



Norwegian Ministry
of Children and Families

Meld. St. 32 (2024–2025) Report to the Storting (white paper)

Safe upbringing in a digital society



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*Recommendation from the Ministry of Children and Families, 10 June 2025,
approved by the Council of State on the same day.
(Støre Government)*

Part I

Introduction – Upbringing in a digital society

1 A safe, active and participatory upbringing



Figure 1.1

1.1 Children and young people in a digital society

All children shall have good and safe conditions for upbringing and life. They shall be able to manage their own lives and be well-equipped for adulthood. These objectives are the cornerstone of child and youth policy and remain unchanged, even as the world in which children grow up changes.

Today, children grow up with screens, technology, and big technology companies as part of their everyday lives. Therefore, the Government will take steps to ensure that all children receive a safe upbringing in a digital world. Screens and algorithms should not consume a child's upbringing. Screen use is extensive, and Norwegian children and young people have among the highest levels of screen use, social media use, and digital technology engagement in the world. The challenges we face must be solved together. Adults around children, authorities, and service providers must ensure that the digital environment is safe and adapted to children. To do this, we must recognise the challenges and problems we face and understand the landscape. The Government seeks to take measures that safeguard children's

rights and to weigh children's various rights against one another, where necessary. Digital development is rapid, and a child's everyday life today looks vastly different from just a few years ago. Knowledge about how digital technology affects children is also developing rapidly, but it lags behind the technology that shapes children's everyday lives. Therefore, the Government believes it is sensible to take a precautionary approach to ensure that children growing up are not exposed to technology that could be harmful to them and their development.

In Norway, children and young people grow up with easy access to screens such as smartphones, tablets, and PCs. These devices are a natural part of children's and young people's everyday lives. Increased access to the internet and digital tools provides children and young people with opportunities, including for self-expression, play, and learning. At the same time, increased access to the internet and digital tools presents a number of new risks. Through digital platforms, commercial actors have a major influence on children's everyday lives.

There is insufficient knowledge about the consequences of screen use; however, what we do

know suggests that it has several negative effects on children. Children and young people are often left alone to process the impressions and challenges they encounter in digital channels. Parents are responsible for protecting children and giving them a safe upbringing. The digital pressure on children is so extensive that parents find it difficult to cope with it on their own. Many parents are asking for clear advice on how to deal with the challenges this presents. Today, society is also failing to adequately protect children and young people in the digital environment. The Government wants to address this issue. Mobile phones have already been removed from classrooms through a clear recommendation. Increased penalties for illegal marketing to children has been proposed. Platform providers and commercial operators are subject to closer monitoring by the authorities. Professional advice on screen use has also recently been developed to guide children, parents, guardians, health personnel, and other professionals.

The Government is concerned that screen use is occurring at the expense of other activities that are important for a healthy and balanced upbringing. For example, physical activity, good sleep, and reading books are important for brain development and for children and young people's learning. The content of digital services and their use can also be harmful to children and challenge their rights, particularly with regard to privacy and consumer protection, and the right to a life free from violence. The negative aspects of children's internet use most affect children who are already in vulnerable situations.

The Government will continue to strengthen its efforts to create a safe environment for children and young people when they use technology and explore the internet. The Government will develop policies that protect children while balancing the positive and negative aspects of children's internet use. Children's rights must be safeguarded in the digital environment, as in the physical environment.

The Government believes that there is a need for common frameworks and rules for children's use of social media, digital platforms, and other digital tools, and that it is a policy task to make it practically possible to limit children's and young people's screen use.

The family is crucial in providing children with a good and safe upbringing. Children depend on their parents and other caregivers to look after their interests and needs – including their everyday digital lives. Parents have an important role in

guiding and safeguarding the child's right to participation and in making decisions in the best interests of the child. The screen use exhibited by parents and other family members also affects children's development and upbringing. The Government believes it is important to raise awareness of adults' screen use and its impact on families and children. Increased knowledge and better advice and guidance will ensure children a safer and better upbringing.

In addition to the family, kindergartens and schools shall help children and young people develop the skills they need to manage their everyday lives. Children and young people's digital competence is important for how they manage their lives, their development, and their future opportunities.

However, parents and children should not be left alone to deal with the challenges they face in a digital society. Public services that work with children, young people, and parents and guardians shall have sufficient knowledge of the challenges faced by children and parents and guardians to understand, follow up, and protect children and young people. They shall also provide guidance to parents.

The Government seeks to reduce commercial pressure and harmful use and protect children from sexual exploitation. Therefore, there is a need to regulate children's access to screens and digital devices more extensively, with measures that limit the risks. The Government will require technology companies that offer digital services to help protect children and facilitate safer use of their services.

Thus, the Government is hereby presenting the first comprehensive white paper on children's upbringing in a digital society. The report contains an evidence base, objectives, and measures suitable for taking important steps to ensure the fundamental goal of child and youth policy: that all children shall have a good and safe upbringing and living conditions, and that they shall be able to manage their own lives and be well-equipped for adulthood.

1.2 The Government's objectives

The Government will develop a comprehensive and evidence-based policy for children's digital upbringing. In a digital society, it is crucial that children are safe, that they actively participate in the digital environment by engaging and seizing the opportunities offered by the internet, and that

they feel included. The authorities shall be active drivers in strengthening children's rights in the digital environment. This requires good coordination and alignment across sectors. Children's rights must be at the heart of policy, and children shall be actively involved in the development of policies and measures.

The Government will work to ensure that:

Digital services, platforms, and marketing on the internet are adequately regulated and safeguard children's rights

Digital tools and media strengthen many of the rights of the child, but technology is not neutral and is often not adapted to children. The authorities also expect service providers and platform owners to safeguard children's rights. Children shall be protected against commercial exploitation, harmful content, abuse, and misuse of personal data. Legislation shall impose requirements on technology companies offering digital services used by children to both ensure the protection of children and facilitate the proper and safe use of those services.

Public services are accessible, up-to-date, and adapted to children and young people

Adults who work with children must have knowledge about children's everyday digital lives. They must understand the opportunities children have online, the services they use, and the challenges they may face. This is necessary in order to ask the right questions, work preventively, and help and protect children when needed.

Parents and caregivers shall have knowledge about children's everyday digital lives

Parents and caregivers are responsible for providing children with a good and safe upbringing, and they must have the knowledge needed to manage children's everyday digital lives. Children depend on parents and others to safeguard their interests, needs, and rights in a digital society. Parents must have the knowledge needed to secure their children's future in the best interests of the child. Parents are role models, and their internet use affects their children's development and rights.

Children and young people shall be aware of their rights and how to stay safe online

Children must be equipped to handle the challenges they encounter online. This means that children must learn how to stay safe online, how and why to set limits on their screen use, what rights they have, and where they can get help when they need it. It is also about ensuring that adults in schools and kindergartens have the knowledge to guide them.

The authorities are developing a comprehensive and evidence-based policy for children and young people's digital upbringing

In order to give children and young people a safe upbringing, the policy must be comprehensive, coordinated, and evidence-based. Children and young people must be involved in policy development to ensure that it is relevant and adapted to their needs. Enhanced research, sharing, and dissemination of knowledge, along with cross-sectoral cooperation, all guided by the best interests of the child, will pave the way forward.

1.3 Children's fundamental rights

Children have special rights under the Constitution of Norway and the UN Convention on the Rights of the Child that shall be safeguarded, including in the digital environment.

Article 104 of the Constitution covers human rights that apply specifically to children, and through this provision, several of the most fundamental international principles of children's rights are enshrined in the Constitution. The first paragraph stipulates that children have the right to respect for their human dignity and that they have the right to be heard. The principle that the best interests of the child shall be a primary consideration for actions and decisions that affect children derives from the second paragraph, while the protection of children's personal integrity and their right to development are outlined in the third paragraph. Article 100 of the Constitution enshrines freedom of expression as a fundamental human right. The general protection of freedom of expression also applies to children.

The Convention on the Rights of the Child was ratified in 1991 and lays the foundation for children's rights. The articles of the Convention that are particularly relevant to children's digital upbringing are Article 13 on children's right to

freedom of expression and Article 17 on the right to information, including the right to protection from information that is harmful to children's well-being. Children's specific right to privacy is enshrined in Article 16 of the Convention, and Article 24 stipulates that children have the right to the highest attainable standard of health. Furthermore, Article 18(1) of the Convention stipulates that both parents have common responsibilities for the upbringing and development of the child, and that the best interests of the child will be their basic concern. Article 18(2) stipulates that States Parties shall provide appropriate assistance to parents and guardians in the performance of their child-rearing responsibilities. According to Article 5 of the Convention, the authorities shall respect the responsibilities, rights, and duties of parents to provide direction and guidance in the child's upbringing. According to Article 19, States Parties shall take all appropriate measures to protect the child from all forms of physical or mental violence, injury or abuse.

The Government proposes to strengthen children's fundamental rights in the bill on a new Children Act (Prop. 117 L (2024–2025)). An introductory chapter on rights is proposed, which focuses on the rights of the child and clarifies the consideration of the best interests of the child, the child's right to participation, the child's right to care, development, and protection from violence, the child's right not to be discriminated against, and the child's right to family life. Furthermore, the Government proposes a new provision on children's right to privacy and parents' responsibility to safeguard this right.

1.3.1 Children's rights in the digital environment

In 2021, the UN Committee on the Rights of the Child published General comment No. 25 on children's rights in relation to the digital environment. The purpose is to provide guidance to States Parties and other actors on how to protect children's rights in the digital world. General comment No. 25 provides specific recommendations on how this can be achieved. The main points of the comment can be summarised as follows:

- Children have the right to participate in the digital environment and enjoy the benefits it offers. At the same time, States Parties and other actors must protect children from potential risks and dangers.
- States Parties and other actors must ensure children's right to privacy and data protection

in the digital environment. This includes limiting the collection and use of children's personal data and protecting them from surveillance and tracking.

- Children have the right to freedom of expression in the digital environment, but this right must be weighed against the need to protect children from harmful content and harmful behaviour from other users.
- States Parties and other actors must protect children from online bullying and other forms of digital violence. This means ensuring effective legal remedies and support measures for child victims.
- Children have the right to access information and knowledge online. States Parties and other actors must ensure that all children have equal opportunities to participate in the digital environment, regardless of their economic, geographical, or social background. Provision should be made for training children, parents, caregivers, teachers, and relevant professionals.
- States Parties and other actors must protect children from sexual exploitation, abuse, and child trafficking online.
- Children have the right to participate in the development of technology and digital services that affect their lives. States Parties and other actors must involve children in the development of policies and measures that affect their rights in the digital world.

1.3.2 Children and young people's participation in the work on the white paper

The Government involves children and young people in the development of policies concerning their upbringing, in line with the Constitution of Norway and the Convention on the Rights of the Child. Children and young people have participated in the work on the white paper through youth representatives from the county authorities' youth councils, youth organisations, youth panels, surveys, and the Sámi Pupil Forum.

The Norwegian Media Authority established *Ungdomsnettverket* (the Youth Network) in connection with the development of an action plan for a safe digital upbringing. The Youth Network has provided comments and made demands for the Government's work on children's digital upbringing (see Box 1.1).

See also the appendix for a description of the actors who have contributed to the work on the white paper.

Box 1.1 The Youth Network's demands for a safe digital upbringing

Knowledge about and for children and young people

Children must be aware of their own rights and how to stay safe online. Therefore, there should be a knowledge and resource centre for digital competence, where children, parents, and adults who work with children can access safe, nuanced information regarding digital upbringing.

Strengthen children's digital consumer protection

Children shall be protected from harmful content and exploitation. Marketing aimed at children has increased with the use of social media. Politicians must ensure that children are protected from harmful marketing and the exploitation of their privacy.

Strengthening children's legal protection

Children and young people are vulnerable when dealing with the police and the justice system. Therefore, children and young people must know their rights and have access to good, age-appropriate information on how to notify and report when they experience something unacceptable. Children must also have the opportunity to report anonymously to platforms and to the police.

Accessible digital leisure time

Many children enjoy video games as an important leisure-time activity. Video games and gam-

ing equipment can be expensive. For all children to enjoy equal opportunities to participate in digital leisure-time activities, these activities must be accessible in places where children and young people meet. Physical meeting places, such as youth clubs and events organised by voluntary organisations, must be adapted to offer digital leisure-time activities for all children.

A safe online culture

The internet offers many opportunities for children to learn, play, and develop. Nevertheless, online culture is characterised by a harsh, sometimes harassing culture. It is important to take a stand against online harassment and hate, including in gaming culture and the tone of public debate. Sexuality education should therefore be strengthened to counteract gender-discriminatory attitudes that are pervasive on digital platforms.

Focus on channels for participation

Children and young people must be involved when we develop new policies that affect them. This will result in better policies and more effective measures, as well as strengthening Norwegian democracy. Politicians should therefore focus on and develop new methods and channels for participation and also prioritise funding for these processes.

1.4 Background to the white paper

This is the first white paper to provide a comprehensive overview of children's digital upbringing. In line with the Convention on the Rights of the Child, the term 'child' in this white paper means every human being below the age of 18 years.

A number of measures have been initiated to safeguard children's safe digital upbringing. This white paper assesses the measures in context and weighs them against children's various rights. The white paper builds on the white paper on art

and culture for, with and by children and young people (Meld. St. 18 (2020–2021)), which provides a thorough description of digital culture and sets out the premises for central government coordination in this area. It also builds on *Rett på nett* (Rights online), the national strategy for a safe digital upbringing, which was presented in 2021. The strategy describes the opportunities and challenges in children's digital upbringing. The strategy describes how the vast majority of children thrive online and associate many positive things with the digital world, while also highlighting the risks associated with children's internet use. A

Box 1.2 Work with significance for children and young people's digital upbringing

In recent years, several white papers, proposals to the Storting, strategies, and official reports have highlighted challenges relating to children's digital upbringing and recommended measures. The most important of these are:

- Norwegian Official Report (NOU) 2019: 19 *Jenterom, gutterom og mulighetsrom – Likestillingsutfordringer blant barn og unge*, on gender equality challenges among children and young people (UngIDag Committee)
- The National Strategy for Artificial Intelligence (2020)
- Action plan for suicide prevention (2020–2025) No one to lose
- NOU 2021: 3 *Barneliv foran, bak og i skjermen*, on children's lives in front of, behind and on the screen (Report by the Social Media Harms Committee)
- *Rett på nett* (Rights online) – national strategy for a safe digital upbringing (2021)
- Prevention and combating of internet-related abuse of children – national strategy for coordinated efforts (2021–2025)
- NOU 2022: 9 *Open and enlightened public discourse* (Report by the Freedom of Expression Commission)
- NOU 2022: 11 *Your privacy – our shared responsibility* (Report by the Privacy Commission)
- Meld. St. 23 (2022–2023) *Escalation Plan for Mental Health (2023–2033)*, white paper from the Ministry of Health and Care Services
- Strategy for digital competence and infrastructure in kindergartens and schools 2023–2030
- Action plan for increased inclusion in a digital society (2023)
- Prop. 36 S (2023–2024) *Opptrappingsplan mot vold og overgrep mot barn og vold i nære relasjoner (2024–2028) – Trygghet for alle*, draft resolution on an escalation plan against violence and abuse against children and violence in close relationships (2024–2028), Ministry of Children and Families
- Action plan for a safe digital upbringing (2024)
- *Tid for spill* (Time for games) – the Government's gaming strategy 2024–2026
- NOU 2024: 3 *Joint efforts against extremism: Better conditions for preventive work* (Report by the Commission on Extremism)
- NOU 2024: 20 *Det digitale (i) livet – Balansert oppvekst i skjermenes tid*, on a balanced upbringing in the age of screens (Report by the Screen Use Committee)

national strategy for preventing and combating internet-related abuse was presented in 2021 and contains a number of measures to protect children from internet-related abuse and sexual abuse online. The same applies to the draft resolution on an escalation plan to combat violence and abuse against children and violence in close relationships (2024–2028) (Prop. 36 S (2023–2024)), which was presented in December 2023. In 2023, a strategy for digital competence and infrastructure in kindergartens and schools was also presented. Furthermore, in September 2024, the Government launched *Digital Norway of the Future – National Digitalisation Strategy 2024–2030*. One of the five priority areas of the strategy is to maintain trust, strengthen inclusion, and

ensure consideration for children and young people. The rights of children and young people shall be taken into account in the design of digital public services. The action plan for a safe digital upbringing was developed by a group comprising directorates and supervisory authorities, led by the Norwegian Media Authority. The action plan was launched in October 2024 and maps the central government's efforts in the area of safe digital upbringing, describes the challenges and existing measures, and proposes possible measures to address them. The mapping shows that the central government's efforts are largely aimed at individuals, while the challenges indicate that children and young people need greater protection at the system level to have safe digital upbringing.

Part II

*Children and young people's use of digital tools
– Opportunities, challenges and rights*

2 Characteristics of children’s upbringing in a digital society

Children’s everyday lives are characterised by the constant presence of digital tools that influence how they learn, play, communicate, and experience the world. Children use the internet to contact support services, meet friends, watch films, play games, watch the news, express their political views, do their homework, buy bus tickets, or go to the cinema. Pupils find both subject material and assignments online. The internet is used to collaborate, submit homework, and contact teachers and other school staff. If children experience digital exclusion, this can affect their social life, leisure time, schoolwork, and access to services. A participatory upbringing ensures that children feel included and heard in digital spaces, where they can express themselves and connect with others. A digital society requires the active participation of children and others. It is crucial to recognise and value the importance of such an upbringing in order to prepare children for participation in today’s and tomorrow’s society. The UN Committee on the Rights of the Child points out in General comment No. 25 that the digital environment is becoming increasingly important in most aspects of children’s lives, including in times of crisis, as societal functions such as education, public services, and commerce rely on digital technology.

2.1 A changed upbringing

Children and young people’s upbringing has changed significantly in recent decades due to digital developments. In the book *Ungdommen* (Youth), researchers describe the development of a digital youth culture.¹ From the 1990s to the present day, increasing aspects of everyday life have shifted online. In the mid-1990s, just over half of young people had access to a PC at home, and very few had access to the internet. However, this changed rapidly.

In the 2000s, using the internet was relatively expensive. In addition, young people had to stay at

home in order to be online. Gradually, more and more young people acquired their own PCs, and between 2000 and 2010, a new youth culture emerged. Digital gaming platforms became more accessible. Young people could sit alone in their rooms, but still be in contact with each other and the outside world. A number of blogs and sharing services provided new opportunities to connect people, share content such as images, music, thoughts, or opinions, and give feedback. The 2000s saw the advent of smartphones, with the launch of the iPhone in 2007 marking a turning point. With cheaper and faster internet access than before, mobile data and smartphones, it became common to go online outside the home. Screen use increased. In 2010, 97 per cent of young people in Norway accessed social media daily, and the proportion who spent at least three hours a day in front of a screen rose from 50 to 65 per cent. As young people’s screen use has increased, there has been a marked decline in the time they spend together in person at home.

In 2020, Norway and the rest of the world were struck by a pandemic, and the digitalisation of society and children’s everyday lives accelerated. Infection control measures led to periods of school closures, interruptions in organised leisure-time activities, and limited physical interaction with others. Video games and audio and video calls became more important for children’s social interaction than before. The digitalisation of schools also accelerated during the pandemic. It became more common for each pupil to have their own digital device.²

Today, almost all children over the age of nine have access to a smartphone. In 2024, the proportion of people aged 13 and over who used social media was close to 100 per cent. Social media use was also high among those under the age of 13. Fifty-three per cent of nine-year-olds have used one or more social media platforms. Among 12-year-olds, the proportion was 91 per cent.³

¹ Bakken et al., 2021.

² Munthe et al., 2022.

³ Norwegian Media Authority, 2024b.

2.2 Children’s digital everyday life

Today, digital tools and media are an integral part of children’s upbringing. Smartphones, computers, and the internet are present in and influence most children’s lives. In everyday life, children and young people often do not distinguish between analogue and digital activities. School, leisure-time activities, communication and socialising with family and friends, searching for information, expression, and entertainment often take place digitally.

Children and young people use the internet to seek out and contact public services. Many young people receive an electronic identification when they apply for upper secondary education and training. When they turn 16, young people log in to *Helsenorge* (the official Norwegian health portal) themselves if they want to book a doctor’s appointment or access their prescriptions.

The internet and digital tools are also a source of knowledge and skills for creative leisure-time activities. In recent years, digital and online services and teaching methods have gradually been incorporated into the development of cultural schools. Digital media offer children and young people the opportunity to create, share, and engage in a variety of cultural expressions, such as music, games, video, digital art, animation, and much more. Young people have the opportunity to reach a large audience, find communities of interest, and collaboration partners. Algorithms play a key role in determining what content is offered to users. They help children easily access content they find interesting. However, this results in them receiving less variety in information and viewpoints, leading to what is known as *echo chambers*. Additionally, children who search for something harmless may be led deeper into a specific topic, a process often referred to as a *rabbit hole*. Such rabbit holes can be harmful if the child is exposed to increasingly extreme or radicalised content.⁴

Digital media has also contributed to making various communities and activities more accessible, for example, for children and young people who have physical barriers to participation, and where geographical distance is an obstacle to participation.

The internet also poses a risk that children and young people may come into contact with and be exposed to crime. There has been a sharp

increase in reported abuse of children on the internet in recent years (see Chapter 5).

2.2.1 Time spent in front of screens

Norwegian children spend more time on screens than other European children, and screen use has increased rapidly and significantly over time. In 2016, 9–15-year-olds spent 1 hour and 56 minutes on screens on a typical day, while in 2023, this had increased to 4 hours and 32 minutes per day. Sixty-eight minutes of screen use occurred in a school context.⁵

In 2024, the Norwegian Media Authority surveyed how much time children and young people spend on various mobile activities each day.⁶ Among 9–18-year-olds, 36 per cent were what is known as *heavy users* of social media, 28 per cent were heavy users of series and videos, and 20 per cent were heavy users of mobile games. *Heavy users* are defined as individuals who spend at least three hours a day on a single mobile activity. In addition to this time spent, there was other screen use and mobile phone use. Only 30 per cent of those surveyed believed that they spend too much time on their mobile phones. Statistics Norway’s *Norwegian Media Barometer* surveys, among other things, Norwegians’ use of the internet.⁷ As Figure 2.1 shows, the amount of time children and young people spend online has increased over the last 13 years. How much time children and young people spend in front of screens, and what they use them for, varies by age and gender.

In a NOVA – Norwegian Social Research report, researchers divided young people into five groups based on their leisure-time activities, including internet use, and examined developments since 2014.⁸

1. “Those who most often spend time with friends” are social both online and in person, participate in organised activities, and attend youth clubs. This group has seen the second-largest increase and now accounts for 33 per cent of all young people.
2. “The most home-oriented” use digital media frequently. They play video games, use social media, and watch television, but rarely go out or participate in organised leisure-time activities. This group has grown the most and now accounts for 26 per cent of all young people.

