

LLL Reaction

Expanding the scope of the Action Plan beyond school walls

Background

With the capillary diffusion of the internet into our societies come challenges and risks, including misbehave, harassment and cyberbullying. [The latest data](#) from 2018 to 2022 show a concerning increase in cyberbullying in Europe, with boys engaging in cyberbullying rising from 11% to 14% and girls' incidence of engagement from 7% to 9%. Similarly, reports of being cyberbullied have escalated from 12% to 15% for boys and from 13% to 16% for girls. This affects all children as [97% of children in the EU used the internet daily](#) in 2024. As announced in [President von der Leyen's political guidelines 2024-2029](#), and as a response to this growing concern, the European Commission has now adopted an [Action Plan against Cyberbullying](#). This initiative aims to give children, teachers, parents, carers and all educators the tools they need to report and combat cyberbullying. The Lifelong Learning Platform welcomes such a timely initiative, which prompts us to rethink the way we interact on the internet - with people at the centre.

Framing cyberbullying: beyond school settings and school-aged children

The European Commission refers to cyberbullying as the “behaviour carried out through digital technologies, with the primary intention or effect of repeatedly or continuously humiliating, socially excluding, abusing, harassing or harming in particular children or young people”. This definition is fairly comprehensive to the case in point, but fails to address the cyberbullying that takes place onto other age groups. While children are particularly exposed to cyberbullying, the lack of tools to address it and the lack of control, **this phenomenon affects more than just kids**. In a 2020 study, it was found that [44 percent of all internet users](#) experienced harassment online, which can be considered a type of cyberbullying. LLLP holds it important to expand the definition of cyberbullying beyond school-aged children. This is important to combat all cyberbullying, including the one addressed to children, because as they witness harassment targeted at adults, children might infer the normality of such attacks. The growing phenomenon of cyberbullying impacts more than just young people, and equipping all citizens with the right tools to halt the spread of cyberbullying can reverberate positively across all ages.

Equally important is to **expand its scope beyond bullying or harassment and qualify it as hate crime**; most cyberbullying is motivated by bias, prejudice, or hostility against a victim's actual or perceived protected characteristic. This is important because while cyberbullying happens more frequently through text (emails, posts, DMs, etc), it can also take place through visual or audiovisual media (images, videos, etc) which might expose the victim to embarrassment in their community. By treating cyberbullying as a

hate crime, the fight against privacy infringements that often go with it would also be significantly strengthened.

We welcome the multifold suggestions that tie the combat against cyberbullying to informal and non-formal learning environments: as research shows, moving away from formal settings can enhance ownership of subjects and engage harder-to-reach target groups. The LLLPlatform has been pushing for **whole-community approaches to inclusive education practices**, and the fight against cyberbullying is one of those areas where [Community Lifelong Learning Centres](#) (CLLCs) could contribute the most. The fact of the matter is that cyberbullying is ubiquitous and does not stop outside of a classroom or once children grow up to be adults. In fact, from a lifelong perspective, tackling similar issues requires multidisciplinary teams and a whole community approach. CLLCs offer informal, welcoming, non-threatening and safer environments, often supported by psychologists or social workers and centred around the learner's needs - needs that go beyond curricula. To be effective, CLLCs should be located at the heart of the community and have flexible and extended opening hours; they should collect and analyse the services that the community seeks and needs, and integrate multidisciplinary teams and services at the local level. CLLCs allow for a more efficient engagement with marginalised groups minimising the current fragmentation of services provided by different agencies, professionals, and education and training providers. Here, parents, educators, social workers, school staff, local authorities and all other relevant actors work towards the same goal, all work towards the same goal.

Parents shall be a particularly important target group here. They can access resources and tools to effectively combat cyberbullying (in their homes, but not only) and they should also act as amplifiers, effectively leveraging the existing networks and creating additional ones if they serve our shared purpose. Importantly, community control mechanisms should be foreseen to prevent them from either falling victims to or becoming perpetrators of cyberbullying.

