

*The Standing Committee of European Doctors (CPME) represents national medical associations across Europe. We are committed to contributing the medical profession's point of view to EU and European policy-making through pro-active cooperation on a wide range of health and healthcare related issues.*

## **Response to Call for Evidence on Action plan on the protection of children against crime**

Children across the EU face a serious risk of falling victim to crime or being recruited into crime, online and offline.

The scale, severity and long-term consequences of these harms indicate that this is not only a safety and security issue, but a growing public health problem. Exposure to online exploitation, violence and harmful content is associated with lasting mental health impacts, including trauma, anxiety, depression, self-harm, and increased risk of premature mortality. As such, protecting children from crime in digital environments must be recognised as a core public health priority.

Article 28 of the Digital Services Act requires providers of online platforms accessible to minors to take measures to ensure a high level of privacy, safety, and security for those minors. However, European doctors are increasingly concerned that online platforms are failing to protect children sufficiently and that more robust regulation is required.<sup>1</sup>

CPME welcomes the initiative to develop a European Action Plan to better protect children against crime in the physical and digital worlds. European doctors have increasingly highlighted the harms that young people are being exposed to online and draw your attention to the following reports:

- **CSAM – Child Sexual Abuse Material**

INHOPE,<sup>2</sup> a global network of 57 Hotlines across 52 countries working to eliminate CSAM (Child Sexual Abuse Material) from the internet reported a dramatic increase in reports of CSAM material in 2025:

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<sup>1</sup> [CPME Response to the European Commission Public Consultation on the Evaluation and Update of the Audiovisual Media Services Directive \(AVMSD\)](https://www.cpme.eu/api/documents/adopted/2026/04/cpme_ad_16042026_064.final.consultation.response.on.avmsd.pdf), April 2026, <https://www.cpme.eu/api/documents/adopted/2026/04/cpme\_ad\_16042026\_064.final.consultation.response.on.avmsd.pdf>, accessed 29 June 2026.

<sup>2</sup> [INHOPE Annual Report 2025](https://inhope.org/annual-report/2025#2025-emerging-trends), published March 2026, <https://inhope.org/annual-report/2025#2025-emerging-trends>, accessed 29 June 2026.

- Over 4.7m suspected online records of CSAM were identified and exchanged through INHOPE hotlines, more than 5.5 times increase compared to 2024.
- An alarming trend is the increase in illegal records, which saw 5.38 times increase, from 737.780 records in 2024 to 3.235.179 in 2025. This represents 67% of all exchanged records in 2025.
- INHOPE traced suspected online records of CSAM to 84 countries with the Netherlands, Romania, and the United States remaining the top hosting countries for confirmed CSAM.
- Pre-pubescent victims (ages 3 to 13) continued to make up the vast majority (91%) of CSAM cases.
- Female victims accounted for 98% of reported CSAM cases in 2025.

Most Hotlines have also reported a notable growth in cases linked to exploitation, sextortion, AI generated images as well as more sophisticated distribution tactics designed to evade detection.

- **Online Sexual Exploitation and Sextortion**

The most recent report from Childlight, the Global Child Safety Institute, estimates that:

- 27% of children are subjected to online solicitation, with around 7% facing this in the past year alone. Online solicitation includes a range of unwanted or pressured sexual interactions, from casual sexual inquiries via mobile phone or the internet, to long-lasting sexual conversations that can lead to the exchange of sexual texts/pictures/videos or exposure of intimate body parts.
- Nearly one in ten can expect to face sexual extortion before turning 18. [Sextortion is a form of blackmail in which sexual images (often AI-generated) are used to extort money or further sexual images or sexual activity.]

Childlight highlights the public health harms from childhood abuse, including trauma, anxiety, depression, and self-harm that can last long into adulthood as well as contributing to lifelong ill health and premature death.

- **Exposure to Pornography and Sexual Violence**

Despite requirements to protect children from harmful content, surveys show high rates of exposure to violent pornography among adolescents online.