⁵ Schiro, 2023.

⁶ Norwegian Media Authority, 2024b.

⁷ Bekkengen, 2024.

⁸ Bakken et al., 2024.

⁴ Norwegian Consumer Council, 2024.

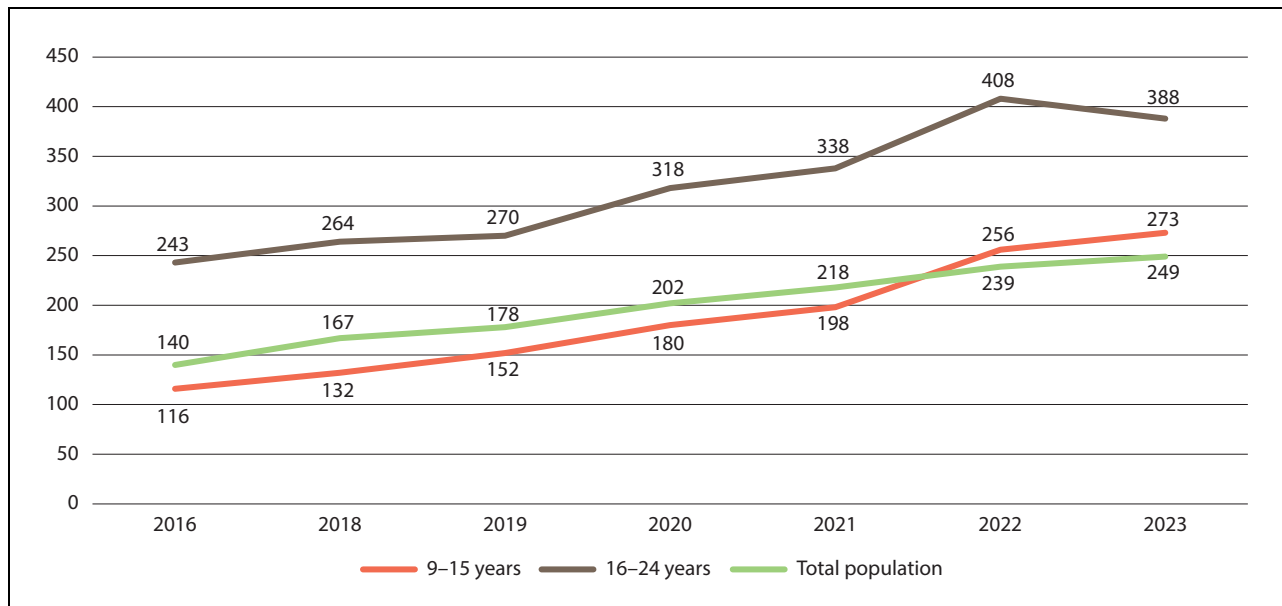


Figure 2.1 Number of minutes spent on the internet on an average day among 9–15-year-olds and 16–24-year-olds.

Source: Bekkengen, 2024, Table 8.1.

3. “The least digital” spend little time on screen activities, but a lot on school, reading, and organised leisure-time activities. This group has seen the largest decline and now accounts for 19 per cent of all young people.
4. “The most risk-oriented” are social, both physically and digitally, play more video games, and watch more television than the average person. They report more substance use and rule-breaking than others. This group has grown in size and now accounts for 13 per cent of young people.
5. “The most culturally engaged” participate in creative activities, often attend youth clubs, and spend relatively little time in front of screens. This group has decreased and now accounts for 9 per cent of all young people.

Overall, much of the shift in group sizes can be explained by the fact that digital activities have become a larger part of the leisure time of many children and young people.

2.2.2 Artificial intelligence

Artificial intelligence (AI) has quickly become a part of children’s and young people’s lives. Generative AI enables rapid retrieval and compilation of information, as well as the production of synthetic content, and is actively used for both education and play. In Kantar’s 2024 media usage survey,

almost half of 15–24-year-olds reported using ChatGPT in the last seven days.⁹ However, the use of AI starts earlier and is becoming increasingly common in apps and learning tools for children. Many children encounter technology that uses advanced algorithms before they have learned to read, evaluate content, or understand how the technology works.

Although knowledge of how AI affects younger children remains limited, some studies provide insight into how children interact with such technology. They show that many children interact with AI in ways that resemble social relationships.

AI is present in social media, for example, in the form of chatbots that children can talk to or form friendships with. This may be entertaining, but it can also challenge the formation of opinion and influence children’s behaviour in various ways. Children can develop close bonds with AI assistants and digital conversation partners.¹⁰ This is especially true for younger children who have not yet learned to distinguish between humans and machines. Children between the ages of three and ten may treat AI assistants as if they were real people. Some talk to them as if they were friends, saying that the technology “knows everything”, “never gets angry,” or “always lis-

⁹ Berg, 2024.

¹⁰ Hoffman et al., 2021.

tens”. Such statements suggest that children attribute emotions and intentions to the technology. This type of bond is referred to as a *parasocial relationship*. The child experiences attachment, even though the technology has no feelings or understanding of its own. Bonding with a digital conversation partner can affect children’s understanding of friendship and interaction. Furthermore, children and young people are particularly vulnerable to manipulation when using AI. There have also been cases where AI-based chatbots have developed emotional or sexual relationships with children and young people. In some cases, this has had serious consequences. Lawsuits have been filed where relatives believe that the technology contributed to psychological distress and, in some cases, suicide.¹¹ This highlights the dangers of children becoming attached to technology that lacks empathy or understanding.

AI is also integrated into children’s lives in “partially covert ways”¹² in recommendation systems and personalised services in social media and games. AI helps provide content tailored to what the user is interested in and engages with. At the same time, there are several examples of

undesirable use of AI, whether in connection with schoolwork, the production of fake and harmful images, audio, or videos, or the production of sexualised content.

There are currently few statistics and little knowledge about children’s use of AI, and it is difficult to predict how AI will affect children’s upbringing in the future.

2.2.3 Digital leisure time – social media and video games

Various digital activities form a key part of most children and young people’s leisure time, and many are particularly active users of social media and video games.

Digital media

Seventy-five per cent of children between the ages of nine and 13 report using screens for social media (see Figure 2.2). Among 9–18-year-olds, the most used platforms are YouTube (83 per cent), Snapchat (70 per cent), TikTok (58 per cent), Instagram (46 per cent), and Discord (20 per cent).

Half of 9–18-year-olds report that humour, memes, and funny videos are what they watch

¹¹ Montgomery, 2024.

¹² Slettemeås et al., 2025, p. 19.

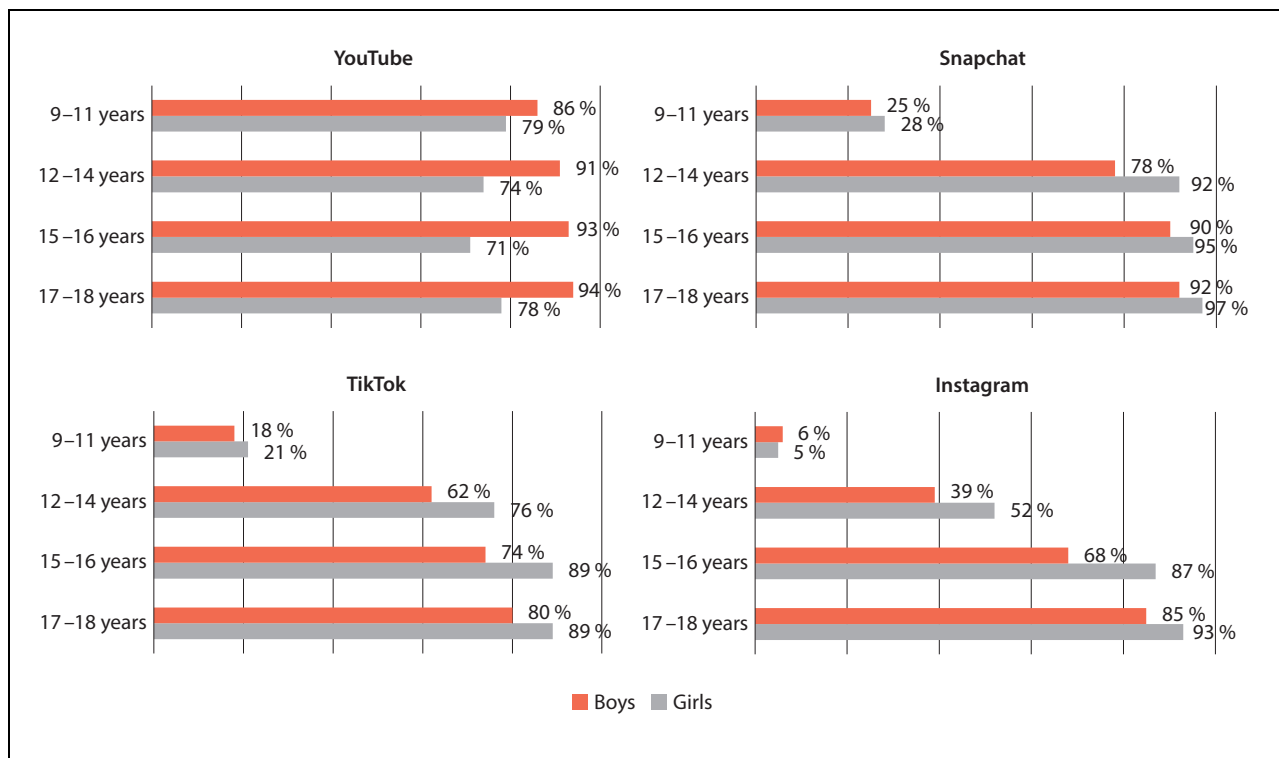


Figure 2.2 Percentage of users of Snapchat, TikTok, Instagram, and YouTube by gender and age.

Source: Norwegian Media Authority, 2024, Figure 10.

Box 2.1 Comments from children and young people: Gender differences in digital leisure time

Young people in the county authorities’ youth councils experience that gender differences in children and young people’s digital leisure time are “absolutely real”. They believe that there must be room for different interests, and that boys are often more interested in video games and girls in social media. At the same time, they believe that everyone should be allowed to pursue their interests, regardless of gender. They believe it is unfortunate that some digital arenas, such as video games, are more open to one gender than another. They find that many girls avoid video games because of social pressure and stereotypes, and the risk of being harassed. They report that “playing like a girl” is a common expression in gaming culture.

young people meet through social media, and that social media has made it possible to find information about being queer and to build networks. Twenty-nine per cent of 9–17-year-olds find it easier to be themselves online than when they are with others face-to-face.¹⁴

Video games

Most children play video games (Figure 2.3). In a 2024 survey, 86 per cent of 9–18-year-olds reported playing games on a PC, game console, mobile phone, tablet, or similar device.¹⁵ This applied to 93 per cent of boys and 79 per cent of girls. The frequency of gaming decreases with age for both boys and girls. A total of 72 per cent of boys aged 9–10 reported playing daily, while 57 per cent of 15–16-year-olds and 47 per cent of 17–18-year-olds reported the same. By age 17, a larger proportion of boys reported playing weekly or less frequently. Among girls, the trend is different, as a larger proportion of girls play weekly or less frequently. Thirty-six per cent of 9–10-year-olds play daily. The proportion who reported playing daily is only 16 per cent when girls turn 17, 30 percentage points lower than boys.

most. Music, sports, exercise, food, and fashion are mentioned by a third as the most popular types of content from influencers.¹³ *Skeiv Ungdom* (Queer Youth) has pointed out that many queer

¹³ Norwegian Media Authority, 2024a.

¹⁴ Staksrud & Ólafsson, 2019.

¹⁵ Norwegian Media Authority, 2024c.

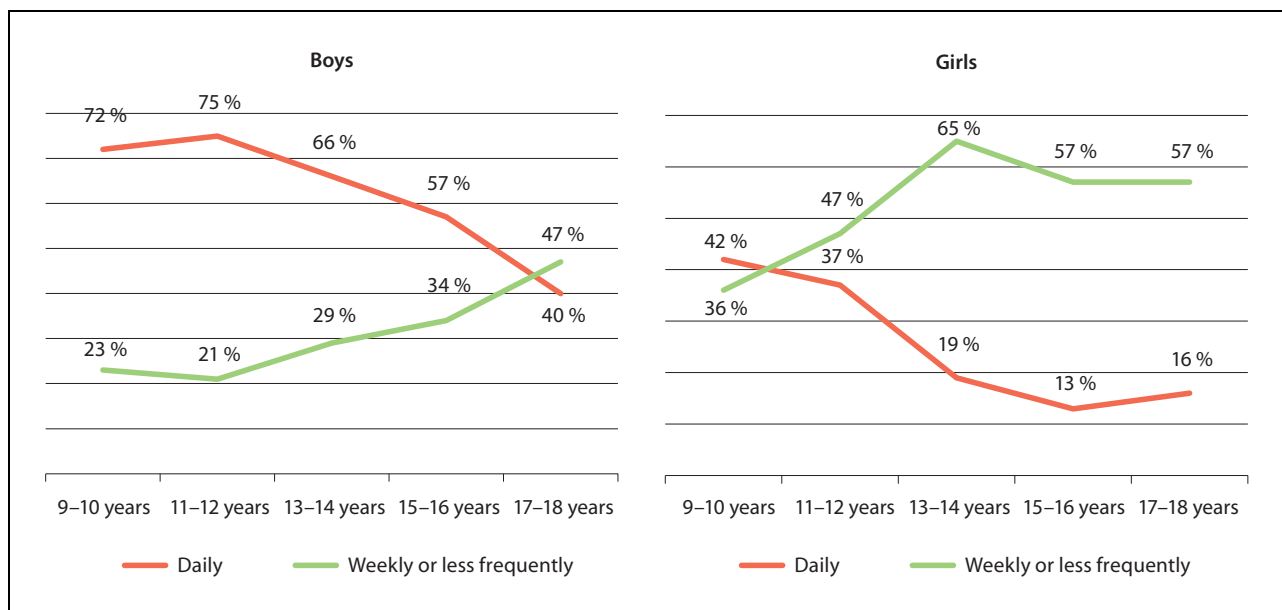


Figure 2.3 Percentage who reported gaming “daily” and “weekly or less frequently” by gender and age.

Source: Norwegian Media Authority, 2024k, Figure 3.

Box 2.2 Mapping of pupils' digital competence in Year 9

The International Computer and Information Literacy Study (ICILS) is an international comparative study of digital competence and algorithmic thinking among Year 8 pupils (Year 9 in Norway). The survey has been conducted in 34 countries. Norway participated in the study in 2013 and 2023. The study provides insight into the use of digital technology in schools and how schools use technology to develop pupils' digital competence.

2.2.4 Screens at school

Norwegian pupils use a lot of educational technology at school, both for academic work and other purposes. In the 2023 International Computer and Information Literacy Study (ICILS),¹⁶ 72 per cent of Norwegian Year 9 pupils reported using digital technology daily for schoolwork while at school. This percentage is lower than in Denmark and Sweden, but higher than the international average and in Finland. The use of digital technology varies across subjects, with Norwegian language and social studies being the subjects in which it is used in most lessons. Pupils use general digital tools such as presentations, word processing, and information websites in most lessons at school. The use of spreadsheets or tools developed specifically for classroom use (such as simulations and modelling, multimedia productions, or data logging) is less common. When educational technology is used effectively in teaching, it can provide opportunities for more tailored instruction and greater variety in teaching methods and sources of information.

Studies show that pupils in primary and secondary education and students in higher education have poorer reading comprehension when reading a text on screen than on paper. The Screen Use Committee, cf. NOU 2024: 20, points out that screens are particularly unsuitable for reading longer, coherent informational texts. Reading longer texts is particularly important for developing good reading proficiency, as well as cognitive skills such as critical thinking. Screens and digital devices can also be disruptive to teaching.¹⁷

¹⁶ Rohatgi et al., 2024.

The Screen Use Committee points out that using multiple media simultaneously (known as *media multitasking*), which involves constantly shifting attention between different media, can be linked to concentration difficulties. Media multitasking at school is associated with poorer learning outcomes and academic performance, and is distracting for both those who do it and those around them. The ICILS survey shows that Norwegian pupils are above the international average in terms of performing multiple activities at the same time while doing schoolwork at home.¹⁸ For Nordic pupils, multitasking is significantly negatively correlated with the results of the tests they took in the survey.¹⁹

2.2.5 Use of digital media in different age groups

Children and young people's screen use changes as they grow up, both in terms of how much time they spend on screens and what content they consume. Over the last decade, there have been major changes in what young people do in their leisure time, and digital activities have become increasingly important to their everyday lives. At the same time, young people are spending less time on schoolwork, fewer are reading books, and more are working out at the gym.²⁰

The youngest children

The digital activity of the youngest children is largely controlled by their parents and relatively limited. Thirty-eight per cent of parents with children aged one to four report that their child has access to a tablet.²¹ Within the same group, 10 per cent report that their children had access to screens independently before age one. According to their parents, the youngest children mainly use digital devices for entertainment. For the youngest children, screens can serve as a 'babysitter' and provide relief for parents. Among children aged 1–4 with access to tablets, 76 per cent watch video entertainment, and about half use gaming apps.²²

¹⁷ OECD, 2023.

¹⁸ Rohatgi et al., 2024.

¹⁹ Fraillon, 2024.

²⁰ Bakken et al., 2024.

²¹ Norwegian Media Authority, 2024g. The figures were based on responses from parents, only a small proportion of whom have children aged 1 to 5.

²² Norwegian Media Authority, 2024f.

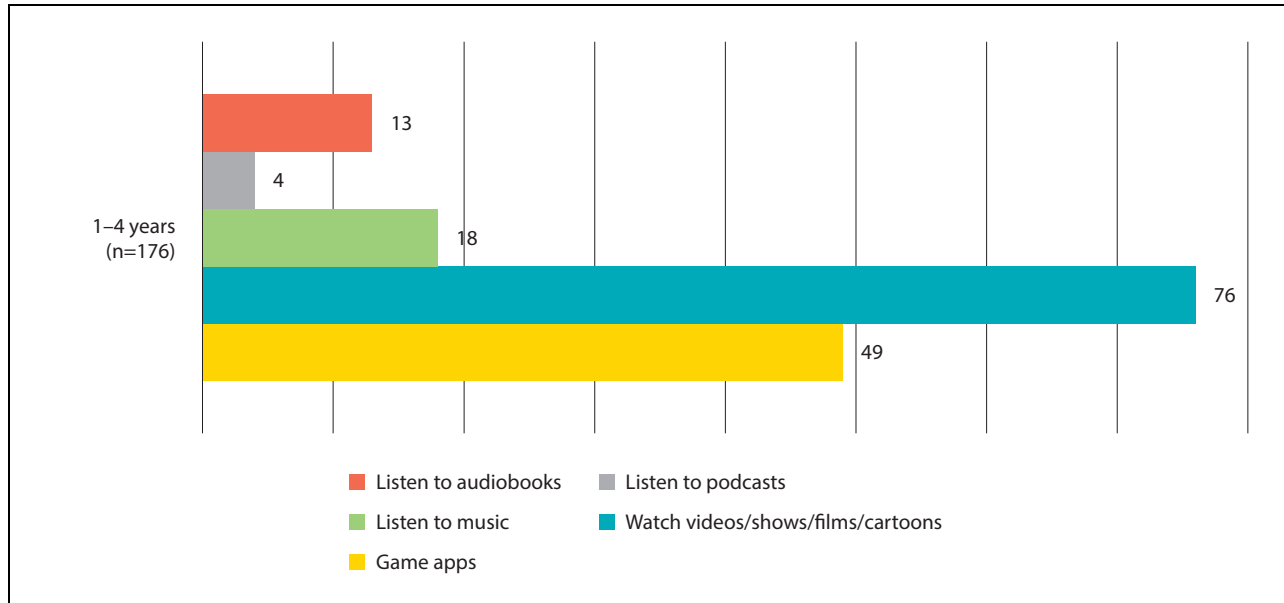


Figure 2.4 The digital activity of the youngest children

Source: Norwegian Media Authority, 2024g, Figure 10.

Children in middle childhood

The older the children get, the more the internet occupies in their lives. A total of 95 per cent of 9–12-year-olds use the internet every day. Children in this age group spend an average of 204 minutes a day online.²³ The Norwegian Media Authority's 2024 survey on children and media shows that when children are between five and eight years old, 20 per cent have a mobile phone and nearly a third use a smartwatch. Half have access to a game console, and 75 per cent have access to a tablet. The vast majority get their first mobile phone when they are between seven and ten years old, and 94 per cent have their own mobile phone when they are 9–11 years old.²⁴

Games are an important part of children's everyday digital lives, and the use of gaming apps on mobile phones or tablets is highest among children aged 5 to 10. A total of 81 per cent of parents report that their children in this age group play games on mobile phones or tablets.²⁵ The use of social networking services increases sharply at the age of nine. This is especially true for girls. A total of 73 per cent of parents of boys aged 5–8 report that their child plays video games daily or weekly.²⁶ The youngest users use social network-

ing services to talk to friends, comment on other people's posts and images, and create and share images. In the 2024 survey on children and media, two out of ten children aged nine to eleven report using TikTok, and just over 80 per cent report using YouTube. The use of Snapchat and Instagram increases among children aged 12–14.²⁷

Young people

Young people aged 16 to 19 spend an average of 397 minutes online each day, i.e., 6 hours and 37 minutes.²⁸ Almost all pupils have access to their own digital device in lower secondary school and upper secondary education and training. From lower secondary school onwards, laptops become more common, while tablets become less so. In Year 10, 55 per cent of pupils have access to a PC or Mac, 27 per cent have a Chromebook, and 16 per cent have a tablet. These figures remain roughly the same throughout lower secondary school.²⁹

During adolescence, the differences in digital use between girls and boys become more pronounced. A higher proportion of boys use Discord and YouTube, while girls are more likely to use TikTok and Instagram. Girls aged 15–18 are the

²³ Schiro, 2023.

²⁴ Norwegian Media Authority, 2024b.

²⁵ Norwegian Media Authority, 2024g.

²⁶ Norwegian Media Authority, 2024f.

²⁷ Norwegian Media Authority, 2024b.

²⁸ Schiro, 2023.

