommendations were compiled following interactive discussions with participants, after the speakers representing the respective EU institutions left the room.

- Conduct and publish independent impact assessments of their design features (e.g. infinite scroll, autoplay, recommendation algorithms) on child wellbeing.
- Be held accountable for design choices that knowingly contribute to addictive behaviour, as illustrated by legal actions such as those brought against Meta.³
- Fund the prevention and mitigation of harm, mirroring approaches used in other regulated industries (e.g., tobacco), under the principle of "you break it, you pay for it".

Improve digital education through a psychosocial and cross-sectoral lens

Education systems are vital for prevention, although they cannot bear the burden alone. Recommendations include:

- Introduce digital and emotional literacy into national curricula, not just for students but for all stakeholders such as including parents, caregivers and spaces where young people engage in (third spaces).
- Ensure professional delivery of sensitive topics related to digital risks. Teachers can facilitate discussions, but should be supported by trained mental health and digital safety experts.
- Adopt a psychosocial approach to digital wellbeing, while integrating emotional and social factors into policy and practice.

Equip and empower families and communities

Participants emphasised that parents and caregivers often lack the knowledge or tools to protect their children online. Recommendations include:

- Develop unified, EU-wide parental control tools with user-friendly features, such as time management, content filters, and emergency response buttons ("alarm" functions).
- Empower and guide parents and communities to contribute to digital policy discussions, including through local forums and national consultations.
- Provide free, accessible resources and training for families on digital wellbeing, misinformation, and media literacy.

³ European Commission, *Commission opens formal proceedings against Meta under the Digital Services Act related to the protection of minors on Facebook and Instagram*, available at: https://ec.europa.eu/commission/presscorner/detail/en/ip 24 2664

Invest in data, research, and long-term monitoring

A recurring concern was the lack of unified, scientific data to track the scale of harm or progress toward safer digital environments. All stakeholders should:

- Establish an EU-wide data monitoring framework that links digital engagement with mental and physical health indicators.
- Fund interdisciplinary research into long-term impacts of digital exposure, including psychosocial and chronic health outcomes.
- Support open access to research and collaboration with whistleblowers, researchers, and civil society to bridge the knowledge gap.