- A cross-sectional school-based survey of 10,930 adolescents aged 14–17 years old was carried out across six European countries (Greece, Spain, Poland, Romania, the

Netherlands, and Iceland). The prevalence of any online exposure to pornography was 59% overall (and as high as 67.3% in Poland) and 24% for exposure at least once a week.<sup>3</sup>

- Similar levels have been recorded in the UK, with 51% of 11 to 13-year-olds reporting that they had seen pornography at some point, rising to 66% of 14-to 15-year-olds, with some viewing as young as age 7.<sup>4</sup>

Reports have highlighted the relationship between the normalisation of violent pornography and sexual violence against women and girls. The Sexual Exploitation Research and Policy Institute in Ireland highlights how pornography plays a significant role in shaping the sexual scripts of young people, encouraging young people to perpetuate or submit to sexual violence.<sup>5</sup> A report from UNICEF has highlighted how exposure to pornographic content at a young age can lead to poor mental health, sexism, objectification, sexual violence, and other negative outcomes.<sup>6</sup>

- **Exposure to Online violence**

The Youth Endowment Fund (YEF)<sup>7</sup> commissioned a survey of 10,000 children aged 13 to 17 years old in England and Wales revealed that 70% of teenage children have encountered real-life violent content online in the past year, with 25% saying that they found it because social media platforms promoted it to them.

TikTok is the platform where teenage children are most likely to encounter real-life violent content, with 30% of 13 to 17-year-olds TikTok users reporting exposure to violence on the platform. Although less commonly used by teenagers, X ranks second after TikTok in terms of the proportion of its users exposed to real-life violence, with 43% of those users reporting seeing violent content in the past 12 months. Facebook (33%), Snapchat (32%), and Instagram (31%) also have significant numbers of teenage users exposed to violent content.

In addition, the research found that 16% of children aged between 13 and 17 years old reported perpetrating a violent incident in the past 12 months. Of these, nearly two-thirds (64%) said that social media played a role, including online arguments leading to in-person violence, comments exacerbating conflicts, and children saying things online that they would not say face-to-face.

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<sup>3</sup> Andrie EK, Sakou II, Tzavela EC, Richardson C, Tsitsika AK. [Adolescents' Online Pornography Exposure and Its Relationship to Sociodemographic and Psychopathological Correlates: A Cross-Sectional Study in Six European Countries](#). *Children* (Basel). 2021 Oct 16;8(10):925. doi: 10.3390/children8100925. PMID: 34682190; PMCID: PMC8534324.

<sup>4</sup> Children's Commissioner [Evidence on pornography's influence on harmful sexual behaviour among children](#), May 2023, <<https://www.childrenscommissioner.gov.uk/resource/pornography-and-harmful-sexual-behaviour/>>, accessed 29 June 2026.

<sup>5</sup> Breslin R & O'Connor M. [Facing Reality: Addressing the role of pornography in the pandemic of violence against women and girls](#) SERP 2024, <[https://serp.ie/wp-content/uploads/2024/10/WA\\_SERP\\_Report\\_FINAL.pdf](https://serp.ie/wp-content/uploads/2024/10/WA_SERP_Report_FINAL.pdf)>, accessed 29 June 2026.

<sup>6</sup> UNICEF [Adolescence in Europe: The complex relationship between harmful online content and children's experiences of violence](#), Policy Brief May 2025, <<https://www.unicef.org/serbia/media/29821/file/Adolescence%20in%20Europe%20Policy%20Brief.pdf>>, accessed 29 June 2026.

<sup>7</sup> Youth Endowment Fund, [Children, violence and vulnerability 2024](#), The third annual Youth Endowment Fund report into young people's experiences of violence, <<https://youthendowmentfund.org.uk/reports/children-violence-and-vulnerability-2024/>>, accessed 29 June 2026.

- **Recruitment of Minors into Crime**

A recent Europol intelligence notification highlighted the growing recruitment and exploitation of minors (typically aged 13–17 years) through social media by criminal networks across Europe. Europol reports that minors are now implicated in over 70% of criminal networks, including those involved in cybercrime, fraud, drug trafficking, migrant smuggling, and property crime. The report highlights the glamorisation of crime through social media and the use of targeted language, coded messaging, and "gamification" strategies to recruit young people into crime.