²⁹ Norwegian Directorate for Education and Training, 2022.

most likely to share images and videos on social networking services.³⁰

Many young people explore their sexuality online. In the 2022 survey on children and media, 55 per cent of 13–18-year-olds who had watched pornography online responded that they first saw pornography before age 13. More boys than girls have watched pornography online.³¹ In the Norwegian Media Authority's 2024 survey on children and media, 30 per cent of 13–18-year-olds responded that they had been sent naked images of others. This applies to more girls than boys. Over half have received such images from a stranger, and nearly a quarter from their boyfriend or girlfriend.³² The survey did not inquire whether the incidents were solicited or unsolicited. In the 2021 *Ung i Oslo survey*, 34 per cent of young people reported at least one experience of digital sexual violations in the past year.³³ The Norwegian Media Authority reports that 22 per cent of 13–18-year-olds have received unwanted sexual comments online in the past year.³⁴

2.3 Prerequisites for participating in the digital environment

Being able to participate in the digital environment is important for social relationships and a sense of belonging. When young people lack access to equipment or are otherwise digitally excluded, this has consequences for their social lives, leisure time, schoolwork, and access to support services. This may also be the case for children and young people whose mother tongue is not Norwegian, such as the Sámi, when digital resources have not been developed in their language. The Sámi Pupil Forum, which has provided input to this white paper, reports that there are few opportunities to use Sámi digitally. The UN Committee on the Rights of the Child emphasises in General comment No. 25 that all children must have equal and effective access to the digital environment in ways that are meaningful to them. The Committee calls on States parties to take all necessary measures to combat digital exclusion.

In NOU 2022: 9, the Freedom of Expression Commission stated that several groups face barriers to connection and participation in the public

sphere. In particular, the Commission highlighted that access to the public sphere is insufficient for persons with disabilities and that various minority groups face issues related to harassment and vilification when engaging in the public sphere. A common theme in comments to the Commission from young participants was that harassment and vilification can hinder self-expression.

2.3.1 Access to equipment and infrastructure

The vast majority of children and young people today have access to connected digital devices at all times and use them actively. However, there are still children who grow up in low-income families, and neither have access to nor can afford the equipment they need or want to participate digitally on an equal footing with other children. In the *EU Kids Online* survey, the majority of parents report that there are financial aspects of internet use that can be problematic.³⁵ The proportion of parents who find that various media and internet access are too expensive increases as the household income of the family decreases. In the action plan for inclusion in a digital society, one of the measures is to establish more schemes for the reuse of used equipment, including considering schemes for the lending of ICT equipment that include children and young people.

Internet access is generally very good in Norway. Few households lack access to fixed broadband or mobile networks with acceptable data

Box 2.3 Action plan for increased inclusion in a digital society

In June 2023, the Government presented an action plan for increased inclusion in a digital society. The aim of the action plan is to combat digital exclusion and ensure that as many people as possible are included in the digital community. The action plan is primarily aimed at groups experiencing digital barriers and digital exclusion. The action plan includes measures to ensure that those who want to participate digitally can more easily find support and assistance in acquiring the necessary digital tools and skills.

³⁰ Norwegian Media Authority, 2024b

³¹ Norwegian Media Authority, 2023b.

³² Norwegian Media Authority, 2024d.

³³ Bakken, 2023.

³⁴ Norwegian Media Authority, 2024d.

³⁵ Elvestad et al., 2021.

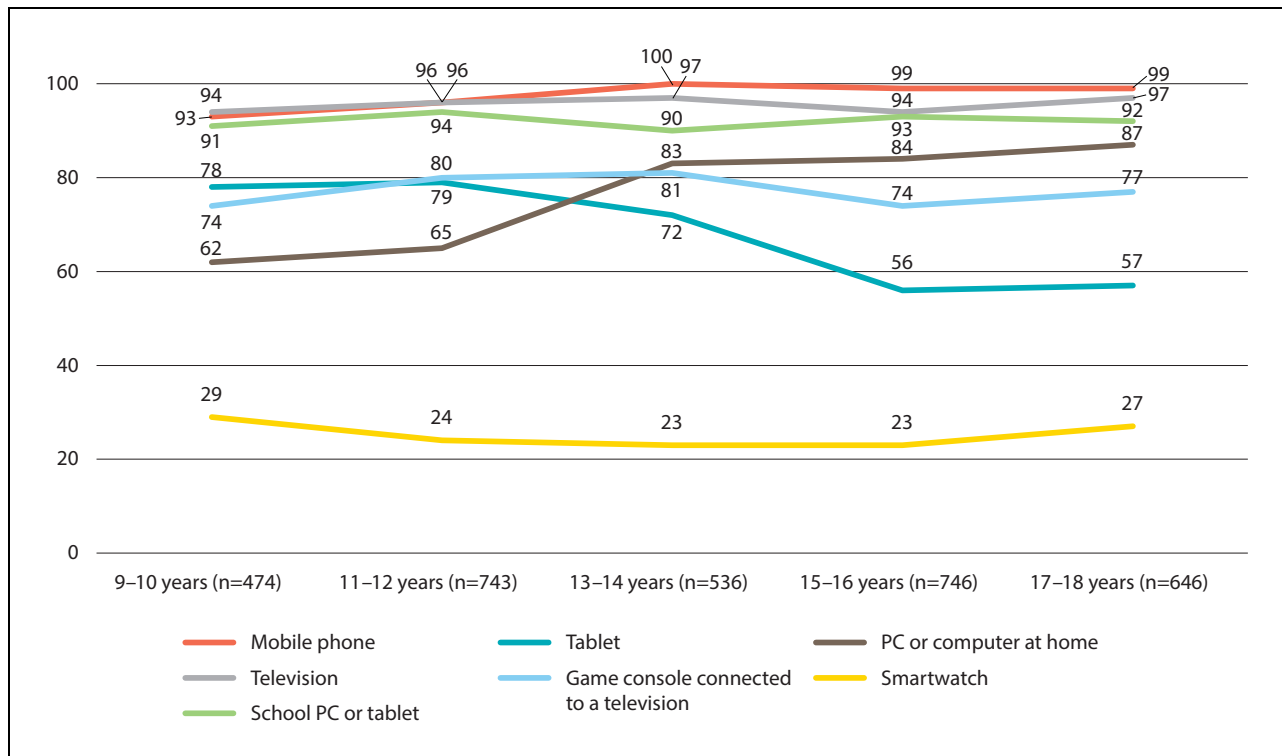


Figure 2.5 Percentage with access to equipment. Grouped by age

Source: Norwegian Media Authority, 2024b. Figure 2.

speeds.³⁶ In its digitalisation strategy *The Digital Norway of the Future. National Digitalisation Strategy 2024–2030*, the Government has set a target that everyone in Norway shall have access to broadband with a download speed of at least 1 gigabit per second by the end of 2030. The Government allocated NOK 400 million in 2024 to support the expansion of broadband in areas lacking commercial viability.

The Youth Network has called for accessible digital leisure time. They note that many children consider video games to be an important leisure-time interest. For all children to have equal opportunities to participate in digital leisure time, they must have access to physical meeting places that offer such activities. Physical meeting places, such as youth clubs and events organised by voluntary organisations, must be adapted to offer digital leisure-time activities for all children. The Youth Network and youth councils have emphasised the importance of digital services and platforms being accessible to all children, regardless of their economic background.

2.3.2 A good culture of expression

Children and young people's participation in the public sphere necessitates that they have access to channels for self-expression, the skills to participate across various platforms, and knowledge of how digitalisation in society affects the conditions for democracy and freedom of expression.³⁷ The culture of expression online influences whether children and young people dare to express themselves and participate in public discourse. Cyberhate and hate speech cause young people to withdraw from public discourse.

According to a report on the climate of freedom of expression in Norway, young people between the ages of 16 and 24 are more vulnerable to cyberhate than adults.³⁸ This is related to how active they are in sharing their views and opinions on social media. In the report, 25 per cent of respondents report participating more in the debate after experiencing cyberhate, while 32 per cent state that they have become more cautious.

³⁶ Norwegian Communications Authority (NKOM), 2023.

³⁷ Ministry of Children and Families, 2021.

³⁸ Norwegian Media Authority, 2024j.

Box 2.4 Parental supervision of their own children online

In a 2023 survey by Sentio, commissioned by the Norwegian Directorate for Children, Youth and Family Affairs, parents and children were asked about parents' supervision of their own children online.¹ When asked if there is anything that prevents them from supervising their child's online activities, parents responded as follows:

- One in three reported that there were no obstacles preventing them from monitoring their child's online activities. This group consists mainly of young parents under the age of 35 with the youngest children.
- One in three reported that their child's privacy is an obstacle to monitoring their child online. This category mainly consists of parents with children over the age of 14.
- Just over one in four consider it as an obstacle that their child does not involve their parents. This is again related to the child's age.
- Thirty per cent report they lack the knowledge to monitor their child's online activities.

- Sixteen per cent report they do not have time to monitor their children. Parents of children in the early school-age group (7–10 years) are overrepresented in this group.
- Only seven per cent report that their child does not follow the family's rules for internet use.

When asked whether they talk about what their children do online, parents and children respond differently:

- Seventy per cent of parents report that they talk to their children about what they experience online, while 57 per cent of children report that they *rarely* talk to their parents about what they do online.
- Fifty per cent of parents report that they often or very often talk to their children about what they do online, while only 20 per cent of children report that their parents do so either often or very often.

¹ Sentio, 2023.

2.3.3 Adults to rely on

Parents and other close caregivers are the most important people when it comes to looking after children's interests and needs. Parents are responsible for creating a safe environment for their children in their everyday lives. This is crucial for the emotional, cognitive, and social development of the child. Online, as in other aspects of a child's upbringing, parents should monitor their children's needs according to their maturity and age.

High digital competence, for both children and adults, is essential for children to navigate the internet safely. Safe adults with sufficient knowledge, digital skills, and literacy play a major role in guiding and monitoring children in their everyday lives, including on digital platforms. However, some parents find it challenging to keep track of the content of their children's online communication and to balance their parental role with their children's right to privacy (see Box 2.4).

Children may also need support and advice in unfamiliar or difficult situations that arise online. Parents and guardians have a particularly important role in being people children can safely turn

to with questions and concerns. However, figures from the European survey *EU Kids Online*³⁹ show that only 35 per cent of Norwegian children say they talk to a parent when they experience something negative online. Fifty per cent spoke to a friend of the same age, and 25 per cent did not talk to anyone. Young people also believe that parents and media platforms should take greater responsibility for ensuring that age limits are enforced, so that younger children are not on social media before they are mature enough to handle content intended for older users or hate speech.⁴⁰

Families are different and may have different capacities for guiding and enabling children to handle digital challenges. If the policy is based solely on parents having the digital competence to guide and set limits for their children's internet use, this could potentially contribute to reinforcing social inequalities. The Screen Use Committee highlights that many parents feel disconnected from their children's schoolwork, and parents' lack of digital competence can be an obstacle to using the school's digital solutions. It is particu-

³⁹ Smahel et al., 2020.

⁴⁰ Norwegian Media Authority, 2022.

larly those parents who report low digital skills who feel there is little cooperation with schools regarding the use of digital technology. Some parents may face a double challenge if they also have poor Norwegian language skills.

The action plan for a safe digital upbringing expresses a need to strengthen digital competence among the professions that work with children and young people. This includes employees who work with children in the health sector, child welfare services, family counselling services, and crisis centres. These are employees who, by virtue of their role, are responsible for helping to ensure that the rights of children and young people are safeguarded. To do this, they also need sufficient knowledge about the digital context in which the child lives.

2.3.4 Digital competence to participate

Children and young people develop digital competence by using the internet and digital tools themselves, learning from friends and parents, and through kindergarten and school. Children start using the internet and social media at an early age. The Youth Panel for Møre og Romsdal County has submitted comments on the importance of age-appropriate training, including on internet safety, safe internet use, source criticism, and the advantages and disadvantages of using digital tools.

Digital competence involves both knowledge and skills, as well as the ability to reflect and engage in critical thinking. It also includes digital judgement, which helps children to participate safely in a digital society. In order to navigate the internet safely, children must be able to distinguish between true and false information, identify risks, detect attempts at fraud, distinguish advertising from other content, and protect their own and others' privacy. They must also be familiar with social rules for online behaviour. Unpleasant experiences or exclusion can limit children's opportunities for participation, and digital technology can adversely impact relationships. The Youth Network points out that digital technology can thereby get in the way of relationships with others.

The ICILS survey maps 14-year-olds' digital competence and algorithmic thinking skills in 34

countries. Norwegian pupils perform above average in digital competence and average in algorithmic thinking. Compared to the 2013 survey, Norwegian pupils' digital competence has declined, as evidenced by more pupils now scoring at the lowest level (an increase from 24 to 40 per cent). The survey also shows that pupils' home background, including socio-economic conditions and access to digital resources, is clearly correlated with their performance.⁴¹

2.3.5 Available services and teaching aids

Digital services must be accessible. Children and young people who require special adaptations, for example, because they have hearing, vision, speech, or reading difficulties, depend on specially adapted programmes, games, and learning tools.

Digital teaching aids are covered by the legislation governing the universal design of ICT. Local school authorities are responsible for conducting the technical and legal assessments of digital solutions. There are a number of requirements for digital teaching aids and other digital solutions that must be met before they can be purchased and used. The Norwegian Authority for Universal Design of ICT monitors digital solutions in the school sector and follows up on breaches of the Regulations on use of information and communication technology (ICT Regulations) by issuing corrective orders. The agency has the authority to impose daily fines if corrective action is not taken within the deadline. In addition, the agency engages in dialogue with suppliers and interest groups to contribute to learning and improvement in the sector.

In 2023, the Norwegian Authority for Universal Design of ICT conducted sectoral inspections of primary and lower secondary schools concerning digital teaching aids. Breaches of the ICT Regulations were uncovered across all solutions.⁴² To strengthen learning and improvement in the sector, inspection results are shared with relevant actors. All inspection reports and analyses are published on uutilsynet.no.

⁴¹ Rohatgi et al., 2024.

⁴² Norwegian Authority for Universal Design of ICT, 2024.

3 Digital development challenges privacy and consumer protection

On the internet, personal data can easily be collected, stored, shared, and sold. Children and young people are particularly vulnerable in relation to privacy, as they often lack the necessary knowledge and experience to protect themselves online. Questions may be raised about children's ability to understand what they are consenting to when they agree to surrender personal data. This is particularly true in contexts where consent is given quickly and without sufficient understanding of what it entails or of the long-term consequences for the child's privacy and rights. Furthermore, children and young people are growing up in a digital, commercial market that challenges their consumer protection. In addition, children are exposed to advertising when they use digital services such as games and social media. In General comment No. 25, the UN Committee on the Rights of the Child has highlighted the risks of violation or abuse of children's rights when children's personal data is processed as part of commercial activities.

3.1 Children's privacy

Data processing when children and young people use digital solutions and social media is a central focus of the Privacy Commission's report, cf. NOU 2022: 11. The Commission notes that the commercialisation of personal data has created strong economic incentives to collect as much data as possible, and children's personal data is often collected on the same scale as that of adults. The Privacy Commission believes that the digitalisation of society has come at the expense of privacy and that a range of privacy challenges affect children's digital upbringing. Children are less capable than adults of managing their own privacy and safeguarding their rights. Younger children especially need protection and guidance from their parents. The use of personal data can contribute to creating or reinforcing unintended biases that can particularly affect vulnerable individuals and groups. Children and young people

are particularly vulnerable because they are more easily influenced by their surroundings and are still exploring their identity. The Government believes that children's personal data should not be subject to commercial exploitation.

Often, it is someone other than the child who makes decisions about how their data will be used. It follows from Articles 5(2) and 24 of the General Data Protection Regulation that all those who process personal data are responsible for safeguarding data protection and complying with data protection legislation. All organisations across the sectors, such as the school and kindergarten sector and the health sector, must independently carry out sound data protection impact assessments. Strong privacy protections are vital for trust in society, and lay the foundation for freedom of expression, freedom of information, and opinion-forming. Having knowledge of people's lives, thoughts, and secrets holds significant power. Uses of personal data include tailoring messages, making decisions based on assumptions about individuals and groups, adapting and pricing products, and developing new services. The right to privacy and data protection is central to ensuring that people can seek information, form opinions, and express themselves without being subject to control or surveillance.

3.1.1 Regulations on children's privacy

The right to privacy is crucial for a safe digital upbringing. Article 102 of the Constitution states that "[e]veryone has the right to the respect of their privacy and family life, their home and their communication" and that: "The authorities of the state shall ensure the protection of personal integrity." Article 104, third paragraph, of the Constitution states that "[c]hildren have the right to protection of their personal integrity". The right to privacy and data protection is enshrined in Article 8 of the European Convention on Human Rights (ECHR) and Article 17 of the UN Convention on Civil and Political Rights (ICCPR). According to Article 8 of the ECHR, everyone has the right to

respect for their private and family life, their home, and their correspondence. Interference by public authorities with the exercise of this right may occur only if the measures are in accordance with the law and necessary in a democratic society. Furthermore, children’s right to privacy and data protection is enshrined in Article 16 of the UN Convention on the Rights of the Child. Children’s right to privacy is also proposed to be highlighted through a new provision in the bill on a new Children Act (Prop. 117 L (2024–2025)). See further discussion in section 6.1.1.

Data protection is regulated in more detail in the Personal Data Act, which stipulates that the EU’s General Data Protection Regulation applies as Norwegian law. The data protection legislation contains few provisions specifically aimed at children, but it follows from recital 38 of the General Data Protection Regulation that children merit special protection, as they may be less aware of the risks, consequences, and safeguards concerned, as well as their rights. They should be particularly protected when personal data is used for marketing purposes, when personality or user profiles are created, and when personal data is collected when they use services offered directly to children.

The General Data Protection Regulation requires that consent must be a “freely given, specific, informed and unambiguous indication of the data subject’s wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her”, cf. Article 4(11). However, children have different capacities than adults to understand and be aware of the risks and consequences of their actions and to know their rights. Therefore, the Personal Data Act requires providers to obtain the consent of parents or guardians for children under the age of 13 to consent to the processing of personal data when using information society services, such as social media, cf. Section 5 of the Personal Data Act. If the child is under the age of 13, parental or guardian consent is required for the processing of the child’s data. In practice, however, the major social media platforms do not have effective solutions for obtaining parental consent.

The right of children to independently consent to the processing of personal data, outside of the use of information society services, is not specifically regulated under the Personal Data Act or the General Data Protection Regulation. Therefore, the main rules regarding children’s capacity to consent in the Guardianship Act, the

Box 3.1 Comments from children and young people: Protection of children’s privacy

The county authorities’ youth councils are concerned with the protection of children’s data protection. They believe that there should be clear guidelines on how their personal data may be collected and used. They propose evaluating existing legislative provisions to ensure that they are effective and sufficient to protect children’s interests on digital platforms. Data protection challenges are a concern that youth councils across Norway highlight as a negative aspect of growing up online. They express a desire to know more about these challenges and to make them a larger part of education in primary and lower secondary schools.

Children Act, and any other special regulations will apply.

3.1.2 Children’s privacy in school

The Privacy Commission points to privacy challenges posed by the dominance of big technology companies in schools and the use of kindergarteners’ and pupils’ personal data for commercial purposes. Many schools and municipalities have limited knowledge of how to protect pupils’ privacy, and the risk of breaches of children and young people’s privacy is therefore high. The Privacy Commission also notes that pupils are exposed to algorithms from commercial actors through the use of digital technology in education. This influences students’ media habits and time management, both during and outside school.

Knowledge and information from schools and local school authorities are necessary for pupils and parents to be able to engage in and participate in decisions about their education. An important prerequisite for the use of digital solutions in the dialogue between parents and the school is that local school authorities have established effective procedures to safeguard the privacy of pupils, staff, and parents. Under the General Data Protection Regulation, kindergartens and schools are obliged to provide data subjects (kindergarteners and pupils) with information about the processing of their personal data. This means that informa-

tion must be provided to parents and, where appropriate, to pupils, depending on the pupil's age. In addition, parents and pupils have the right to access the personal data that is being processed. Parents and pupils also have the right to have incorrect data erased or rectified. This is particularly important for data concerning children with disabilities, who require special adaptations, who have allergies, or who need medication, and for parents' contact details. Information and access are essential prerequisites for parents to protect their children's privacy and for pupils, depending on their age, to safeguard their own privacy. Both the Norwegian Directorate of Education and Training and the Norwegian Association of Local and Regional Authorities (KS) have published guidance for local school authorities and schools on how best to protect the privacy of staff and pupils.¹

There are several requirements for digital teaching aids and other digital solutions that must be met before they can be purchased and used. The requirements for data protection and information security are laid down in law, and assessing the quality of digital solutions also involves considering their legal and technical aspects. It is the responsibility of local school authorities to carry out the technical and legal assessments of digital solutions. Compliance with data subjects' rights is part of all assessments in the procurement process for digital solutions. These are requirements that all data controllers must comply with, and which are intended to ensure that data processing is legitimate and properly founded. In order to strengthen work on data protection, information security, and universal design in schools, the Norwegian Directorate for Education and Training has prepared a report on how best to establish common support services on such matters for local school authorities and schools. The report presents models for the organisation and content of the support services. The Ministry of Education and Research will follow up on the report.

3.2 Children's consumer protection

The commercial influence on children and young people's everyday digital lives has become more personal, complex, covert, and ubiquitous.² This raises the risk of them being exposed to market-

ing that may be inappropriate, harmful, or have an impact on their physical or mental health. Children and young people enjoy special consumer protection, including through provisions of the Marketing Control Act and the Broadcasting Act.

3.2.1 Significant commercial pressure

The Norwegian Media Authority's survey on advertising pressure on children shows that 6 out of 10 children and young people aged 9–18 who use social media feel they are exposed to too much advertising.³ The Ombudsperson for Children's expert group on a safer digital everyday life reported that children might experience commercial pressure from influencers they follow on social media without even realising it.⁴ This could be influencers who advertise various products and services. It may be difficult for young people to know whether influencers are advertising something they like or posting because they are being paid to do so. A Consumption Research Norway (SIFO) report on children and young people's digital competence⁵ summarises previous research findings as follows:

“Influencers promote an entire lifestyle; that is, not just individual products, but a variety of (often luxurious) identity products that convey status. As influencers appear as role models for young people, whom they trust highly and perceive as friends, it is very difficult for young consumers to distinguish between the market and everyday life in this type of commercial relationship, and for young people to realise how they are being influenced and manipulated.”

The young people who participated in consultation meetings in connection with this white paper stated that cooperation between the authorities and the technology industry is necessary, including to develop guidelines and tools that promote a safe online experience for children.

Exposure to overt and covert advertising

A study of what influencers communicate to their followers shows that 45 per cent of posts from the influencers that children and young people most like to follow contain advertising.⁶ For foreign and

¹ KS, 2024; the Norwegian Directorate for Education and Training, 2024b.

² Slettemeås et al., 2023

³ Norwegian Media Authority, 2024e.

⁴ The Ombudsperson for Children, 2019.

⁵ Reich et al., 2022, p. 22.