The importance of trans-sectoral cooperation in tackling cyberbullying becomes apparent. As such, the **active and meaningful involvement of all stakeholders shall become a priority** too. Involving school and school heads, parents, psychologists and social workers, civil society organisations, social partners, and local authorities is quintessential to the positive outcomes of this fight.

Empowering learners: promoting wellbeing and developing socio-emotional competences

Longitudinal research on the long-term impact of bullying and cyberbullying is scarce compared to the widespread nature of the phenomenon. Nevertheless, judging from [Wolke et al. \(2013\)](#) work tracking young people for almost two decades and [Hinduja and Patchin's \(2018\)](#) update on cyberbullying, there is an overwhelming outcome of stunted socio-emotional development. **The disrupted socio-emotional progress is what frequently leads to many of the long-term consequences** which are identified by the Action Plan against Cyberbullying. However, the strategy put forward by the Commission is one which underestimates **the importance of placing wellbeing as a central policy objective or of focusing on developing the socio-emotional competences of all Europeans.**

To this end, the Action Plan must be aligned with the DG EAC [Guidelines on wellbeing and mental health at school](#). These have been developed by an expert group, with some targeting [policymakers](#), while others targeting [practitioners in education and training](#). Considering the great attention given to cyberbullying in these Guidelines, the Action Plan must be implemented taking into consideration all existing EU resources, and focusing on the preventive aspects defined by means of boosting wellbeing in education and training and developing socio-emotional competences.

The reason why the Guidelines, as well as numerous members of LLLP, **focus on socio-emotional learning is that it develops an environment where healthy relationships among learners and with educators can be fostered, promoting inclusiveness, non-discrimination, respect, resilience, and an ethic of care. This can serve as a prevention for (cyber)bullying.** Furthermore, such competences also stay at the basis of boosting learners' empowerment. The Action Plan against Cyberbullying proposes one action to strengthen child participation in policy design and implementation of measures for child well-being. Though this is appreciated, it is too little and too vague.

Children's empowerment for participation comes only if policy design processes are accessible, with multiple entry opportunities in this process, and the children are supported to develop competences to meaningfully participate. Such competences include the socio-emotional ones described above. **The Action Plan does not explain sufficiently how this will be achieved, providing no examples of methodologies for engagement of children, providing no connection with the aforementioned Guidelines, identifying no trusted organisations that can monitor the Member State' progress on engaging children in policy design.**

Can digital providers have more responsibility in the narrative of de-regulation?

The Action Plan specifically refers to the Digital Services Act (DSA), the Audiovisual Media Services Directive (AVMSD) and the AI Act as legislative tools to prevent cyberbullying. The strong regulatory focus is appreciated by the civil society but appears at odds with the existing de-regulation discourse at the EU level. The [EU Digital Omnibus](#) already foresees reducing requirements under the AI Act at a time when the [foreign powers such as the US are explicitly asking for revisions of the DSA](#). Therefore, the regulatory framework proposed by the Action Plan already appears open to interpretation and to reduced responsibility on providers. Considering the [landmark trials against social media platforms and their addictive design](#), and considering the strong correlation between providers reducing content moderation costs and instances of cyberbullying and hate crimes being on the rise, the Action Plan does not go sufficiently far in putting pressures on the providers to ensure a safe space for all users.

Higher investment in content moderation needs to be provided by all providers, with increased responsibilities on them to adapt all their tools in a child-friendly manner. Current suggestions for improving the reporting tools for instances of cyberbullying fall flat if law enforcement is not also equipped to deal with cyberbullying as a hate crime. Currently, victims report frequently not being taken seriously or a lack of follow-up on the reported cases. Beyond the improvement of the reporting system, **the Action Plan should help Member States codify the offence of cyberbullying in their legislation and provide a set of guidelines on prosecution and investigation of such cases.**

The Plan briefly flags the Member States' initiatives to restrict social media aspects to youngsters. This is an example of short-sightedness as the enforcement of such measures would be extremely difficult, while this does not improve the content on social media and address cyberbullying as something harmful. Children banned from social media until the age of 16, assuming that they would not access these platforms before, would still end up joining platforms where cyberbullying is practiced and continue to lack the relevant competences to protect themselves against it. Furthermore, the current [measures implemented in Australia and tested for countries such as Denmark or France include age inference - identifying a user's age based on their online behaviour - as well as data collection to verify age](#). Based on governmental reports, the age inference method is already proven to be the least effective for teenagers, while the increased data collection, including on biometric aspects, poses serious data privacy issues and might, in the long-run, put children at greater risks.