The Irish Police Force, An Garda Síochána,<sup>8</sup> has highlighted how influencers are increasingly pushing young people into crime, violence, and abuse. In the US, the role of social media in facilitating recruitment to criminal activity has increasingly come under the spotlight. For example, numerous lawsuits across the United States have been taken against Snapchat for its addictive design and facilitation of criminal activity, including child exploitation and illegal drug distribution and sales.<sup>9</sup>

- **Gambling and Gaming**

Laws in relation to gambling vary across Europe; however, typically, access to gambling platforms is restricted for minors.

A recent report from ESPAD shows that gambling remains common among European adolescents, with:

- 23% having gambled in the past year, and boys are more engaged than girls (29% vs 16%).
- Italy stands out with the highest prevalence (45%), followed by Iceland (41%) and Greece (36%).
- Problem gambling affects 8.5% of student gamblers, up from 4.7% in 2019, with a sharper increase among girls.<sup>10</sup>

CPME has highlighted the harms from gambling and gaming disorders, including financial stress, relationship breakdown, family violence, stress, mental illness, and suicide.<sup>11</sup> Children and young people are routinely exposed to gambling product advertising and industry messaging and sponsorship, particularly online. Of particular concern is the exposure to gambling and gaming

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<sup>8</sup> An Garda Síochána, [Social Media Use Safety Guide](https://www.garda.ie/en/about-us/organised-serious-crime/garda-national-cyber-crime-bureau-gnccb-/social-media-user-safety-guide.pdf), January 2026, <<https://www.garda.ie/en/about-us/organised-serious-crime/garda-national-cyber-crime-bureau-gnccb-/social-media-user-safety-guide.pdf>>, accessed 29 June 2026.

<sup>9</sup> LAPP – Legislative Analysis and Public Policy Association, [Online Drug markets and Lawsuits Against SNAPCHAT](https://legislativeanalysis.org/wp-content/uploads/2025/07/Snapchat-Fact-Sheet-Final.pdf), July 2025, <<https://legislativeanalysis.org/wp-content/uploads/2025/07/Snapchat-Fact-Sheet-Final.pdf>>, accessed 29 June 2026.

<sup>10</sup> ESPAD Group (2025), [ESPAD Report 2024: Results from the European School Survey Project on Alcohol and Other Drugs](https://www.espad.org/sites/default/files/espada-report-2024-TDO125014ENN.pdf), EUDA Joint Publications, Publications Office of the European Union, Luxembourg, <<https://www.espad.org/sites/default/files/espada-report-2024-TDO125014ENN.pdf>>, accessed 29 June 2026.

<sup>11</sup> [CPME Policy on Gambling and Gaming](https://www.cpme.eu/api/documents/adopted/2026/03/cpme_ad_21032026_069(2025).final.policy.gambling.gaming.pdf), March 2026, <[https://www.cpme.eu/api/documents/adopted/2026/03/cpme\\_ad\\_21032026\\_069\(2025\).final.policy.gambling.gaming.pdf](https://www.cpme.eu/api/documents/adopted/2026/03/cpme_ad_21032026_069(2025).final.policy.gambling.gaming.pdf)>, accessed 29 June 2026.

through sports betting, loot boxes in video games, and other reward systems that blur the line between playing and paying.

Of further concern is the use of gaming platforms for children and exposure to predators and harmful pornographic and violent content. Earlier this year, the Netherlands Authority for Consumers and Markets (*Autoriteit Consument en Markt* – ACM) launched an investigation into Roblox (which has 150 million daily active users globally, most of whom are children) in relation to possible risks faced by minors, including exposure to illegal or harmful content, grooming, and unfair commercial practices.<sup>12</sup>

CPME invites consideration of the evidence and encourages reflection on the above, in recognition of the public health dimension.

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<sup>12</sup> European Audio-Visual Observatory [the Netherlands Authority for Consumers and Markets launches an investigation into Roblox, under the Digital Services Act](https://merlin.obs.coe.int/download/10479/pdf), IRIS 2026-3:1/24, <<https://merlin.obs.coe.int/download/10479/pdf>>, accessed 29 June 2026.