Norwegian influencers combined, 17 per cent of posts containing advertising are not labelled as such. Foreign influencers post the most covert advertising, while Norwegian influencers are generally good at labeling posts that contain advertising. When it comes to Norwegian influencers, only 15 out of 340 posts containing advertising were not labelled. The Norwegian Consumer Authority participated in a joint European inspection in 2023, which found that 60 per cent of the influencers inspected were inconsistent in their advertising labelling for their own products and services.⁷

Marketing with an impact on health

A 2018 SIFO report found that children in Norway are exposed to significant amounts of advertising for harmful and inappropriate products on social media.⁸ The survey showed that 80 per cent of children have been exposed to gambling advertisements, one in four children have been exposed to alcohol advertisements, and almost half have been exposed to advertisements for plastic surgery or cosmetic procedures. The children state that they would prefer to avoid this type of marketing. During an inspection in the spring of 2023, the Norwegian Consumer Authority, the Norwegian Board of Health Supervision, and the Norwegian Medical Products Agency uncovered extensive illegal marketing on social media by clinics offering cosmetic procedures.⁹

Studies conducted by Retriever for Actis and the Norwegian Cancer Society have shown that there is widespread exposure of children to social media content featuring alcohol, tobacco, and nicotine products.¹⁰ It is not always disclosed whether such content is produced to market the products in question. Positive references to, for example, alcohol, tobacco, and nicotine products, energy drinks, the use of tanning beds, and products for building muscle or bodybuilding can affect mental health and quality of life.

Behavioural advertising

A large amount of personal data is gathered about consumers when they use various digital services. This information is used to create profiles for indi-

vidual consumers or to sort consumers into categories and segments. The SIFO study mentioned above on marketing and data protection in social media showed that the digital marketing children encounter in social media is, to a significant extent, tailored to their personal data such as gender, location, age, ethnicity, and digital activities.¹¹ Since the survey was conducted, the amount of data collected on users has increased, and targeting options have become more advanced.

In NOU 2019: 19 on gender equality challenges among children and young people, the UngIDag Committee writes that stereotypical representations of boys and girls dominate advertising. Massive and highly gender-stereotypical marketing contributes to narrower frameworks for how children and young people develop gender identity and what perceptions they have of what it means to be a girl or a boy. Research shows that girls are exposed to advertising that portrays the ideal as thin, beautiful girls with flawless skin and shiny hair, while boys are exposed to advertising that depicts active, strong, athletic bodies, defined abdominal muscles, and large biceps.¹² Girls are exposed to far more advertisements for beauty and cosmetic products and services than boys.¹³ The UngIDag Committee also believes that marketing can contribute to increased body image pressure. The Ombudsperson for Children's expert group pointed out many of the same things, arguing that unrealistic body ideals in advertising can create pressure. Some of the girls felt that the advertising played on their emotions and insecurities.¹⁴ Behavioural advertising can reinforce this trend by recommending content that is more extreme or harmful than what the user would have searched for themselves.

Schools shall be free of advertising

Children are also exposed to advertising in a school context, including through digital media, apps, and programmes on the school's digital devices.¹⁵ The Privacy Commission's report points out a particular risk that free teaching aids may be funded through advertising. These issues are addressed in the Government's strategy for digital competence and infrastructure in kindergartens and schools, which was presented in 2023. The

⁶ Retriever, 2023.

⁷ Norwegian Consumer Authority, 2024.

⁸ Rosenberg et al., 2018.

⁹ Norwegian Consumer Authority, 2023.

¹⁰ Retriever, 2020; Retriever, 2021.

¹¹ Rosenberg et al., 2018.

¹² Steinnes et al., 2019.

¹³ Rosenberg, 2018.

¹⁴ The Ombudsperson for Children, 2019.

¹⁵ Falch, 2022.

Education Act clearly stipulates that pupils shall not be exposed to advertising that may exert commercial pressure, or that may substantially influence attitudes, behaviour, and values. The Government believes that children and young people should be able to enjoy school as a place where they are free from commercial pressure.

3.2.2 New technology challenges children’s consumer protection

The prevalence of social media used by children and young people has emerged alongside a new business model for internet-based services. YouTube, TikTok, Snapchat, and Instagram, which young people use extensively, are, like most other social media, funded through advertising. The business model is based on the collection of large volumes of personal data, categorisation into interest profiles, and the use of recommender systems. The providers’ revenue streams are directly related to the amount of exposure users receive to advertisements. This means that providers have an interest in users spending as much time as possible on their platforms, and the system being designed for this purpose. The Screen Use Committee points out that when the service is free, the user is the commodity.

Addictive mechanisms

The Screen Use Committee states that social media features and design choices can lead children and young people to spend more time on the platforms than they intend. They believe there is a need to regulate mechanisms of addictive design, such as endless streams of content, infinite scroll, and autoplay, and that the Norwegian authorities should contribute to international efforts in this area. The Norwegian Consumer Council has pointed out that recommendation algorithms can continuously optimise content based on what generates the most engagement on the platform, prioritising addictive, dopamine-triggering content that keeps users scrolling, clicking, and watching. To ensure that users return to the platform, mechanisms such as notifications or streaks are often used.¹⁶

Manipulative design and in-game purchases

Manipulative design can cause users to purchase something they did not intend to buy, or spend more time than they intended. Manipulative design can be found across all online channels, including streaming services, social media, and games. In recent years, in-app purchases, virtual currencies, loot boxes, and so-called *pay-to-win*

¹⁶ Norwegian Consumer Council, 2024.

Box 3.2 Manipulative design, skins, streaks and loot boxes

Manipulative design is an interface or design feature that controls, deceives, or pressures consumers into making choices that are primarily in the interest of the enterprise.¹ There are many forms of manipulative design, for example, when a choice or information is particularly emphasised through placement, size, or colour, or when costs are hidden or do not appear until the end of a purchase.

Skins are cosmetic items in games. Players can give characters or objects in a game new clothes or appearances. This does not affect how they function in the game. Skins can be bought and sold between players, much like collectibles. Some skins are rare and can be valuable, with players spending real money to buy or sell them to other players.

Streaks are used by platforms to create habits, engagement, and continuity. A streak can be

the number of consecutive days two people send pictures to each other, or the number of consecutive days a user is logged into a platform. Breaking a streak means that the accumulated series is reset to zero. Streaks are used in social media, games, fitness apps, and learning apps.

Loot boxes in video games are virtual boxes, a form of surprise package, that can be purchased for real money or virtual currency, or won in-game, and whose contents are unknown until the box is opened. The contents of the box give the player advantages in the game or provide items that serve as cosmetic accessories for the game character. These can be weapons, new skills in the game, skins, or the game’s own virtual currency. Information about the contents and odds of winning is often absent.

¹ Norwegian Consumer Council, 2022b.

mechanisms have become common ways to monetise players. This contributes to more time spent and higher revenue generated from players, as well as algorithms and recommendation systems being increasingly designed with a commercial purpose in mind. *Pay-to-win* mechanisms involve purchasing advantages in the game. Loot boxes are generally not considered gambling and are therefore not covered by the new Gambling Games Act (see discussion in section 9.5.4).

The gaming experience can be tailored so that the player is led into the game shop or gambling-like mechanisms, such as loot boxes, without being able to identify or resist them.¹⁷ Games can incorporate designs that make shopping and consumption seem like play and reward. Children may be more vulnerable than adults to manipulative design.¹⁸

In video games, spending money and gambling-like elements in games can become a problem for young users, as the Screen Use Committee also pointed out in its report. Skins and loot box winnings are examples of video game elements used as deposits and winnings in the unregulated gambling market known as *skin betting*. Several websites that offer unregulated gambling in Norway allow players to use various payment methods as stakes or to withdraw winnings, giving players the choice of which payment method to use to participate in the gambling. These can be ordinary currency, various forms of cryptocurrency, and virtual gaming currency, such as Robux from Roblox or skins, particularly from the video game *Counter-Strike*. There is concern that such websites could act as a recruitment channel for other unregulated gambling sites offering

high-risk games, which might lead to more young players developing gambling problems. See also the discussion of gaming disorder in section 4.2.3.

Humanisation and generative artificial intelligence

Several social media providers and internet platforms offer generative AI solutions as part of their service, such as Snapchat's MyAI chatbot. People can develop friendships with bots, which implies a form of trust.¹⁹ See also the discussion of AI in section 2.2.2. The Norwegian Consumer Council is concerned that humanising user interfaces, in which the service appears as a human being in its interactions with consumers, may challenge children's privacy and consumer protection.²⁰ The Norwegian Consumer Council emphasises the risk of unhealthy emotional attachment, manipulation, data collection about children, and the potential for this to be exploited commercially.

A Danish government-appointed expert group on big technology companies has addressed the issue of children and young people in its latest interim report on limits to the development and use of artificial intelligence by technology giants.²¹ The report makes four recommendations:

- Chatbots should be disabled by default, free of charge, and free from manipulative design.
- The design of AI should take into account children as vulnerable consumers.
- Children and young people must be protected from the use of AI in toys.
- There is a need for a sharper focus on the risks posed by AI to children and young people.

¹⁷ Norwegian Consumer Council, 2022a.

¹⁸ Steinnes et al., 2023.

¹⁹ Brandtzaeg et al., 2022.

²⁰ Norwegian Consumer Council, 2023.

²¹ Ministry of Industry, Business and Financial Affairs (Denmark), 2024.

4 Harmful content and use

Both the content of digital services and how they are used can be harmful to children’s development, their physical and mental health, and their safety. It can also create addictions. Harmful content and use are exacerbated by the fact that most social media platforms rely on recommendations powered by artificial intelligence, machine learning models, and algorithms. In this sense, the platforms are ‘walled gardens’ on the internet, where providers have considerable influence over the content users are exposed to, and also collect and reuse data on users’ interests and behaviour. The platforms have changed the internet from a neutral space to one that offers content tailored to individual users.¹ The platforms are designed to achieve commercial goals of exposure to advertisements and prioritise engaging content in order to maximise time spent on the platform (see also section 3.2). In General comment No. 25, the UN Committee on the Rights of the Child calls on States parties to protect children from harmful and unreliable content and to require relevant enterprises and other providers of digital content to develop and implement guidelines to enable children to safely access a diversity of content.

4.1 Risks

School-age children are particularly vulnerable to social influence, while the risk of such influence decreases in the transition to adulthood.² Through social media, children and young people can seek out and participate in environments that negatively influence them, where it is difficult for adults to identify risks and prevent participation.

The central government has a duty to protect children and young people from harmful content and to help them safely navigate the media landscape. It is a challenge that the legislation does not sufficiently regulate social media. The Act relating to the protection of minors against harmful audiovisual programmes defines harmfulness

based on traditional platforms for the dissemination of moving images, such as cinema and television, and sets rules for age limits on these platforms, among other things. The assessment shall be based on whether the content may be harmful to children and young people below the relevant age limit. The assessment is based on a precautionary principle, taking into account what children in different age groups can tolerate.

When assessing whether something is ‘harmful’ under the Act relating to the protection of minors against harmful audiovisual programmes, it is not a question of concrete evidence of psychological harm, but rather of how the content may affect children emotionally or cognitively. Harmful content may be content that causes fear, discomfort or that conflicts with children’s own norms, such as violence and pornography. The assessment shall also take into account children and young people’s right to information and access to media content. The definitions of harmful and seriously harmful content in the Act are legal standards. The interpretation of these terms may evolve in line with new research on harmful effects and societal norms. See also the discussion of the Act in section 9.2.5.

4.1.1 Exposure to violent content

The Norwegian Media Authority’s 2024 survey on children and media reveals that more than half of young people aged 13 to 18 report seeing violent content at least once in the past year. One third have seen fighting or the planning of fights.³ The survey shows an increase in the proportion who have been exposed to harmful content compared to 2022 and 2020.

In a qualitative study conducted by the Norwegian Media Authority, 11 young people aged 13–15 were asked about the content they found most harmful.⁴ The young people particularly highlighted violent content. This applied in particular to brutal videos of youth violence, though videos

¹ Rasmussen, 2021.

² Monahan et al., 2009.

³ Norwegian Media Authority, 2024e.

⁴ Norwegian Media Authority, 2024i.

of murder, suicide or animal abuse were also mentioned. Several stated that they were often exposed to violence on social media and that it was difficult to avoid, as it was often shared in chats or groups. Almost all of the young people in the survey said they had seen things they wished they had not. Some said they had already come across such content when they were younger. Furthermore, several of the young people in the same survey highlighted that they found ‘exposed’ accounts, or public shaming accounts, to be harmful. These are closed accounts where images and videos are shared, often submitted by the account’s followers. Exposed accounts are mainly used for spreading rumours, vilification, and similar activities, but are also utilised to share pornography and abuse material.

4.1.2 Pornography

It is widely recognised in society that pornography is unsuitable for children. It follows from Section 317 of the Penal Code that anyone who supplies pornography to persons under 18 years of age is liable to punishment. Pornography can be frightening for younger children. For young people, pornography can be a source of exploration and pleasure, but it can also be addictive and influence their thoughts and attitudes towards sex.⁵

In the Norwegian Media Authority’s survey on harmful content (see above), several young people felt that pornography was too readily available on the internet. In its report, the UngIDag Committee points out that pornography can be problematic in terms of stereotypical representations of gender, unrealistic representations of how bodies should look, and sexual acts that can cause stress and pressure to perform. At the same time, the Committee emphasises its concern that there is very little knowledge about younger children’s sexual media practices, such as how early children seek out and are exposed to pornographic and other sexual content online. The Social Media Harms Committee, cf. NOU 2021: 3, noted in its report that children’s exposure to sexual and pornographic content often raises concerns among adults. Pornography with aggressive, offensive or violent elements can have a negative impact on attitudes and sexuality, especially for boys, and lead to problematic and harmful sexual behaviour.⁶ A study covering five European coun-

tries, including Norway, found a correlation between regular use of pornography among boys and gender-discriminatory attitudes or a tendency to sexually objectify women.⁷ Young people who are more exposed to pornography are more likely to engage in sexual harassment of their peers than young people who are less exposed to pornography.⁸ Young people themselves also point to pornography as a possible contributing factor to the extent of sexual harassment among young people.⁹ In its concluding observations on Norway’s tenth periodic report, the UN Committee on the Elimination of Discrimination against Women noted with concern reports of an increase in cases of sexual abuse of teenage girls by teenage boys and the possible link to the sexualisation of women online and the availability of pornography.¹⁰

4.1.3 Bullying, vilification, and harassment

The internet provides children and young people with greater opportunities to express themselves, but it also increases the risk of them either exposing others to, or becoming victims of, bullying, vilification, and harassment.

Bullying

The 2023 Pupil Survey showed that 3.8 per cent of Year 7 pupils had experienced digital bullying in recent months. This marks a doubling since 2017.¹¹ The Government has taken several measures to create a good and safe learning environment that promotes learning, for example, through a clear professional recommendation from the Norwegian Directorate for Education and Training to ban mobile phones. The survey on questions for Norwegian schools and school leaders conducted in the spring of 2024 shows that 96 per cent of schools now have some form of such regulation.¹² See also the discussion of mobile-free schools in section 7.4.

⁵ Norwegian Resource Centres on Violence, Traumatic Stress and Suicide Prevention (RVTS), n.d.

⁶ Norwegian Directorate of Health, 2021.

⁷ Stanley et al., 2018.

⁸ Bendixen et al., 2016.

⁹ The Ombudsman for Children, 2018.

¹⁰ UN Committee on the Elimination of Discrimination against Women, 2023.

¹¹ Norwegian Directorate for Education and Training, 2023b.

¹² Bergene et al., 2024.

Box 4.1 Cyberbullying

The Pupil Survey defines bullying as repeated negative actions by one or more individuals towards a pupil who may find it difficult to defend themselves. Bullying may involve calling someone hurtful names, teasing, excluding them, talking behind their back, hitting, pushing, or restraining them. Cyberbullying has brought new dimensions to bullying. Cyberbullying can further exacerbate power imbalances, where the victim might not know who is perpetrating the bullying. At the same time, a greater number of people might become aware of the bullying. This can lead to significant uncertainty. A comment, message or image can be repeatedly displayed and shared with many people. Furthermore, cyberbullying or digital violations do not only occur during the school day, but they can also persist once the school day has ended, leaving the victim with no relief from the bullying.

Vilification and harassment

The internet provides children and young people with greater opportunities to express themselves, but it also increases the risk of them becoming victims of vilification and harassment. In the Norwegian Media Authority's 2024 survey on children and media, 11 per cent of children and young people report that they often receive hurtful comments while playing video games. Of these, 22 per cent state that it upsets them. Seven per cent state that they are often excluded from games by their friends.¹³ Many websites provide options for reporting, blocking, muting, or banning other users. These can be useful tools for preventing bullying and ending unwanted encounters. At the same time, they can be exploited for unwarranted exclusion and bullying. It may be easier to exclude someone digitally than face-to-face, but that does not necessarily make it any less painful for the person being excluded.

Members of Dyslexia Youth (part of Dyslexia Norway) have commented that dyslexia becomes highly visible in the form of spelling mistakes in comment sections, and many experience being commented on and bullied because of this. Mem-

bers of the Sámi Pupil Forum, who have provided comments in connection with the work on the white paper on Sámi language, culture and community life – public health and living conditions in the Sámi population (Meld. St. 12 (2023–2024)), have reported instances where Sámi children have made mistakes in Norwegian and been vilified and bullied because of this.

A larger proportion of 16–24-year-olds have experienced vilifying or derogatory comments online than other age groups in the population. Of these, 32 per cent in the 16–24 age group say they have become more cautious about participating in debates and discussions online.¹⁴ In its report, cf. NOU 2022: 9, the Freedom of Expression Commission states that it considers it a “clear and worrisome trend where vulnerable minorities in society are subjected to considerable harassment when expressing themselves in public”.

Box 4.2 Cyberhate against Sámi people

The matter of wind farm development in Fosen, Trøndelag, is an example of a debate that has generated cyberhate. A report by Amnesty International Norway¹ shows that negative comments about Sámi people increased by almost ten per cent as a direct result of the discussions on the matter. Sámi youth have also reported vilification and hate speech online and on social media, which makes it difficult for them to be open about their identity, cf. the white paper Meld. St. 12 (2023–2024). They want more positive Sámi stories in the media to reduce vilification and improve understanding and acceptance of Sámi culture. The action plan against vilification and discrimination of Sámi people (2025–2030), presented by the Government in 2025, addresses vilification and hate speech against Sámi people on social media. The action plan contains a total of 32 measures to prevent and combat racism and discrimination against Sámi people, and includes several measures aimed specifically at children and young people.

¹ Analysis & Figures, 2023.

¹³ Norwegian Media Authority, 2024c.

¹⁴ Norwegian Media Authority, 2022.

Sexual harassment

There is limited knowledge about how sexual harassment impacts children and young people, but some studies suggest that it restricts young people's access to social arenas. Digital sexual harassment among young people is widespread. In the gaming world, girls in particular face sexual harassment, homophobia, and gender stereotypes. This may be one reason why young people withdraw from gaming and are deprived of the opportunity to engage in an activity they enjoy.

The Government has presented a white paper on sexual harassment (Meld. St. 7 (2024–2025)). The report defines seven goals for the work against sexual harassment going forward, several of which are aimed at young people. Among other things, the Government is working to ensure that schools, education, culture and leisure activities, sports, voluntary work, and everyday digital life are free from sexual harassment. The white paper also points out that more knowledge is needed about the social contexts in which digital sexual harassment occurs, how young people themselves can contribute to preventing violations, and what they consider to be acceptable sexual communication.

The Youth Network points out that parts of online culture are characterised by a harsh and sometimes discriminatory culture. The Youth Network believes it is important to take action against online harassment and hate, including in gaming culture and the tone of public debate.

Queer Youth have commented that many queer people find a community online, but are also exposed to cyberhate and threats. Vilification and hate speech are forms of discrimination and can prevent children from participating digitally.

The UN Committee on the Elimination of Discrimination against Women¹⁵ is concerned that young women are subjected to gender-based hate speech online. The Committee has established that violence against women, including sexual harassment, occurs in all spheres where people interact, including on the internet and in other digital contexts.

4.1.4 Misinformation and disinformation

The internet is a great source of information, but also an arena for misinformation and disinformation, which the Freedom of Expression Commis-

sion considers to be a major challenge today, cf. NOU 2022: 9, page 18:

“The Commission believes the scale of disinformation that has been uncovered in several countries is cause for concern and increased vigilance in Norway as well. At the same time, it is important to remember that Norway is relatively well-equipped. Compared to many other countries, Norway's polarisation is not considerable, its media system is robust and trusted, and the critical media understanding is strong. These are some of the factors that studies have found to be of major significance in terms of how vulnerable a country is to disinformation.”

The Norwegian Police Security Service (PST) warns against attempts at influence operations, particularly from Russia and China. Such operations may seek to change perceptions, create divisions or sow mistrust. Influence operations are often carried out using disinformation and half-truths that are spread rapidly through social media. Disinformation and misinformation particularly affect children and young people because they may find it difficult to distinguish truth from falsehood online. The most common way for children to get their news is from social media.¹⁶ Therefore, this group is more exposed to disinformation and fake news. In a survey conducted by the Norwegian Media Authority, 68 per cent of those aged 16–24 responded that they had come across false information in the past year.¹⁷

4.1.5 Radicalisation

In its National Threat Assessment for 2025, the Norwegian Police Security Service (PST) highlights that an increasing number of children and young people in Norway are becoming radicalised, particularly through digital platforms. PST notes that digital platforms and digital networks are the main arenas for radicalisation and recruitment to extremism, with an increased spread of extremist content on popular commercial platforms. PST also observes a negative trend whereby more young people are consuming violent content online. This increases the risk of radicalisation and recruitment to extremism among young people in Norway. PST raises concerns that some individuals might escalate extreme views into acts of terrorism.¹⁸

¹⁵ UN Committee on the Elimination of Discrimination against Women, 2023.

¹⁶ Norwegian Media Authority, 2023a.

¹⁷ Norwegian Media Authority, 2024j.

In NOU 2024: 20, the Commission on Extremism pointed out that extremists use the extensive reach of gaming platforms and gaming culture for recruitment, spreading propaganda, mobilisation, and violence. Minors in Norway take part in both open and closed, national and transnational extreme digital networks. Much of the extremist propaganda in these networks is designed and distributed to appeal to younger audiences. Algorithms in web searches and social media can quickly lead users to more extreme content. Minors who are drawn to such networks and propaganda may have challenges that make them vulnerable and thus easily receptive to extremist messages. Children generally have a lesser understanding of consequences than adults. In March 2025, the Government presented the white paper *Prevention of extremism – Safety, trust, cooperation and democratic resilience* (Meld. St. 13 (2024–2025)).

4.2 Health consequences of screen use

Children and young people spend considerable time in front of screens, both at school and in their leisure time. There is general concern about how this may affect their health. However, little is known about the health consequences of such screen use.