The onus of regulation placed on providers should not come at the expense of increased surveillance and data collection, but should rather rely on the measures which improve the safety of an online space for all users, irrespective of age. Banning children's access from the online environment is not the solution, but rather ensuring that the content available online is not harmful.

Underestimating the impact of AI

As AI solutions are proposed to combat cyberbullying, the Action Plan does also identify the ways in which AI could worsen the situation. The references to sextortion scams fail to account for the scope of damage that AI can cause. All cases of doxxing can be aggravated by tools that can now instantly scrap all the online information about someone, compiling a file which can then easily be disseminated. Moreover, AI bots can escape content moderation safeguards imposed by platforms and the sheer volume of attacks that they can create, as well as the detailed personalisation of such messages, would result in waves of harmful content thrown at vulnerable users. The speed of generation, scalability, and capacity to disseminate content instantly has far reaching implications for combatting cyberbullying. The current regulations which require AI-generated content to be labeled as such are clearly not met. **In this context, the Action Plan appears overly confident at addressing the AI situation by mostly referring to existing dysfunctional tools.**

While the Action Plan refers back to the [Better Internet for Kids](#), **there is no direct or explicit reference across the entire Plan to [AI Literacy](#) and to developing people's understanding of and capacity for effective and safe usage of AI.** LLLPlatform strongly believes that the first action to be taken is regulating the online space and ensuring that the onus of responsibility regarding AI usage is placed on platforms incorporating AI and/or the AI providers. However, in tandem with this approach, the EU and the Member States must develop the right competences for users to understand how AI is used in relation to them, and also to develop an ethical behaviour in relation to how they engage with it. This includes the creation of safe spaces in education and training institutions, and at home, and should build on existing initiatives such as the Better Internet for Kids. This is of particular importance because not only AI tools can process, utilise, and potentially disseminate sensitive information, but they can even replicate and

steal identities by using images and voices to commit illicit acts. Elderly people and vulnerable groups that are less experienced with digital tools should be more explicitly protected.

The general regulatory rulebook cannot work in the same way on AI, and it is important to identify the fact that users find themselves in isolation when targeted by cyberbullying. The education and training institutions, in collaboration with a vast network of support services for the victims and perpetrators of cyberbullying, must create the physical community which breaks down the patterns of isolation and provides opportunities for increasing digital competences and resilience into navigating digital environments.

Recommendations

LLLPlatform support the Action Plan against Cyberbullying but recommends a series of actions to strengthen its implementation:

- Better align the Action Plan implementation with the existing legislative tools and frameworks, in particular with the [EU Guidelines on Well-Being and Mental Health in Schools](#) and the results of the JRC [Study on Well-being in Digital Education](#) but also including socio-affective education in school curricula;
- **Strengthening multisectoral collaboration** involving teachers, school leaders, parents, social workers, social partners, civil society organisations and local authorities as part of the wider educational community, based on the whole-school approach and whole-system approach;
- **Prioritise strengthening learners' well-being** and their resilience competences as a prevention measure to cyberbullying;
- Expand the scope of the Action Plan to include **adults as a target group**;
- Expand the scope of the Action Plan to frame **cyberbullying as a hate crime**, particularly in cases involving bias-motivated harassment;
- Inform the implementation of the Action Plan with provisions of **media literacy and particularly AI literacy**;
- Strengthen the **responsibility of providers to protect most vulnerable groups**, especially when it comes to moderating violent conduct and aggressive content;
- Promote **Community Lifelong Learning Centres** as a viable community-based learning environment to both prevent and counter cyberbullying.