4.2.1 Screen use and child development

Children are surrounded by screens from a very early age, both because of their parents' screen use and as users themselves. There is little knowledge about the consequences of such screen use, but there are some indications that screens have an adverse impact on young children's neurodevelopment and that children with low socio-economic status are more affected by serious, harmful screen use. In its report, the Screen Use Committee states that socio-economic context, among other factors, may play a role in how screen use affects children. It is important to be cautious about drawing definitive conclusions, but some researchers recommend a precautionary approach.¹⁹

Consequences of early screen use

In the first years of life, the brain is particularly receptive to influence. When screens compete

with other necessary activities, such as play, sleep, and interaction with adults, this can disrupt the development of language, soft skills, and emotion regulation. Research shows, among other things, that there is a link between using mobile phones to calm children down and emotional regulation difficulties.²⁰ In addition, links have been found between early screen use and delayed language development, fewer language exchanges between children and caregivers, and difficulties with social interaction.²¹ A link has also been documented between screen use and an increased incidence of attention difficulties, learning difficulties, and symptoms of neurodevelopmental disorders such as ADHD and autism spectrum disorders. Children from low socio-economic backgrounds appear to be particularly vulnerable to the negative consequences of screen use. However, the causal relationships are uncertain.²²

Parents' screen use

In 2022, the Norwegian Institute of Public Health summarised international studies on parents' screen use in interaction with children aged 0 to 6 years.²³ The results provided some support for caution regarding screen use when interacting with children, but nevertheless concluded that it is difficult to draw conclusions about the consequences of screen use. In 15 of the studies, nine showed increased stress and negative emotions in children, as well as lower sensitivity and responsiveness in parents, and poorer overall interaction in the group where parents used screens, compared to the group where they did not. In five naturalistic observational studies of interaction situations in playgrounds, cafés, and similar settings, the authors reported some correlations between mobile phone use and poorer responsiveness, although other factors may also influence the results. The Department of Psychology at the University of Oslo investigated infants' reactions to their caregivers' reduced responsiveness caused by mobile phone use. After just one minute, the children showed reduced positive engagement and increased negative behaviour, leading to stress and discomfort. This is the same as what was observed in the *Still-Face Effect*, where the caregiver stares rigidly through the child without modulating their gaze.²⁴

²⁰ Coyne et al., 2021.

²¹ Brushe et al., 2024.

²² Lunde et al., 2025.

²³ Nøkleby et al., 2022.

¹⁸ Norwegian Police Security Service, 2025.

¹⁹ Tryti et al., 2024.

In its 2024 knowledge review, the Public Health Agency of Sweden refers to a study from the United States showing that parents' use of mobile devices can have a negative impact on children's mental health.²⁵ Mobile phone use can lead parents to become less attentive to their children's needs. According to the Screen Use Committee, frequent mobile phone use, especially when it leads to reduced attention and interaction with children, may negatively affect children's well-being and sense of belonging.

In its research review, the Screen Use Committee found no strong negative correlations in the research between screen use and young children's development. However, the Committee emphasised that when parents look at screens rather than at their children during play and interaction, this can have an immediate negative impact on interaction. What children do and watch on screens, and whether they do so with an actively participating adult, seems to have a significant impact on how screen use affects children. Nevertheless, it is uncertain how this affects children's development and attachment in the long term. The Committee stated that, although the research does not provide clear results, there is reason to be cautious about screen use around young children. Much more research is needed, but from a precautionary perspective, there is every reason to exercise caution and for caregivers to be aware of the possible negative consequences for interaction with children.

4.2.2 Screen use and mental health

The Screen Use Committee highlights that certain trends are heading in the wrong direction, including a rise in self-reported mental health problems and a decline in school performance observed in various studies in recent years. At the same time, the Committee points out that screen use is not the only factor affecting the well-being of children and young people. There has been a rise in mental health problems among children and young people over the past decade, especially among girls, and questions have been raised about whether there is a connection between screen use and poor health.²⁶ However, the results of studies are not conclusive²⁷, and there is limited knowledge about the causes of the

increase in mental health problems among children and young people.

Many young people have reported increased body image pressure and low self-esteem from encountering a filtered reality on social media.²⁸ It is likely that body image pressure can contribute to low self-esteem and mental health problems, but relatively few Norwegian studies have so far been able to clarify the causal relationships. International studies conclude that limiting time spent on social media may be preferable, but recognise that this is difficult. Therefore, researchers recommend increasing young people's knowledge and awareness of the negative consequences of using social media so that they limit their own use.

A study by the Norwegian Institute of Public Health shows that young people who experienced negative events, such as receiving unwanted attention from strangers, being sent naked images against their will, being excluded from groups, or receiving negative comments on their posts, had a higher risk of symptoms of anxiety and depression.²⁹ Another study from the Norwegian Institute of Public Health shows that young people who frequently feel that others are monitoring them on social media to see what they are doing, where they are, or who they are with, also display symptoms of anxiety and depression more often than their peers.³⁰

The Social Media Harms Committee reviewed research on social networking services and mental health and found that it was difficult to provide clear answers about the consequences of these on the mental health of children and young people. The Screen Use Committee states that time spent on social media has a weak, negative correlation with mental health. They believe it is difficult to say why, and that the correlations are complex. Who you are, what media you use, what content you view, and other factors probably play a role. Among other things, they note that teenage girls and children from lower socio-economic backgrounds may be more vulnerable.

Algorithms that increase exposure to harmful content can have negative effects on children and worsen mental health problems. Such algorithms may contribute to selective exposure of content to users. According to Amnesty International, for example, TikTok's algorithms increase the exposure of children with mental health challenges to

²⁴ Tidemann et al., 2022.

²⁵ Public Health Agency of Sweden 2024a.

²⁶ Bang et al., 2024.

²⁷ Giske et al., 2024.

²⁸ Eriksen et al., 2017.

²⁹ Skogen et al., 2023.

³⁰ Finserås et al., 2023.

Box 4.3 ABC for good mental health

The public health campaign *ABC For Good Mental Health* provides tools to offset the negative effects of screen use and social media presence and to strengthen important relationships in life. The aim of the campaign is to increase people's knowledge of what strengthens mental health and what each individual can do to look after their own mental health. The campaign is based on three approaches: doing something active, doing something together with others, and doing something meaningful. Trøndelag County Authority has tested a pilot project, and the Norwegian Directorate of Health is responsible for implementing the campaign. The campaign will be embedded in each county, while the Directorate will implement national information measures to support the counties' implementation. The campaign targets kindergartens, schools, and workplaces, among other places, and aims to inspire people to make active choices for their mental health. In 2025, NOK 25 million has been allocated for this purpose.

content about self-harm and suicide.³¹ Research shows that young people who struggle with self-harm or suicidal thoughts often use the internet, both in constructive ways – such as seeking support and coping strategies – and in ways that can be harmful. The internet can contribute to normalising self-harm, preventing openness and professional help, and exposing young people to violent methods of self-harm and suicide.³²

4.2.3 Ambivalence about disconnecting

Children and young people express that online use can become excessive. Both the youth councils and the Youth Network report that some children experience fatigue from being constantly connected; however, society's infrastructure makes it impossible for most to disconnect. About three in ten children and young people wish they could log off more often.³³ The Youth

Network believes there should be clear rules about when the school expects pupils to be accessible.

Because young people are at a stage in their lives where they are developing their identity alongside their peers, it can be particularly challenging for them to balance the time they spend on social media with other needs. Much of their contact with peers takes place on social media, and they may therefore feel a fear of missing out when logged off. Research shows that young people have ambivalence about disconnecting: on the one hand, they are expected to regulate their own screen use, while at the same time they experience clear expectations that they should be connected and present. Digital media reinforce this ambivalence by providing a sense of freedom alongside the pressure to be constantly digitally present.³⁴

Young people who use social media in moderation report fewer mental health problems on average compared to those who spend more than three hours a day on social media.³⁵ At the same time, some research shows that the correlation between screen use and life satisfaction, or risk behaviour, sociality, or physical activity is not straightforward.³⁶

The Norwegian Directorate of Health advises that children under two should not use screens, and that children aged two to five should have limited screen use. For those aged 6–17, the Directorate recommends limiting sedentary time, especially passive screen use, during leisure time.³⁷

Gaming disorder

Video games are an important and rewarding part of everyday media life for many children and young people. For some, however, gaming can become all-consuming and problematic. Previously, concerns about gaming mainly centred on the content of games – whether gaming made players more violent or aggressive. Now, the main concern is how much time gaming consumes. In the Government's action plan on problematic gaming (2022–2025), children and young people are given special priority. Among other things, the action plan refers to the prevention campaign *Snakk om spill* (talk about games), which aims to prevent gaming-related problems among children

³¹ Amnesty International, 2023.

³² Daine et al., 2021.

³³ Norwegian Media Authority, 2024e.

³⁴ Agai, 2022.

³⁵ Eriksen et al., 2017.

³⁶ Bakken et al., 2024; Milosevic et al., 2022.

³⁷ Norwegian Directorate of Health, 2019.

and young people. The campaign is aimed at parents, relatives, and adults who work with children. The campaign also provides information about the grey areas between gambling and video games. The action plan includes measures to strengthen research, knowledge, and skills in the services and to further develop the available treatment options.

Gaming disorder is characterised by impaired control over gaming, increasing priority given to gaming over other activities to the extent that gaming takes precedence over other interests. Furthermore, gaming disrupts school, family, career, and social life. It is also characterised by a continuation or escalation of gaming despite the occurrence of negative consequences. Young people in upper secondary education and training, or students in particular, may have problems managing the amount of time they spend gaming. Younger children are typically supervised by the adults around them, but as they grow older, they are granted more independence. The Screen Use Committee points out that, in some instances, young people drop out of school or higher education and devote most of their time to gaming. See also the discussion of addictive mechanisms and design, which also applies to games, in section 3.2.2.

Children and young people who struggle at school may experience low self-esteem, lack of motivation, and social isolation. For some, video games can become a space where they experience accomplishment, a sense of belonging and social contact. Video games provide an opportunity to develop skills and achieve goals. Games include several social elements, such as forming friendships and collaborating with other players, which can counteract feelings of isolation. Gaming offers both benefits and drawbacks for children and young people.

In a population study carried out by the University of Bergen in 2022, 0.7 per cent of the 16–74 age group are classified as having a gaming disorder, while five per cent are described as exhibiting problematic gaming behaviour. This is a slight decrease from 2019. The occurrence of gaming disorder or problematic gaming behaviour is over-represented among men. A total of 8 per cent of men fall into one of these categories, compared with 3.2 per cent of women. In the youngest age group, 16–26 years, 16.8 per cent are classified as having a gaming disorder or exhibiting problematic gaming behaviour.³⁸

³⁸ Pallesen et al., 2023.

5 Violence and crime on the internet

Rapid technological developments provide criminals with new tools, means, and methods. When criminals use digital tools and new platforms, crime can be more difficult to detect. In an increasingly digital world, specific forms of crime are evolving as well. This includes various forms of sharing of illegal content, digital violations such as sexual harassment, sexual assault or sexual abuse and exploitation. The extent of digital sexual abuse of children and young people is significant and growing.

5.1 Digital violations

A report on digital sexual abuse against children and young people shows that almost one in three girls and one in ten boys have received unwanted requests to discuss sex online or via mobile phone, or to perform sexual acts.¹ Child victims are often afraid to tell their family and friends about such incidents. In cases that reach the courts, the victims have, in many instances, themselves performed the acts on which the conviction is based, which adds an additional layer of shame. The report also states that many victims have reported low mood, sleep issues, concentration problems, self-esteem issues, and anxiety following the abuse. Some have also developed post-traumatic stress disorder, depression, or begun self-harming.

A survey conducted by the Norwegian Media Authority in 2024 shows that 22 per cent of children aged 13–18 have received unwanted sexual comments online in the past year.² Among pupils in upper secondary education and training, 24 per cent have experienced at least one form of digital sexual violation, and in Oslo, 34 per cent of young people have experienced this. Violations include unwanted sexual comments, images, rumour spreading, sharing or threats to share naked images, and pressure to send sexual images or participate in digital sexual acts. Girls report experi-

encing digital sexual harassment more frequently than boys, while young people with parents born outside Europe report such experiences less often. Experiences of digital sexual violations tend to rise with age and are most frequently perpetrated by peers.³ Online habits, such as time spent on mobile phones and social media, sexting, and communicating with strangers online, influence the risk of being exposed to unwanted sexual attention on digital media.⁴

5.2 Sexual abuse

Digital solutions can significantly exacerbate online sexual abuse of children and the sharing and distribution of abuse material.⁵ Gaming and social media platforms have broadened the opportunities for perpetrators to interact with children. Digital solutions also enable sharing large volumes of material. In recent years, there has been a significant increase in the number of online sexual offences against children and young people. Figures from the National Crime Survey show that around seven per cent of young people aged 16 to 19 were subjected to digital sexual violence in 2022. There are notable differences in vulnerability, affecting 12 per cent of women and 2.6 per cent of boys in that age group.⁶ In this report, digital sexual violence refers to the taking, sharing, and streaming of images and videos against a person's will, threats to do so, and being forced to perform sexual acts over the phone or the internet.

In 2021, one in four reports of sexual assault involving children under 14 and 11 per cent of reports of sexual intercourse with children aged 14 to 16 involved digital abuse. A report from Statistics Norway (SSB) on cases concerning sexual offences in the judicial system reveals that digital tools were used in approximately 30 per cent of all

¹ Hellevik et al., 2023.

² Norwegian Media Authority, 2024e.

³ Frøyland et al., 2023.

⁴ Norwegian Media Authority, 2024e.

⁵ Dorotic, 2023.

⁶ Løvgren et al., 2023.

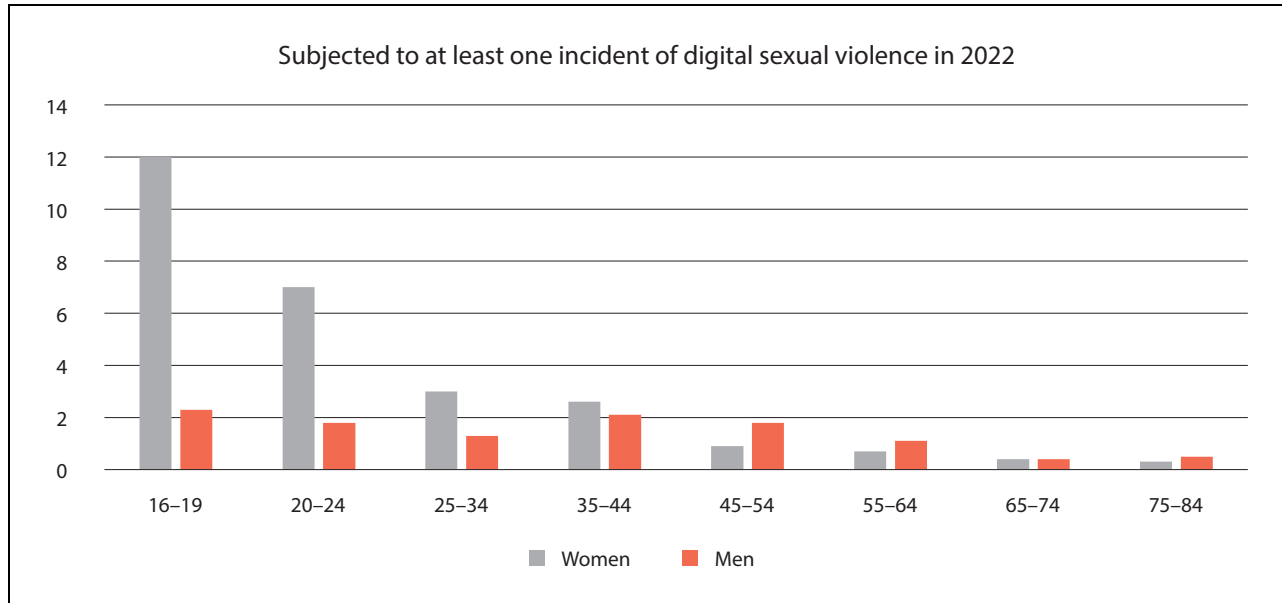


Figure 5.1 Victims of digital violence by age

Source: Løvgren et al., 2023, p. 58

sexual offences against children and young people reported to the police between 2010 and 2022. However, a large proportion of abuse cases are not reported to the police, and it is believed that there are significant numbers of unreported cases of digital abuse against children. The UEVO Study on Childhood Experiences of Violence and Abuse showed that among the young people who had been subjected to sexual abuse, only ten per cent responded that the abuse had been reported to the police.⁷ When the abuse was committed by a peer, only two per cent was reported to the police. A survey of 508 people who had experienced sexual abuse as children revealed that, on average, 17 years had passed between the first time they were abused and the first time they told someone about the abuse. Fear and guilt are among the reasons why victims do not talk about what they have experienced.⁸

The number of tips from internet service providers about child sexual abuse has also increased. In the United States, these companies report to the National Centre for Missing and Exploited Children (NCMEC). In 2022, NCMEC received over 80 million tips about child sexual abuse in the form of images and videos. In 2023, the number had more than doubled. In 2023, the National Criminal Investigation Service (Kripos) received more than 13,000 NCMEC tips regarding

Norwegian nationals, and the number has increased each year since 2019. The tips include young people who download or share abuse material. The content reported varies, from relatively innocent videos and images taken by children of themselves to documented sexual assaults committed by Norwegian perpetrators. However, most tips concern various forms of abuse material, including uploading, downloading, sharing, possession, or other activities.

Digital solutions provide anonymity to perpetrators or make the identification of digital material difficult.⁹ These solutions allow perpetrators to mask their identities and the digital traces of their activities, for example, through VPN connections, the dark web, end-to-end encryption, and cryptocurrency payments, to prevent the police from identifying them. At the same time, digital solutions that identify digital fingerprints of abuse material (known as *hashes*), and machine learning solutions that make it possible to identify new abuse material, represent the most important countermeasures against online child sexual abuse. According to the report, the use of technology that enables rapid searches of large volumes of data is the only way forward to counter the scale and technological advances in the distribution of abuse material.

⁷ Hafstad et al., 2019.

⁸ Steine et al., 2017.

⁹ Kripos, 2023.

Box 5.1 AI-based crime

Artificial intelligence (AI) may result in increased exposure of children and young people to crime. AI can be used, among other things, to produce fake naked images, which can then be used for extortion purposes, both for financial gain and to pressure children into sending sexualised images and videos of themselves. In addition, such fake naked images can be spread by peers, for example, as a form of bullying. A concerning development is the use of what is known as *deepfake* technology, where AI is employed to manipulate images and videos to make it appear as if children are involved in sexual acts – without this actually occurring. Such manipulated media can be difficult to recognise as fake. AI can also be used to tailor communication with children and create realistic but fake content on social media. In this way, AI broadens opportunities for exploitation and enables more children to be exposed to digital sexual abuse, as language barriers are removed and highly credible content is presented to children.

Digital platforms also enable live-streamed, ordered abuse, where buyers in one country order sexual abuse of children to be live-streamed from another country via video online. In 2024, Kripos reported that between 400 and 2,000 Norwegians had probably purchased live-streamed ordered abuse over the past year. The people who purchase live-streamed ordered abuse are almost exclusively men. Live-streamed ordered abuse is sold from several continents and countries, but a disproportionate amount of such offences take place in the Philippines.

Sexual extortion for financial gain

The police are reporting an increasing number of cases of sexual extortion for financial gain.¹⁰ Such offences are often carried out by professional criminal actors located in other countries. Among other things, well-organised global contact centres have been uncovered. The extortion takes place through the use of fake accounts, where a

person is tricked into taking naked images or filming themselves while performing sexual acts. The person is then pressured to pay to prevent the perpetrator from sharing the material with, for example, friends, family, or followers on various social media platforms. The majority of those who are subjected to sexual extortion for financial gain are boys and young men between the ages of 15 and 25; however, girls have also been targeted. The extortion takes place on most social media platforms where young people are active. Snapchat, Instagram and Discord are the most commonly used platforms.

Human trafficking

Children and young people can be exploited for prostitution or other sexual services through human trafficking. Sexual services refer to the sexual exploitation of children and young people for one's own or others' benefit. They may be coerced, exploited, or deceived through digital platforms. Under the Penal Code, exploiting children for sexual purposes is considered human trafficking, even if no violence or threats are used, the child's vulnerable situation is not exploited, or other improper behaviour is not employed. Children and young people may be vulnerable to recruitment on various internet platforms, especially social media. The exploitation itself may take place both online and offline.

Human trafficking is a serious crime and an attack on fundamental human rights. Exploitation in human trafficking has a severe impact on victims, and human trafficking targeting children is particularly serious. In May 2025, the Government presented a national strategy against human trafficking 2025–2030.

5.3 Sharing of illegal content

The police report a trend whereby children and young people are increasingly sharing more extreme content on social media. Such content includes both sexually explicit material and videos depicting violence. The sharing occurs rapidly and on a wide scale, and the consequences for the victims can be very serious. Both boys and girls share sexualised material, but boys do so more frequently. Those who exchange such content often know each other, for example, through school. In several cases, those who shared sexualised material filmed it themselves and also appeared in the material. In the past year, the

¹⁰ Kripos, 2023.

police have also reported that several girls have had ordinary images converted into naked images using AI-based mobile applications, and that such material has been forwarded to others. In these cases, too, it is usually young people who know each other through school, and the distribution is mainly local.

As a general rule, it is a criminal offence to take, possess or share naked images or videos of anyone under the age of 18. In exceptional cases, the penalty may be waived if the boy or girl has a naked image of someone who consents to them having the image. This could, for example, be a boyfriend or girlfriend, provided they are of similar age and development, and the person depicted is over 16 years of age. In any case, it is prohibited to share such images with others.

The police have found that many young people are unaware of the legislation governing such acts and do not know where the boundaries lie. Only afterwards do they realise that they have no control over what they have shared – and by then it is usually too late. Naked images and sex videos shared online are difficult to remove. Knowing that a naked image of yourself is being spread online is a heavy burden, especially for children and young people.

In December 2023, the Government presented a draft resolution on violence and abuse against children and violence in close relationships (2024–2028) (Prop. 36 S (2023–2024)). The plan aims to enhance prevention and protection, identify more cases, and provide better care for victims. The police's preventive actions, investigations, and criminal prosecutions are central to the plan. The investigation of internet-related abuse of children will be strengthened, and minors under the age of 16 who are suspects in sexual abuse cases will be interviewed at government children's houses (multidisciplinary centres for child victims and witnesses of violence and abuse).

5.4 Negative social control and honour-related violence

Honour-related violence is a form of violence triggered by the family's or group's desire to protect or restore its honour and reputation. This occurs in families and groups where individuals are expected to conform and where patriarchal norms regarding honour are strong. Honour-related violence may include negative social control, forced marriage, threats, ostracism, and other psychological violence, physical violence, and murder.

Negative social control comprises various forms of supervision, pressure, threats, and coercion exercised to ensure that individuals live in accordance with the norms of the family or group. Negative social control can be exercised by preventing or controlling access to the internet. A report by Proba samfunnsanalyse, prepared for the Directorate of Integration and Diversity (IMDi), shows that digital negative social control is largely exercised through control over the digital devices of victims, or by gaining access to profiles and messages.¹¹ The report shows that social media can be used as a tool for surveillance and control, and that the consequences of negative digital social control can be serious. At the same time, the report cites studies showing that social media can also serve as a tool for liberation for those living under such restrictions. In May 2025, the Government presented the action plan *In Charge of Your Own Life – Strengthened Efforts against Negative Social Control and Honour-Motivated Violence 2025-2028*.

5.5 Purchase and sale of drugs

The buying and selling of drugs occurs on social media. A survey shows that 33 per cent of 13 to 18-year-olds have encountered content about the sale of drugs online one or more times in the past year.¹²

There has been an increase in the use of nitrous oxide for recreational purposes in European countries since 2010.¹³ There are several websites aimed at Norwegian customers, with pages in Norwegian, delivery available to Norway, and information provided on the regulations for buying and possessing nitrous oxide in Norway.

The Ministry of Health and Care Services has circulated proposals for consultation to ban the recreational sale of nitrous oxide, prohibit the sale of nitrous oxide to those under 18, limit the amount that can be sold to a consumer daily, require suppliers to monitor compliance with sales restrictions, and impose the same age and quantity restrictions on imports.¹⁴

The easy accessibility of drugs online also poses a challenge for child welfare institutions, where employees feel they have little control over what children do on social media and what they

¹¹ Proba samfunnsanalyse, 2022.

¹² Norwegian Media Authority, 2020.

¹³ EMCDDA, 2022.

¹⁴ Ministry of Health and Care Services, 2024.

are exposed to. Employees are calling for updated legislation to address these challenges.¹⁵ A lack of insight into and control over the digital communication or activity of children living in institutions can mean that children and young people do not receive the care and protection to which they are entitled. In Prop. 83 L (2024–2025), the Government proposed amendments to the Child Welfare Act. The bill includes a proposal to make it a legal requirement that, if there is reasonable suspicion that a child is being exposed to danger or harm through the use of electronic communication, the institution can decide to access the child's communication. In addition to the requirement of reasonable suspicion that the child is exposed to danger or harm through the use of electronic means of communication, there is a requirement that access is a necessary measure to provide the child with proper care, protection, and treatment. A clear legal basis will reduce ambiguity for employees at institutions, children, and parents regarding when the institution can demand access to the child's electronic communications. See also the discussion of child welfare services in section 8.1.

5.6 Recruitment to crime

Children and young people are not only victims of crime, they can also be perpetrators. Children and

young people are recruited into crime via digital platforms, including to perform services for others. This may include drug-related offences, theft, or other acquisitive crimes. They may have been coerced, exploited or tricked into the situation, and in some cases, this can be considered human trafficking. Exposure to and sharing of, for example, violent videos or sexualised images can contribute to the normalisation of such acts. The Police Threat Assessment for 2024 indicates that in the battle for market share and territorial control in Sweden, criminal networks have deliberately used inexperienced young people below the age of criminal responsibility to commit murder and other serious acts of violence. Recruitment has taken place on social media and encrypted communication platforms, including criminals using social media to show off and boast about their gains. Criminal networks post violent acts for tender on digital platforms, and the assignments are carried out by young perpetrators. Vulnerable children and young people may be susceptible to recruitment and exploitation for criminal activities. The Norwegian police have long expressed concern that young Swedish nationals are travelling to Norway to commit acts of violence, but so far, no such targeted recruitment of Norwegian children to carry out acts of violence has been observed.

¹⁵ Minde, 2021.

Part III

*The Government's goal for a safe, active
and participatory upbringing*

6 Parents shall be knowledgeable about their children's everyday digital lives



Figure 6.1

Parents are responsible for ensuring a safe environment for their children in their everyday lives. It is a challenge that children, even at a very young age, explore the internet on their own and are left to process content and usage that they are not necessarily mature enough to understand. Artificial intelligence and algorithms mean that children and young people are increasingly moving into digital arenas without their parents being there to guide them and set boundaries. Another challenge is that screen time detracts from other daily activities. Parents' screen use can also have consequences for children, both in terms of parent-child interaction and in safeguarding children's privacy, when adults share images and other information online.

The Government's goal is for parents and caregivers to actively participate in children's everyday digital lives. This is crucial for the child's quality of life and development, and to protect them from the negative aspects of screen use. Parents are the most important people when it comes to looking after their children's interests and needs. Good information, advice, and guidance will help

parents become knowledgeable about and involved in their children's internet use, while recognising their responsibilities as parents and making informed choices in the best interests of the child. Parents' care for their own children is a prerequisite for achieving other goals, such as protecting children in the digital society, facilitating their participation, and ensuring their involvement. For the purposes of this paper, *parents* include both parents and caregivers of children.

The Government will:

- Strengthen the dialogue with parent councils on the use of digital technology in kindergartens and schools and in cooperation with homes, including considering measures to support schools and parents' working committees in their efforts to create a safe digital everyday life
- Further develop the content of *foreldrehverdag.no* to strengthen parents' skills in caring for children in a digital society, including safeguarding children's right to privacy

- Develop and publicise national professional advice on screen use for different age groups
- Facilitate increased international cooperation and knowledge development in order to prepare evidence-based advice and recommendations on children's digital upbringing
- Provide foster parents with access to digital services on behalf of the children in their care

6.1 Children's everyday digital lives present challenges for parents

Parents face various digital challenges in everyday family life, depending on the child's age and the parents' digital competence. Some parents struggle to find a good balance between screen use and other activities while trying to protect their children from harmful content, online bullying, and social pressure on digital platforms.

6.1.1 Parental responsibility

The responsibility and duty of parents to care for their children are established in the Children Act. Those who have parental responsibility shall show care and consideration for the child and exercise parental responsibility based on the child's interests and needs. They shall bring up and maintain the child properly, contribute to the child's education, and protect the child from physical and psy-

chological violence. Parents make decisions on behalf of their children in personal matters. They shall gradually expand the child's right to make his or her own decisions according to the child's age, up until the child reaches the age of 18. In addition, they shall allow the child to participate in decisions that concern them by informing and listening to the child's opinions.

In the bill on a new Children Act, cf. Prop. 117 L (2024–2025), the Government mainly proposes a continuation of the duty of care. The Government also proposes to specify that when assessing what is in the best interests of the child, parents must recognise that this may change during the child's upbringing. Furthermore, it is proposed to add a cooperation provision clarifying that parents shall, as far as possible, cooperate to safeguard the child's health, quality of life, and development. The rules on decisions falling under parental responsibility are proposed to be continued.

6.1.2 Parents' knowledge of children's everyday digital lives

Research based on data from *EU Kids Online* shows that many parents want to know how they can best help and support their children online and ensure their safety. Parents may feel that they lack information and guidance on how to do this. Most would like to receive information and advice

Box 6.1 Comments from young people: Parents should get involved in young people's everyday digital lives

Young people from the youth councils and the Youth Network want parents and adults to try to understand what it is like to grow up in a digital world and how digital technology is an integral part of their lives. The youth councils are concerned that parents must strike a balance between keeping track of what their children are doing online to protect them from various risks and showing trust in young people rather than monitoring them.

Young people also believe that parents must recognise that phones and computers are not just a pastime but also an important way to socialise with friends and learn new things. Parents must also recognise that they themselves are users of digital tools. Young people have the following recommendations for parents:

- Show interest in what young people do online and keep an open mind.
- Learn about the apps your children use by trying them out yourself.
- Talk to your children about what they do online and trust that young people know their digital everyday life best. Good communication and trust are important.
- Digital competence is important in order to be able to advise and help young people when they encounter challenges online. This makes it easier to get involved.
- Create a parent account for the apps that younger children use to keep track of their activity.

from schools or from national or local authorities. Few parents say they receive information from the authorities. At the same time, few children say their parents have talked to them about what they do online.¹ Parents also say that different life situations and hectic everyday lives make it difficult to keep up with their children's digital lives.²

Providing parents with up-to-date knowledge on how they can best support their children and help equip them for the digital world can help mitigate concerns and address dilemmas. Knowledge enables parents to better balance protection and control in a way that safeguards children's autonomy, right to co-determination, play and leisure, privacy, and protection from harmful content.

Parental controls are tools that help parents manage and restrict the use of digital devices and content. Such solutions allow parents to set limits on time spent, purchases, apps, communication, and website visits on their child's mobile phone and tablet. However, only 38 per cent of fathers and 32 per cent of mothers use parental controls to manage their children's online activities,³ which suggests that it may be difficult for parents to familiarise themselves with the possibilities offered by parental controls.

A lot of work is being done by the authorities to give parents the knowledge they need to manage their children's everyday digital lives. *Foreldrehverdag.no* is an online resource developed by the Norwegian Directorate for Children, Youth and Family Affairs for parents with children aged 0–18. *Foreldrehverdag.no* provides quality-assured information, guidance, and answers to questions about, among other things, children's everyday digital lives. *Foreldrehverdag.no* contributes to greater awareness and confidence when dealing with children's everyday digital lives. In order to strengthen parents' skills in caring for children in a digital society, the Government will further develop the content on *foreldrehverdag.no*.

The Norwegian Media Authority develops guidance materials and campaigns aimed at parents, such as guidance for parents on exposure to harmful content. The material is available on the Norwegian Media Authority's website. The service ranges from parental guides on young children and screen use, which are distributed at health centres, to evidence-based advice for parents on video games and children's use of social media. In the surveys on

children and media, the agency maps children's media use and parents' knowledge and attitudes towards it every other year. The surveys are used, among other things, as a basis for developing advice and guidance for parents.

Different prerequisites for acquiring skills

Parents have different prerequisites for keeping up with their children's everyday digital lives, setting boundaries, and following rules and recommendations. The rapid development of technology also makes it challenging for parents to keep up with and stay up to date at all times. A report on digital parenting in Norway indicates that there may be socio-economic disparities in terms of concerns about children's screen use.⁴ For example, parents with lower levels of education and income are more concerned about the risks children may be exposed to online. The report also points out that parents with higher education are better equipped to monitor their children digitally than parents with lower education and less experience with digital media.

The Social Media Harms Committee further notes in its report that parents' concerns are not necessarily the same as those of children and young people. It can be difficult to identify risks and set boundaries when you do not have insight into your children's everyday digital lives, and parents may be unsure about which rules and recommendations apply and how they should monitor their children. Parents' digital competence affects their ability to assist their children, and thus also how children handle their encounters with various digital arenas.

6.2 Advice on time spent online and screen use

Most parents are concerned about their children's time spent on video games, mobile phones, or the internet. They are also concerned about the content their children have access to and the risks they encounter. At the same time, parents recognise that mobile phone use has positive aspects, such as maintaining relationships with friends and family and finding inspiration, and ideas for various activities and learning.⁵

¹ Elvestad et al., 2021.

² Norwegian Media Authority, 2023c

³ Elvestad et al., 2021.

⁴ Elvestad et al., 2021.

⁵ Elvestad et al., 2021.

6.2.1 Parents' attitudes towards children's screen use

Parents may be concerned that children who spend a lot of time on screens are missing out on other important aspects of life. Children may feel that their parents believe digital activities are less valuable than other activities. Children who find great joy in digital activities may find this frustrating.

It can be difficult for parents to gain insight into their children's online activities, which can lead to concerns and conflicts. Conversations between children and adults about screen use and gaming often revolve around setting rules for when and how long children can game or spend time on social media.⁶ Rules regarding screen use can create conflicts between parents and children, rather than leading to dialogue about what children actually do online or how they can balance screen use with other activities. The Screen Use Committee also points out that parents may feel guilty because they are unable to engage and have positive experiences with their children on screen. Many parents also say they spend too much time online, and many express that scrolling and screen use affect their time together and their relationships with their children.⁷

In its report, the Social Media Harms Committee points out that parents must acknowledge and respect children's media experiences in order for children to develop skills and knowledge. How children and parents talk about internet use, and how parents relate to their children's everyday digital lives, affects how children experience their upbringing. Parents who guide and help their children navigate the internet safely can build trust. By engaging with the various aspects of their children's everyday digital lives, parents can gain better understanding and knowledge and thus offer genuine support for their children in the reality in which they are growing up. Through conversations between parents and children about the positive and negative aspects of using social media and games, both parents and children can be equipped for healthier use.⁸

When children should be given access to a smartphone is also an important question for many parents. Children and young people often feel that it is important to have equal rules and opportunities when it comes to technology and mobile phones. Children may feel excluded when

friends their age get smartphones before they do. The phone can become an important part of everyday life and consume a lot of time. Children use smartphones to communicate and play games with friends, among other things. For children without a phone, this can create a sense of exclusion. As discussed in section 6.3, the question of when children should be given access to mobile phones is debated among parents, in parents' working committees, and in various parent initiatives. The Government wants to assist parents in determining when children should have access to smartphones by providing common advice on time management and screen use (see section 6.2.2), strengthening dialogue with parents' working committees (see section 6.3), and further developing the guidance for parents at *foreldrehverdag.no* (see section 6.1.2).

6.2.2 Professional advice on screen use

Many children and young people report wanting to reduce screen use but find it difficult to do so, especially in the evening. Screen use may come at the expense of sleep, schoolwork, physical activity, play, and socialising with family and friends. The Government regards this as a cause for concern. To support parents in managing their children's screen use and finding a healthy balance, the Government has tasked the sectoral authorities with developing and publicising national professional advice on screen use for different age groups. The Norwegian Directorate of Health is leading the work, with the participation of the Norwegian Media Authority, among others. The guidelines will cover recommended time for sleep, screen use (including addictive algorithm-driven apps), physical activity, social activities, and other daily activities, adapted to different age groups. This is an update of the existing national public health recommendations on screen use from 2019.⁹ Children, young people, parents and guardians are the main target group, but the advice will be communicated and developed as a basis for practical tools for public services, such as the health service. The advice should be considered in conjunction with the work being done in the education sector aimed at kindergartens and schools.

Sweden has revised its recommendations¹⁰ and now encourages children and young people up to the age of 18 to limit their screen use. The

⁶ Nøra et al., 2022.

⁷ Elvestad et al., 2021.

⁸ Nøra et al., 2022.

⁹ Norwegian Directorate of Health, 2019.

¹⁰ Public Health Agency of Sweden, 2024b.

Box 6.2 National professional advice on screen use among children, young people and guardians

The Norwegian Directorate of Health has published health advice on balanced screen use for the general public: Children under 2 years of age should avoid screens

- Children aged 2–5 should limit screen use to 0.5–1 hour per day during leisure time – less is better
- Children aged 6–12 should limit screen use to 1–1.5 hours per day during leisure time
- Young people aged 13–18 should limit screen use to 1.5–3 hours per day during leisure time
- Guardians and parents should limit their own screen use when they are with children and young people

The aim of this advice is to highlight the link between screen use and health outcomes, and to promote appropriate and balanced use of digital media during leisure time. The advice concerns screen use during leisure time, i.e. time outside of kindergarten, school, work or schoolwork.

Government will facilitate increased international cooperation and knowledge development in order to prepare evidence-based advice and recommendations on children’s digital upbringing. In addition to recommendations for parents, the Government will focus on internet service and content providers, which play an important role in setting the parameters for children’s screen use (see Chapter 9).

6.3 Parental cooperation with kindergarten and school

The kindergarten should facilitate parental cooperation and good dialogue with parents. In many kindergartens, this cooperation takes place through digital tools. Kindergartens must balance parents’ desire for information about what happens during the kindergarten day with children’s need for staff to be present for them during the kindergarten day. Kindergartens must have a well-considered approach to what and how much

they document. Kindergarten staff must have sufficient knowledge to ensure data protection for children. The strategy for digital competence and infrastructure in kindergartens and schools states that the Norwegian Directorate for Education and Training will engage in dialogue with the Parents’ Committee for Kindergartens (FUB) and other stakeholders on the use of digital media in kindergartens and in kindergartens-home cooperation.

When it comes to schools, the vast majority of pupils in grades 1–4 are assigned a digital device by the school.¹¹ Parents make different assessments about when to give digital devices to their children and how access to digital devices should be managed. When the school device is taken home, parents may feel that they lose the ability to regulate their children’s screen use. For some, this may contribute to increased conflict at home.¹²

The national curriculum stipulates that schools must ensure that parents and guardians receive the necessary information so that they have the opportunity to influence their children’s everyday school life.¹³ The principle of free education shall also apply when schools choose to use digital solutions in their cooperation with parents. If parents do not have access to digital devices or the internet, or have low digital competence, this can be an obstacle to good cooperation between kindergartens, schools and homes. In such cases, kindergartens, schools and their owners must facilitate good follow-up in other ways.

Many parents want to know what pupils are doing digitally at school and have access to their digital teaching aids. Parents have different experiences and attitudes towards technology in schools. According to the Screen Use Committee, those who believe that there are too many digital solutions in schools are less likely to feel that pupils experience accomplishment and are motivated by digital technology in schools. The Parents’ Committee for Primary and Secondary Education (FUG) survey of parents on digitalisation in schools also highlights challenges in working with parents when it comes to digital learning. Among parents with poor digital skills, as many as 72 per cent say that they are unable to follow and support their child when teaching and schoolwork take place on a digital device.¹⁴ According to the Screen Use Committee, a lack of digital skills can

¹¹ Norwegian Directorate for Education and Training, 2022.

¹² Norwegian Media Authority, 2023c.

¹³ Ministry of Education and Research, 2017a.

¹⁴ Opinion, 2022.

be an additional barrier for some families when it comes to following and supporting their children when they are working on the school's digital devices. Parents' digital competence is often linked to their level of education.¹⁵ Schools must maintain good dialogue with parents about the school's goals and framework for the use of digital technology, and parents must be given appropriate insight into their children's development and learning.

Many parents are concerned that pupils may be exposed to harmful content through the school's digital devices. Parents can obtain information about how the school protects pupils from harmful content through parent-teacher meetings, the school's parent-teacher association or other collaborative forums. The same applies to how the school works to develop pupils' digital judgement. The school should also inform parents about where they can find more detailed information about digital judgement and safe internet use. The Norwegian Directorate for Education and Training has developed relevant resources and films about cooperation between home and school that schools can use in this work. Many parents also use the FAU or parent meetings at school as a forum for discussing pupils' use of the internet, mobile phones or social media in their leisure time, and agree, for example, on common limits for when pupils should be allowed to have a mobile phone. The Government will strengthen the dialogue with parent committees on the use of digital technology in kindergartens and schools and in cooperation with parents, including considering measures to support schools and FAUs in their work to create a safe digital everyday life.

6.4 Consequences of parents' screen use

Digital tools are not only an integral part of children's everyday lives, they are also an integral part of family life. In the *EU Kids Online* survey, over 90 per cent of parents state that they use the internet several times a day and that they use several different digital tools such as mobile phones or tablets.¹⁶ Some of the screen use is related to children, for example when parents need to retrieve and provide information about their children's leisure activities such as training times or voluntary work, to obtain information about

everyday life at kindergarten, or to keep track of school activities such as homework and trips.

6.4.1 Children can be influenced by their parents' screen use

In children's first years of life, their parents' digital everyday life is also their digital everyday life. There is a great deal of uncertainty about how children are affected by their parents' screen use. There are some indications that screen use may affect the interaction between parents and children. See also section 4.2. The Screen Use Committee points out that the brain is highly receptive to influence during the first five years of life, and a lack of stimulation can have a negative impact on development. Children learn from adult behaviour, and studies show that parents play a crucial role in the digital behaviour of children and young people.¹⁷ The committee finds that children learn best through interaction with trusted adults and that screen use has no positive effects on the youngest children. They refer to a knowledge review by the Norwegian Institute of Public Health in 2022, which found that children show signs of stress when parents use mobile screens in play and interaction situations. In its 2024 knowledge review, the Public Health Agency of Sweden refers to a study from the United States showing that parents' use of mobile devices can have a negative impact on children's mental health.¹⁸ Furthermore, the Screen Use Committee points out that mobile phone use can lead parents to become less attentive to their children's needs. The Screen Use Committee notes that frequent mobile phone use, especially when it leads to reduced attention and interaction with children, may negatively affect children's well-being and sense of belonging. Therefore, the Screen Use Committee believes that screen use should be very limited for children aged zero to two, and that adults should also reduce their screen use when they are together with young children. For all children, it is important to balance screen use with activities that promote normal development, such as sleep, physical activity, play, and social interaction. Therefore, it is important that adults are aware that they are role models, including when using digital tools, and that they are conscious of when and how they use screens when they are together with their children.

¹⁵ Proba samfunnsanalyse, 2023.

¹⁶ Elvestad et al., 2021.

¹⁷ Gudmundsdottir et al., 2024.

¹⁸ Public Health Agency of Sweden, 2024a.

6.4.2 Parents' responsibility for children's privacy

Advances in artificial intelligence and algorithms lead to more data being collected about children. Some children are assigned digital profiles before and immediately after birth, linked to their parents' use of digital services. This happens, for example, through data collection from pregnancy apps and digital products that monitor infants' sleep and health. Such profiles can follow children throughout their upbringing and may also have significance later in life.

Research on *sharenting* – the practice of parents and guardians sharing content about their children on social media – indicates that most share images of their children.¹⁹ Parents' motivation for sharing images may be to keep in touch with family and friends. Most people who share, whether they are parents, grandparents, or other adults, are not always aware that sharing information about children, including images, can be problematic from both a privacy and an ethical perspective. In some cases, sharing information violates children's right to privacy and the rules governing children's participation and self-determination. This may relate to images that parents perceive as innocent but that children do not want to be shared. This may also include information about children who are in vulnerable situations, such as in hospital, or who are involved in family conflicts, parental disputes, or child welfare cases. This research also shows that children want to have a say in what their parents or guardians share about them from an early age in order to gain control over their digital identities. As mentioned above, for some children, sharing may begin before they are born or are able to consent to the sharing of their personal data on the internet. Publishing images and other personal data about children without their consent may violate their rights.

It can be challenging for parents to find the right balance between protection and children's right to privacy. Violations of children's privacy may involve monitoring their online activities and tracking them through location services and similar methods. Parents have the ability to check their children's search history, review the content on their mobile phones, and track their movements through mobile phones and smartwatches that use GPS technology and location services. When parents secretly monitor their children, it

undermines children's right to privacy and the trust between them and their parents. It may also violate children's privacy. The UN Committee on the Rights of the Child warns against routine surveillance of children and young people in General comment No. 25.

In its report, the Privacy Commission notes that current privacy legislation does not directly regulate parents' rights to publish personal data about their own children, nor does it address whether the Norwegian Data Protection Authority can order the erasure of personal data that parents have posted about their children. In April 2025, the Government presented a bill on a new Children Act (Prop. 117 L (2024–2025)). The bill stipulates that children have a right to privacy and that parents have an important responsibility to safeguard it. The provision is general in nature and serves an educational and awareness-raising purpose. The provision does not provide any other rules on when children have the competence to consent to the sharing and processing of personal data, other than what already follows from the Guardianship Act, the Personal Data Act, and various special legislation. However, it stipulates that parents shall give children an increasing degree of participation and self-determination in privacy-related matters, in accordance with their age and maturity, their capacity to understand what the decision is about, the nature of the personal data, the nature of the use of the data, the purpose of the use, and the consequences the use may have for the child's privacy. The provision clarifies children's right to refuse permission for their parents to publish images, films, and audio recordings of them.

6.4.3 Filming, sharing, and streaming leisure activities

It has become common to stream and film leisure activities, such as concerts, performances, or sporting events. One challenge in such situations is whether children and young people have given their consent to be filmed and to have their images shared, and whether they have a real opportunity to refuse in situations where parents, friends, and teammates want to share. This will be particularly challenging for children with a confidential address. There seems to be some awareness of the requirement to obtain consent when publishing images and films, as several umbrella organisations for leisure activities have both information and templates for obtaining consent. Nevertheless, it is uncertain how this is practised and

¹⁹ Reich et al., 2023.

how many images of children are available on the internet without their knowledge or that of their parents or guardians.

In 2023, the Norwegian Data Protection Authority updated a guide on streaming sporting events for children, stating that streaming sports in which several children or young people are filmed at the same time is often not legal under privacy legislation. If private individuals, such as family or friends, share or stream to a larger or undefined audience online, the same rules apply. However, parents filming leisure activities for personal use only is not usually covered by privacy legislation.²⁰ In 2023, the Board of the Norwegian Olympic and Paralympic Committee and Confederation of Sports decided, as a general rule, not to allow the streaming of grassroots events. During its deliberations, the Board emphasised privacy legislation, assessments of the best interests of the child, and the importance of complying with the Norwegian Data Protection Authority's rules.

6.5 Foster parents' digital challenges

Currently, foster parents lack the authority to digitally represent their foster children, which dimin-

ishes their capacity to provide adequate and safe care that aligns with the best interests of the child. In addition, a lot of time is spent documenting the relationship between the child and the foster parents. According to the Norwegian Foster Home Association, some foster parents find this to be a significant burden. In addition to child welfare services spending resources on sending manual attestations to relevant agencies, the lack of information about who is authorised to represent a child living in a foster home can be an obstacle to efficient and secure administration by public actors.

In order to promote stability and predictability, the Government believes that foster parents should have access to digital services for the children in their care, similar to what parents have for their own children. The Government is investigating a solution to give foster parents digital access to services on behalf of the foster child, such as *Helsenorge* and other digital platforms. The solution being investigated involves allowing relevant users of the National Population Register to retrieve information about who represents the child, so that public authorities, among others, can grant foster parents access to digital services on the child's behalf. The financial and administrative consequences of a specific proposal must be investigated.

²⁰ Norwegian Data Protection Authority, 2023.

7 Children and young people shall be aware of their rights and how to stay safe online



Figure 7.1

Whereas parents used to be the safe intermediary between the outside world and the child, digital developments now mean that a whole world can contact children directly when they are present on digital platforms from an early age. Adults cannot be present at all times in children's everyday digital lives. Therefore, it is necessary to equip children to handle the challenges they encounter online and to know where to ask for help when they need it.

The Government aims for children and young people to develop strong digital competence and judgement so they can participate, make informed decisions, and stay safe in today's and future digital society. Children and young people need skills that enable them to both take advantage of the opportunities offered by digital tools and manage the risks they encounter when using them. Digital competence is a prerequisite for fulfilling children's rights to information and participation in society, as well as to protection. Schools play a key role in helping all children and young people develop such skills and in reducing digital divides in the population.

The Government will:

- Present a strategy to strengthen the population's resilience to disinformation
- Develop a national strategy for open and enlightened public discourse that addresses how the Government facilitates a well-functioning space for expression, a good culture of expression, and expression preparedness
- Develop support resources, guidance, and advice for the use of AI in schools
- Gather experience with the use of AI in schools nationally and internationally, and apply a precautionary principle, especially with regard to the youngest pupils
- Investigate how schools should meet the need for digital skills in light of technological developments, future needs, and knowledge about children's everyday digital lives
- Strengthen the professional digital competence of teachers in kindergartens and schools
- In collaboration with KS, implement measures to support municipalities and county authorities in their efforts to ensure that all school

employees who have access to personal data have the necessary knowledge about data protection and information security

- Follow up on regulatory compliance related to universal design of digital teaching aids, including through standardisation efforts under the auspices of Standards Norway
- Follow up on the report on how best to establish one or more common support services for privacy, information security, and universal design in digital teaching aids and learning resources
- Follow up on national recommendations for mobile phone use in schools and propose stricter regulations, if needed
- Monitor the use of the Norwegian Directorate for Education and Training's recommendations on how schools can protect pupils from harmful content online
- Develop support materials for good digital practices and pupils' digital competence, in collaboration with the municipal sector and relevant actors
- Continue the collaboration with *Tenk!* and *Faktisk.no*
- Follow up on the results of the International Computer and Information Literacy Study (ICILS) 2023

7.1 Knowledge, skills and judgement

Children and young people must be able to use technology in an appropriate and responsible manner, in accordance with their age and maturity. They must be able to critically assess the information they access when using digital tools and be able to reflect on their own and others' digital practices. They must also be aware of the limits of their own and others' rights in the digital world and be able to seek information to form their own opinions and participate democratically.

Digital competence

Digital competence involves mastering digital life and maintaining a critical, independent attitude when engaging with media.¹ Most children and young people know how to use a mobile phone or computer, or install an app on their mobile phone.² However, such technical skills are only part of the digital competence that children and

young people need, and are not sufficient to enable them to cope with all aspects of everyday digital life. The international ICILS survey (see section 2.2.4) shows that Norwegian Year-9 pupils are significantly above the international average in terms of digital competence. Pupils from homes with high socio-economic status have higher digital competence than those from homes with low socio-economic status. Immigration background, the language spoken at home, and pupils' access to digital tools at home are all linked to their digital competence results.³

Digital judgement

Digital judgement includes learning, identifying, and managing risks online. Although adults and authorities have an important responsibility to safeguard the digital environment in which children grow up, it is neither possible nor desirable to remove everything that is challenging online or to monitor everything children do there. Digital competence and judgement help children identify harmful content or behaviour on the internet and make it easier for them to act appropriately when encountering such content. In order to protect themselves and others, children and young people must also know their rights and understand what is illegal or unacceptable online. This is important to prevent unwanted incidents and can help children and young people become more competent at dealing with harmful or illegal content.

Children must have good digital judgement to protect their own privacy, for example, by changing settings for the processing of personal data on social media and being careful not to disclose personal or sensitive information in groups with unknown users. Sensitive information can include details about where you live, which school you attend, your family, relationships, and interests – but especially information about vulnerabilities, challenges, diagnoses, or sexuality. Such information can be exploited to identify potential targets for grooming, abuse, fraud, or similar offences. A conscious, critical attitude towards digital tools and social media is important for children and young people to assess and understand information and interactions online.

Critical media literacy

The volume of information and the sources of information make it difficult to distinguish what is

¹ Staksrud, 2021.

² Smahel et al., 2020.

³ Rohatgi et al., 2024.

reliable from what is not. For example, videos on the internet or in blogs can be useful and reliable sources of knowledge, but they can also contain various forms of unreliable information. Critical media literacy and the ability to distinguish between true and false information can help children make good use of information on the internet. The Government will launch a strategy to strengthen resilience to disinformation in 2025. Among other things, the strategy will examine how authorities can help strengthen critical media literacy among the population, including children and young people, so that people can assess for themselves whether information, images and videos are credible.

Much of our digital everyday life takes place on commercial platforms where the sale of advertising space is part of their business model. It is a challenge that the content is sometimes difficult to distinguish from advertising. The authorities are responsible for protecting children from harmful and illegal advertising, and hidden advertising is prohibited. At the same time, children and young people need to be aware of online marketing and be able to identify which content is advertising. They must also know which types of advertising are illegal and which are illegal to target children, so they can report it if they are exposed to such advertising. The Government will develop and update guidelines and legislation on advertising, and commercial and harmful con-

tent in schools in response to the challenges posed by technological developments.

The culture of expression online affects whether children and young people can express themselves and participate in public discourse (see section 2.3.2). The Government will present a national strategy for open and informed public discourse in autumn 2025. The strategy will outline the Government's efforts to ensure freedom of expression in practice, including how to facilitate a well-functioning space for expression, a good culture of expression, and expression preparedness. This work follows up on the Freedom of Expression Commission's report.

7.2 Digital competence in kindergartens and schools

The Government wants children throughout Norway to have access to equal, high-quality kindergarten services. Digital practices in kindergartens shall contribute to children's play, creativity, and learning in accordance with the Framework Plan for Kindergartens, and ensure that all children enjoy inclusive, safe, and good environments in kindergartens. Furthermore, the Government wants a comprehensive school where all pupils learn, experience accomplishment, and thrive. Pupils shall develop digital competence in line with the national curriculum and have inclusive, safe and good digital environments at school. Schools shall combat digital exclusion by ensuring that all pupils develop sufficient digital competence to function in society and working life.⁴

7.2.1 Digital practices in kindergartens

Most kindergarten-age children are in contact with digital devices and media outside the kindergarten. Some have digital experience and references before they start kindergarten. Kindergarten staff must relate to this in the same way as they do to all other experiences that form part of the child's upbringing and formation. The kindergarten shall exercise digital judgement and help children develop a nascent ethical understanding of digital media.⁵

It is mainly the oldest children in kindergarten who use digital solutions in educational settings.⁶ The use of digital tools in educational work in kin-

Box 7.1 Dubestemmer.no

Dubestemmer.no is an educational programme focused on privacy, digital judgement, and online safety, developed through collaboration between the Norwegian Data Protection Authority and the Norwegian Directorate for Education and Training. The site is aimed specifically at pupils and teachers, but parents and other adults who work with children and young people can also find useful information there. *Dubestemmer.no* provides a good starting point for teaching a range of topics, including privacy, AI, online bullying, source criticism, social media, and the safe use of games and apps. The aim of the programme is to increase awareness, reflection and knowledge about data protection and the choices that children and young people aged 9 to 18 make when using digital media.

⁴ Ministry of Education and Research, 2023.

⁵ Norwegian Directorate for Education and Training, 2023a.

⁶ Sintef, 2019.

Box 7.2 Strategy for digital competence and infrastructure in kindergartens and schools

In spring 2023, the Government and KS presented a Strategy for digital competence and infrastructure in kindergartens and schools (2023–2030). The strategy outlines the path towards 2030 for how the central government and municipalities can address the challenges of digitalisation in kindergartens and schools. The strategy shifts the focus from quantity to quality, with a balanced use of technology and a focus on what is best for pupils' learning. Digitalisation in the sector must be responsible, based on a sound evidence base, and implemented in a planned manner. The strategy highlights privacy, information security, and universal design as particular priorities and includes measures to strengthen the evidence base, the ecosystem around digital learning resources and shared solutions, and guidance and support for the sector.

kindergartens shall support children's learning processes and contribute to fulfilling the framework plan's guidelines for a rich and versatile learning environment for all children. At the same time, digital tools shall be used with care and should not become the dominant working method. The Government and KS want to ensure that everyone who works in kindergartens has the opportunity to make good choices in the use of technology and media in their educational and administrative work.

7.2.2 Pupils' digital competence

Digital competence is both subject-specific competence and cross-curricular skills that pupils need to learn and live in a digital society. Digital competence is essential for developing pupils' identity and social relationships, and for enabling their participation in further education, employment, and society. Digital skills are one of five basic skills in the curriculum, and consist of obtaining and processing information, being creative and innovative with digital resources, and communicating and interacting with others in digital environments. This entails being able to use digital resources appropriately and responsi-

bly to solve practical tasks. Digital skills also involve developing digital judgement by acquiring knowledge, strategies for good internet use, and the ability to reflect and engage in critical thinking.⁷

In the white paper on a more practical school – better learning, motivation, and well-being in years 5–10 (Meld. St. 34 (2023–2024)), the Government notes that advancements in technologies that use artificial intelligence require consideration on what skills the pupils will need in the future and how these should be developed. Having a critical attitude and the ability to understand how technology works is becoming increasingly important. The ability to think critically and exercise good judgement is also essential for actively engaging with what is happening in life and society, and such skills are developed gradually over time.

The digital skills described in The national curriculum must meet the needs of the future, both in light of ongoing social and technological developments and of what is now known about the harmful effects of uncritical use. The Government is therefore proposing measures to achieve a more balanced use of digital technology at the lowest year groups, in line with the precautionary principle. The measures will involve some changes to the curriculum, which will be circulated for consultation in 2025. At the same time, the Government has asked the Norwegian Directorate for Education and Training to consider whether digital skills should continue to be defined as a basic skill in the curricula, and to investigate the introduction of technology subjects in schools so that schools can meet the needs for digital skills in light of technological developments, future needs, and knowledge about children's everyday digital lives.

The scope and structure of digital work in schools shall be adapted to the curriculum and the age, maturity, and needs of the pupils. Most pupils are doing well in Norwegian schools, but there are some worrying trends. There are some negative learning outcomes, including declines in reading proficiency, increased challenges in the school environment, increased school absenteeism, and increased experience of school-related stress and pressure. Reading longer texts is important for developing good reading proficiency, but screens are particularly unsuitable for reading longer, coherent informational texts. The Screen Use Committee points out that the decline in reading skills, as well as the increase in the

⁷ Norwegian Directorate for Education and Training, 2023c.

number of pupils at the lowest reading proficiency level, suggests that pupils should read more on paper and read longer, more coherent texts to a greater extent than is currently the case. Many pupils are also distracted by their own and others' use of digital resources.⁸ Therefore, it is necessary to focus on learning, reading, and concentration, and to raise awareness of when the use of digital tools supports learning.

The Government is concerned that extensive screen-based reading has contributed to a decline in reading proficiency. Several measures to improve pupils' reading and writing proficiencies are discussed in the white paper Meld. St. 34 (2023–2024).

Artificial intelligence in schools

Artificial intelligence (AI) will play a significant role in pupils' future. Schools must prepare them for this. Pupils, especially those of lower secondary school age and above, already encounter AI on the internet and social media, through AI-generated content and as a work tool. Schools must equip pupils for a future involving AI, enabling them to act with ethical awareness and critically reflect on the consequences of technology for individuals and society.

The breakthrough of generative AI can provide great opportunities for adaptation and support for both teachers and pupils. At the same time, AI also challenges some of today's practices in schools. In its advice on AI in schools, the Norwegian Directorate for Education and Training emphasises the importance of working on digital judgement, source criticism, ethics, privacy, and democracy in education. Local school authorities, school administrations, and teachers must take into account the age and maturity of pupils when using generative AI, and exercise particular caution with younger children. The Government will develop support resources, guidance and advice for the use of AI in schools. The Government will also gather experiences with the use of AI in schools nationally and internationally, and apply a precautionary principle, especially with regard to the youngest pupils.

7.2.3 Digital competence for kindergarten and school staff

Kindergarten and school teachers are responsible for educational and academic work and need to

update their competences regularly. The Government will also provide other professional groups in kindergartens and schools with good opportunities for competence development. Strengthening the competences of teachers and other staff is important for the quality of kindergartens and schools, and for ensuring that all children and pupils receive an education that promotes development, learning, accomplishment, and well-being.

The competences of kindergarten staff are very important for fulfilling the obligations in the framework plan to ensure the correct, responsible, and appropriate use of digital technology. It is the kindergarten owners who are responsible for ensuring the necessary and relevant competence in their kindergartens to meet the requirements of the Kindergarten Act and the Framework Plan. The Government has good schemes for continuing education and training that support kindergarten owners in their responsibilities.

Employees in kindergartens, schools and plan for out-of-school hours care (SFOs) are important figures in the everyday lives of children and young people, both through play, learning and care, and as safe adults in the event of negative experiences online. Good relationships between children, young people and staff are central to learning, development, and well-being. Teachers are the most important factor in children's and young people's learning, but other employees, such as assistants, skilled workers, counsellors, and student support worker, are also important sources of support and role models. They can contribute to good conversations about both positive and negative experiences online. However, research suggests that children and young people find teachers less relevant to talk to about negative experiences online.

For pupils to acquire the digital competence they need, schools must have teachers with strong professional digital competence.⁹ Among other things, teachers should be able to develop pupils' desire to learn, learning strategies, and skills for learning in digital environments, assess when the use of digital resources is appropriate, and understand how digital developments affect the content of the subjects. Professional digital competence involves insight into current legislation and ethical issues, and the ability to create a safe, beneficial learning environment for everyone.

New technology presents new opportunities and challenges for teachers' working methods

⁸ OECD, 2023; Rohatgi et al., 2024.

⁹ Kelentrić et al., 2024.

and for the development of pupils' digital judgement, subject knowledge, and basic skills. In order for teachers in primary and lower secondary schools to be able to use digital technology in an educational and responsible manner, they need regular updates to their professional digital competence. It is the responsibility of local school authorities to ensure that their employees have the correct and necessary competence to meet the requirements of the Education Act and the curriculum; however, the Government has good continuing education and training programmes in place to support this responsibility.

In 2025, the Government will spend nearly NOK 2.9 billion on skills development measures aimed at teachers and other employees in kindergartens, after-school programmes, schools, and cultural schools, among others. The Government has developed a new comprehensive system for competence and career development for employees in kindergartens and schools, which was recently presented in a strategy on this topic. The comprehensive system will be phased in during 2025 and 2026. The Government will strengthen teachers' professional digital competence in kindergartens and schools. The continuing education programmes and grant schemes for collective competence development provide good opportunities to tailor competence measures to local needs, including strengthening the professional digital competence of employees in kindergartens and schools. Additionally, several competence packages containing modules aimed at enhancing digital skills have been developed. The competence packages cover the digital learning environment, undesirable incidents, online identity, digital relationships, digital inclusion, privacy, and digital judgement.

Teacher training programmes for kindergarten and school teachers are governed by framework plans. The framework plans stipulate that all students shall have professional digital competence upon graduation as teachers. Across all national guidelines for teacher training programmes, professional digital competence is one of the topics that should be emphasised, in line with the specific nature of each programme. It is up to the institutions to interpret and incorporate these topics into their programme plans.

7.3 Safe digital teaching aids

Pupils must be safe when working with digital teaching aids at school, and their privacy and

information security must be safeguarded in an appropriate and secure manner.

Local school authorities are responsible for ensuring that pupils receive training in accordance with current legislation, including the development of digital skills. They must also prevent pupils from being exposed to harmful content and safeguard information security and pupils' privacy. Good technical solutions must be established for filtering and restricting access to harmful content on the internet on school devices. The solutions should also prevent pupils from being exposed to advertising that could lead to commercial pressure. Schools should also be aware that pupils may be exposed to hateful comments, negative influences, and misinformation and disinformation while at school.¹⁰

Furthermore, local school authorities must deal with situations where pupils report having encountered harmful content online and work with parents on pupils' everyday digital lives. In the strategy for digital competence and infrastructure, the Government has launched a number of measures to improve privacy and protect pupils from unwanted and harmful online content.¹¹

Pupils have the right to freedom of expression, which includes the freedom to seek, receive, and impart information. Restrictions on internet access must be weighed against pupils' freedom of expression.¹² Age-appropriate restrictions on internet and app access in schools can help reduce the risk of pupils being exposed to harmful content on school devices, while also harnessing the learning potential of digital tools and resources in a safe and effective manner. However, such filters have limited accuracy and can provide a false sense of security, and therefore cannot replace training in digital judgement or the role and responsibility of caregivers.

The Norwegian Directorate for Education and Training has updated its guide on how to protect pupils from harmful content online so that it can serve as a useful tool for local authorities and schools.¹³ The Directorate recommends that all local school authorities provide age-appropriate solutions that restrict access to the internet and apps in the form of filters on pupils' digital devices and on the school network. If pupils have their own digital device from the school, the Directorate recommends that the school use a filter that

¹⁰ Norwegian Directorate for Education and Training, 2024a.

¹¹ Ministry of Education and Research, 2023.

¹² UNICEF, 2025.

¹³ Norwegian Directorate for Education and Training, 2024a.

restricts pupils' online access to predetermined content. This is particularly important if pupils use the digital device on their own, either at school or at home. The Directorate also recommends that all school owners use Kripos' list of websites that are known to be used to contact children or that are created for adults for the purpose of grooming, dating, or sexual services in their filters on networks and devices. A total of 299 municipalities use this list, which represents approximately 84 per cent of all municipalities. The Government will monitor the use of the Norwegian Directorate for Education and Training's recommendations on how schools can protect pupils from harmful content online.

The municipalities and county authorities are responsible for selecting safe digital teaching aids and can determine in which situations pupils should use digital tools. At its 2024 National Assembly, the Norwegian Association of Local and Regional Authorities (KS) designated a "safe and secure society" as one of its main priorities for 2024–2027. In the SkoleSec project, organised by KS, municipalities and county authorities have joined forces to strengthen their work on privacy and information security in the digital learning environment. The goal is to enhance privacy and information security.¹⁴

The Government, in collaboration with KS, will implement measures to support municipalities and county authorities in their efforts to ensure that all school staff who have access to personal data have the necessary knowledge about privacy and information security. In order to strengthen privacy efforts, information security and universal design in schools, the Norwegian Directorate for Education and Training has investigated how best to establish one or more joint support services for privacy, information security, and universal design in digital teaching aids and learning resources. The report presents models for the organisation and content of the support services. The Government will follow up on the study.

¹⁴ KS, 2024.

7.4 Mobile-phone-free schools

The Government is committed to ensuring that pupils in Norwegian schools learn more and better, and that they have a calm environment, and can concentrate in class. It is important that schools are places of learning and community, and that they set clear standards for good digital habits for children and young people. The Government has therefore issued a clear national recommendation on mobile-phone-free schools, and almost all Norwegian primary and lower secondary schools have now introduced restrictions on mobile phone use during school hours.¹⁵ The Norwegian Directorate for Education and Training recommends strictly regulating pupils' access to and use of private mobile phones and smartwatches through school rules. The aim is to reduce disruption to teaching, promote learning, strengthen the school environment and prevent bullying and other forms of infringements.

Among other things, the Norwegian Directorate for Education and Training emphasises that private mobile phones and smartwatches at school are not part of the school's educational technology, and that the school cannot require pupils to use them in teaching and training, partly on the basis of the principle of free education. Teaching time should therefore be mobile-phone-free at all levels. For primary schools, the Directorate recommends strict regulation of mobile phone use during recess, and as a general rule, there should also be no mobile phones during recess in lower secondary schools. In view of the age and maturity of the pupils, the Directorate does not recommend mobile-phone-free recess as a general rule in upper secondary schools, but recommends mobile-phone-free teaching time here as well. The Government will follow up on the national recommendations for mobile phone use in schools and propose stricter regulations, if needed.

¹⁵ Norwegian Directorate for Education and Training, 2024d.

Box 7.3 Recommendations on the regulation of mobile phones and smartwatches in schools*Primary school (years 1–7)*

The Norwegian Directorate for Education and Training recommends strict regulation of the use of private mobile phones and smartwatches in primary schools during teaching and recess.

Pupils' maturity, soft skills and ability to self-regulate are at their lowest early in their school career. To ensure a peaceful, orderly, safe, and good school environment, there is an additional need for clear, predictable rules for smartwatch and mobile phone use in primary school.

Lower secondary school (years 8–10)

The Norwegian Directorate for Education and Training recommends strict regulation of private mobile phones and smartwatches in lower secondary schools during teaching, and that recess should generally be free of mobile phones.

Although lower secondary school pupils are older than primary school pupils, strict regulation is necessary in order to minimise disruption and strengthen the school environment.

Upper secondary school

The Norwegian Directorate for Education and Training recommends strict regulation of the use of private mobile phones and smartwatches during teaching time in upper secondary school. In the opinion of the Norwegian Directorate for Education and Training, strict intervention during breaks and recesses would not be proportionate, given the pupils' maturity and age. However, the desire to strengthen the learning and school environment may justify certain restrictions, also during recess.

Upper secondary school is a complex institution with several different educational programmes. Any regulations must take into account that pupils, according to their teachers, may need access to private mobile phones or smartwatches during lessons, and this should be taken into consideration when establishing regulations through local school rules, provided this is in line with the principle of free education.

8 Public services shall be accessible, up to date and adapted to children’s needs



Figure 8.1

Employees who work with children and young people must have strong knowledge and expertise about their everyday digital lives. Without such expertise, there is a risk that children and young people will not receive the help they need when they need it. To provide good support, guidance, and protection, those who interact with children in their daily work must understand which digital services children use, what they need, how they communicate, and the opportunities and challenges that come with growing up in a digital society. This is crucial to building trust, picking up on signals, and contributing to a safe everyday life in the digital environment.

The Government’s goal is for employees of public services who work with children, young people, and parents and guardians to have sufficient knowledge about children and young people’s use of digital tools and their rights, such as privacy and the right to protection. In this way, they can understand, follow up, and protect children and young people in their everyday lives and guide parents.

For children to tell adults about the challenges they encounter online, they must feel confident that they will be understood and taken seriously. Furthermore, services that interact with children must be adapted to children and accessible where they are. This includes employees in the police, health centres, school health services, child welfare services, and family counselling services.

The Government will:

- Review existing content on *ung.no* about internet-related abuse and assess whether new content is needed
- Strengthen assistance to children and young people who are exposed to the sharing of images and films on the internet without their consent
- Evaluate the effectiveness of the Online Police Patrols and assess how police services can be adapted to children’s everyday digital lives
- Investigate how the provision on grooming in the Penal Code can be worded to also cover digital sexual abuse of children

- Consider a possible increase in the penalty for violations of Section 311 of the Penal Code on the depiction of sexual abuse of children
- Strengthen the enforcement of the rules that protect against the sharing of naked images and offensive images without consent
- Further develop *ung.no* through the *DigiUng* collaboration
- Follow up on knowledge gathering about information and support services for children and young people under the age of 13
- Contribute to improving the quality of youth clubs by prioritising video games and encouraging the municipal sector to facilitate safe and inclusive meeting places for gaming culture
- Gather, strengthen and share knowledge and competence about video games and gaming culture, as well as the risks associated with gaming

Box 8.1 Comments from children and young people: Adults must understand the everyday digital lives of children and young people

The youth councils believe that young people feel that the adults they encounter in various public services often do not understand the everyday digital lives of children and young people. They lack knowledge about what young people do online and the problems they may face. Adults who work with children and young people need greater digital competence to help them take advantage of the opportunities available online and avoid the dangers. Young people believe that courses in digital competence should be provided for adults who work with children and young people.

8.1 Knowledge about digital upbringing in the services

Research results from *EU Kids Online* 2018 show that Norwegian children rarely turn to an adult for help with internet-related challenges, and very few talk to adults in support services or at school.¹ Researchers question why adults in general, and teachers in particular, are not perceived as relevant helpers for digital problems. It is crucial that when children do seek help, they meet adults who understand their everyday lives and the importance of digital media.

Health centres and school health services

Health centres and school health services are key services for children and young people. It is important that employees have the competence and knowledge to support digital safety in the lives of children and young people. The services offered to children and young people in the school health service should include health-promoting and preventive psychosocial work, as well as cooperation with schools on measures to promote a good psychosocial environment. A good psychosocial environment should also include a safe digital everyday life. The school health service can help to disseminate knowledge about screen use to pupils, teachers, and parents and guardians.

Children's right to privacy also applies when they contact the support services. In some cases, children and young people aged 12 to 16 have the right to withhold information from their parents. At the same time, parents have the right to consent to health care and the right to access their children's and young people's health information until they reach the age of 16. Digitalising health services for children and young people is challenging because such considerations may conflict. This also applies to digital contact with the health service or digital access to patient records. Another challenge is the support services available on social media, where commercial operators can collect highly sensitive information about children.

The Norwegian Directorate of Health has drawn up national professional guidelines on social media in health centres and school health services.² The guidelines address how health personnel should engage with social media, including information about children that health personnel may access through it. The guidelines also discuss confidentiality, data protection, reporting and notification obligations, and provide tips on using social media in the work of a public health nurse. This advice was last updated in November 2022. The advice will be updated as necessary in line with new knowledge.

¹ Staksrud, 2019.

² Norwegian Directorate of Health, 2018.

Box 8.2 Professional advice on self-harm and suicide in social media

The Regional Resource Centres on Violence, Traumatic Stress and Suicide Prevention (RVTS) have developed the website www.selvskading-some.no to provide knowledge and professional advice to adults who work with children and young people about content relating to self-harm and suicide online, and how they can talk to children and young people about these topics.

The child welfare services

There are both positive and negative aspects to the use of social media among children living in child welfare institutions. Digital communication tools make it possible to keep in touch with friends and family and expand social networks. However, there are several examples of children and young people living in institutions forming networks across child welfare institutions that contribute to negative social learning. They can use social media to encourage self-harm, the sale of sexual services, or the sale of drugs. Employees in child welfare institutions feel they have little control over what children do on social media and what they are exposed to, and have called for updated legislation to confront these challenges.³ Under the current Child Welfare Act, employees at child welfare institutions cannot monitor children's correspondence. A lack of insight into and control over the digital communication or activity of children living in institutions can mean that children and young people do not receive the care and protection to which they are entitled. Save the Children Norway has warned that children in child welfare institutions are vulnerable to sexual offences on the internet.⁴ The organisation believes there is a need to assess whether the current legislation is sufficient to meet the requirements for effective protection of children against sexual abuse. It finds that the current legislation is not adapted to the use of digital media among children and young people.

In Prop. 83 L (2024–2025), the Government proposed amendments to the Child Welfare Act. The bill contains, among other things, a proposal

to repeal the prohibition on institutions monitoring a child's correspondence. Furthermore, it is proposed to enact legislation providing that, if there is reasonable suspicion that the child is exposed to danger or harm through the use of electronic communication, the institution may access the child's communication. In addition to the requirement of reasonable suspicion that the child is exposed to danger or harm through the use of electronic means of communication, there is a requirement that access is a necessary measure to provide the child with proper care, protection, and treatment. A clear legal basis will reduce ambiguity for employees at institutions, children, and parents regarding when the institution can demand access to the child's electronic communications. A clear legal basis and legal safeguards can contribute to greater predictability and better legal protection for the child. If adopted by the Storting, the rule will put institutions in a better position to provide children with the necessary care and protection during their stay.

Knowledge about parental support

Digital competence should be an integral part of the municipalities' parental support efforts. The online resource on parental support work in the municipalities is a digital professional support tool aimed at employees and managers in municipalities who interact with parents in their services. The resource describes methods, support measures, and programmes that municipalities, various services and the voluntary sector can use to empower parents. The resource includes articles on parental guidance on children's digital upbringing and is continuously being developed with new articles and other content.

In order to enhance digital competence among professionals who work with parents and children, the online resource shall be strengthened with new articles and competence packages. This is in line with the UN Committee on the Rights of the Child's recommendation in General comment No. 25 to provide training and guidance to teachers and other adults working with children and young people on the appropriate use of digital devices.

The police

The police provide information and guidance on safe internet use on their website. All police districts have established Online Police Patrols that are visible and accessible on social media. There,

³ Minde, 2021.

⁴ Save the Children Norway, 2020.

the police share information, receive tips, answer questions, and carry out police work online. The public can follow the Online Police Patrols on social media and contact the police via those channels. For children who need to talk to the police in a safe and secure manner, Sikker Chat (Secure-Chat) is available. Sikker Chat involves the Online Police Patrols being able to send a link to Sikker Chat in order to move a conversation to a secure chat room. The Government will evaluate the impact of the Online Police Patrols and assess how police services can be adapted to children's everyday digital lives.

In addition, the police have developed teaching programmes on image sharing, such as *Delbart* (Sharable) on sharing sexualised images and *DELE=DELTA* (SHARING=PARTICIPATING) on sharing violent videos. These programmes can be used by teachers, public health nurses, social educators, and others who work with children.

The Government has allocated NOK 30 million in the 2024 National Budget to strengthen the police districts' capacity to detect, investigate, and prosecute internet-related abuse of children. A programme is also being developed to enhance competence in the justice sector in this area. The Government will also examine how the provision on grooming in the Penal Code can be worded to also cover digital sexual abuse of children, and consider a possible increase in the penalty for violations of Section 311 of the Penal Code on the depiction of sexual abuse of children.

Box 8.3 Comments from children and young people: Strengthening children's legal protection

The Youth Network points out that children and young people are vulnerable when interacting with the police and the justice system and demands that the policy for a safe digital upbringing strengthen children's legal protection. To achieve this, children and young people must know their rights and have access to good, age-appropriate information on how to notify and report when they experience something unacceptable. The Youth Network also believes that children must have the opportunity to report anonymously to platforms and to the police.

It is crucial to systematically share information among relevant services regarding the challenges caused by internet-related child abuse. A uniform and good understanding of the challenges helps to ensure that the measures taken are effective. The police prepare reports that compile intelligence, providing valuable insights.

The illegal sharing of sexualised images and films on the internet is a major burden for those who are subjected to it. The helpline *Kors på halsen* (Cross my heart), run by the Norwegian Red Cross, and the question-and-answer service at *ung.no* are examples of services aimed at children and young people that offer free advice and guidance to victims. The Government will review the existing content on *ung.no* about internet-related abuse and assess whether there is a need for new content. See also the discussion of *ung.no* in section 8.2.

Slettmeg.no provides advice on how to proceed in order to have information, images, and films removed from the internet. Telecommunications service providers also offer assistance with removal. However, this requires that the individual making the request is a customer of theirs. There is a need to improve the services offered to vulnerable individuals, especially children under the age of 14. The Government will strengthen the enforcement of rules that protect against the sharing of naked images and offensive images without consent, and strengthen assistance to children and young people who are victims of the sharing of images and videos on the internet without their consent. See also the discussion of digital services for children in section 8.2.

Facilitating digital leisure activities

Some youth clubs and libraries facilitate digital youth culture and gaming. They contribute to making digital leisure activities more accessible and social. At the same time, they often design the activities together with the young people who use them. This helps to reduce the cost of participation and allows young people to engage in digital culture together. It is important that youth workers have knowledge about children's everyday digital lives so that they can build good relationships with young people. Youth Work Norway, the national association for youth clubs and youth centres, works to promote an inclusive gaming culture in youth clubs throughout Norway, with a particular focus on girls.

The Government will facilitate more safe spaces for gaming and e-sports. In December

2023, the Government launched a strategy to create an inclusive, safe, and accessible gaming culture for 2024–2026. The strategy aims to strengthen knowledge and competence and develop a safe and inclusive infrastructure. The measures include the establishment of a national centre of expertise for gaming culture under the games division of the Norwegian Film Institute (NFI Spill), the expansion of the NFI's mandate to include gaming culture, and a strengthening of the role of the Norwegian Media Authority. The aim is to combat vilification, harassment, and abuse among players and to strengthen gaming culture through greater knowledge and improved infrastructure. The Government will gather, strengthen and share knowledge and competence about video games and gaming culture, as well as the risks associated with gaming. The Government will also contribute to improving the quality of youth clubs by prioritising video games and encouraging the municipal sector to facilitate safe and inclusive meeting places for gaming culture.

The Government's goal is for everyone to have equal opportunities to participate in cultural, sporting and outdoor activities. The action plan on equal opportunities to participate in cultural, sporting, and outdoor activities (2024–2026) discusses the need for safe environments with adult

supervision, access to open meeting places, and facilities for video games. Most children and young people engage in organised leisure activities during their upbringing, but some do not. To ensure equal opportunities for participation, the Government will contribute to improving the quality of local youth clubs, including by further developing their cultural and digital infrastructure.

The Government's efforts to strengthen the youth club sector and to include more children and young people in leisure activities are also discussed in the forthcoming report on social mobility and social equality, which will be presented to the Storting in June 2025.

8.2 Accessible public services for children

Children and young people seek information, advice, guidance, and help through digital platforms. They need accessible, adapted support resources they are familiar with and know they can turn to when they need help. Digital services are an important part of low-threshold services for children and young people.

Ung.no and DigiUng

Ung.no is the central government's most important digital channel for information, dialogue, and digital services for young people. In 2024, *Ung.no* had over 21 million visits and answered more than 100,000 questions from young people. The website gives young people the opportunity to ask questions about anything they want to know, search among around 400,000 previous answers, and read approximately 800 articles on a wide range of topics. *Ung.no* also offers over 50 chat services and a range of self-help tools that support young people in different situations and emotional challenges. The location service *Hjelp nær deg* (Help near you) provides guidance to the nearest health centre based on the young person's location.

Digital safety is a key topic on *ung.no*. Here, young people can find advice on internet use that enhances their digital competence and safety. They also receive information about freedom of expression, critical media literacy, and how to file complaints. *Ung.no* collaborates with the Norwegian Media Authority, Kripos and *slettmeg.no* on internet safety and the prevention of sexual extortion for financial gain. The website contains articles and advice on online sharing, legality, and extortion.

Box 8.4 Comments from children and young people: Inclusive digital leisure activities

The Youth Network requests that the Government facilitate accessible digital leisure activities. There are barriers to participation in digital leisure activities, just as there are in other leisure activities. These may be related to finances, gender, minority background or disability. To ensure children have the opportunity to participate, digital leisure activities must be accessible to all children and young people, regardless of background. The Youth Network emphasises that the policy for a safe digital upbringing must ensure that all children have equal access to various digital leisure activities and equipment, for example, through youth clubs and voluntary organisations. Physical meeting places provided by these organisations should also include digital leisure activities, such as video games.

Ung.no is present on five different social media channels to meet young people where they are. The aim is to provide relevant, quality-assured information and to counteract disinformation, for example. For example, a child-friendly overview of the most important complaint bodies has recently been created on *ung.no* so that young people know where to complain if they receive a decision they disagree with or experience an unpleasant situation at school, with the child welfare services, or in the health service. *Ung.no* aims to provide young people with information and guidance that expands their capacity for action and ability to make good choices. The service is developed in close dialogue with young people, including through *DigiUngdomspanelet*, a separate youth panel for *DigiUng*, as well as insights gained from the questions young people submit to the question-and-answer service. *Ung.no* is built around the needs of young people, and user participation is central to its development. The vision is that *ung.no* will make it a little easier to be young in Norway. The service will be adapted to the different needs of young people. To better reach Sámi children and young people, a Sámi information page will be established, providing an overview of relevant support services.

DigiUng is a cross-sectoral collaboration between several government agencies that aims to give young people in Norway easy access to quality-assured digital information about their rights, duties, and opportunities through guidance and services, all gathered in one place.

The Ministry of Children and Families and the Ministry of Health and Care Services are leading the development of *DigiUng* and *ung.no*, in close cooperation with the Ministry of Education and Research, the Ministry of Culture and Equality, the Ministry of Labour and Social Inclusion, the Ministry of Justice and Public Security and the Ministry of Digitalisation and Public Governance. The Norwegian Directorate for Children, Youth and Family Affairs has system ownership, administrative responsibility, and editorial responsibility for *ung.no*. The organisations in *DigiUng* contribute quality-assured content, guidance and services to young people through *ung.no*. Both *ung.no* and *DigiUng* are based on Articles 13 and 17 of the Convention on the Rights of the Child, which stipulate that children and young people have the right to information and that the central government (the state) has a responsibility to ensure this. The Government will further develop *Ung.no* through the *DigiUng* collaboration.

Information and services for children under 13

Children under the age of 13 currently lack a public online service they can turn to for assistance with challenges and questions. There are a variety of digital services available, but, with the exception of the emergency telephone service for children and young people, few specifically target younger children. At the same time, the services are finding that younger children are increasingly contacting them, even about serious issues such as violence, suicide, and mental health challenges. Special expertise is required when speaking with younger children, and information and advice must be adapted to this group. The Norwegian Directorate for Children, Youth and Family Affairs and the Norwegian Directorate of Health have conducted research to gather knowledge about children under the age of 13's experiences, needs, and wishes regarding online information and support services. The research confirmed that children have limited knowledge of existing support services, how to contact them, and what kind of help they can provide. It also revealed that children aged 9–12 have distinct preferences for support services. The current structure of the services does not meet the needs of all children. Among other factors, there are differences in how girls and boys utilise the services, and the services are not significantly differentiated by age. Furthermore, there are few reports of inquiries from children with a minority background, as well as reports of violence and abuse. Among the measures highlighted as potential short-term measures are increasing the visibility of existing services for children and young people and enhancing the user experience for children under 13 who already utilise digital support services, such as *ung.no*. It was also proposed to conduct a legal review of privacy and consent in relation to information and support services for children aged 9–12, and to investigate the establishment of flexible support services that meet children's different needs and preferences. The Government will follow up on the insight work.

Helsenorge

At *Helsenorge*, children and young people have access to quality-assured health information and a range of self-help tools. For example, there are quality-assured health tools that can motivate and contribute to self-management. The tools include online courses, apps and videos on mental health,

physical health and lifestyle habits. This is intended to enable children to make good health choices and contribute to their own health. Active participation in their own health can also help improve their quality of life. In addition, it can contribute to sustainable health and care services and reduce the burden on these services.

Many public digital solutions require login with electronic identification (eID), for example, *Helsenorge*. High-security eID is not available to all children. For children under 18 to obtain a high-security eID, parental consent is required. This is a challenge for young people who need to communicate with health personnel without informing their parents. Norsk helsenett SF is considering the possibility of allowing young people aged 13 to 16 to access digital services on *Helsenorge*.

DigiHelsestasjon

DigiHelsestasjon offers digital services for health centres and school health services, including health centres for young people. The service enables residents to communicate with health centres and school health services in a way that ensures security and privacy. Residents can view their appointments with the service, cancel them, and send messages directly to the health centre. People over the age of 16 have access to the highest level of security and can send messages about health-related issues directly to a public health nurse. The *Helsenorge* app offers functionality for young people aged 13 and over, allowing them to contact the service. By logging in with the Norwegian public-sector electronic login service MinID, young people can access appointment bookings, advice, and information.

9 Digital services, platforms and marketing must be adequately regulated and safeguard children's rights

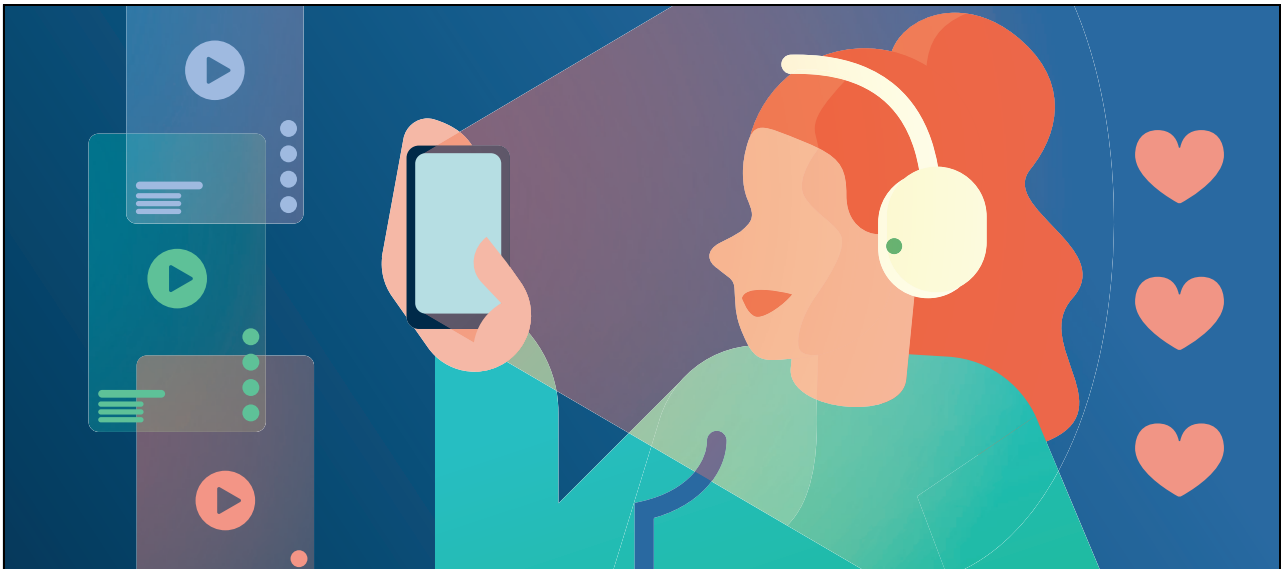


Figure 9.1

Children's privacy and consumer protection are challenged by commercial actors whose business models rely on the collection of personal data and exposure to advertisements.

The Government aims to reduce commercial pressure, harmful content and use, and protect children from sexual exploitation. Furthermore, the Government aims to ensure privacy protection for all, protect residents from digital surveillance and influence, and impose stricter requirements on private companies' information-sharing.

The Norwegian authorities shall be a driving force in ensuring that regulatory developments take children's rights into account. Digital services and platforms have considerable power over what children and young people are exposed to. Necessary regulations and effective enforcement of existing regulations are essential to protect children. Taking an active part in the EU's regulatory development will also help to protect children in the digital environment in Norway by ensuring that service providers of digital services used by children comply with applicable regulations and safeguard children's rights.

The Government will:

- Promote children's rights online through dialogue with platform companies and the technology industry
- Ensure transparency concerning algorithms on digital platforms and the monitoring of providers
- Update the concept of harmfulness in the Act relating to the protection of minors against harmful audiovisual programmes, and consider legislative amendments to protect children and young people when encountering new digital media
- Prioritise the work of incorporating the Digital Services Act (DSA) into the EEA Agreement and Norwegian law
- Work to ensure that the AI Act is implemented in Norway concurrently with the EU
- Consider various solutions for safe and secure age verification to protect children and young people on social media
- Develop and update guidelines and regulations on advertising, and commercial and harmful

content in schools in response to the challenges posed by technological developments

- Quickly implement new rules on infringement penalties for breaches of good marketing practice in relation to children
- Continue working to protect children, in particular, from marketing on social media and in games
- Provide input to international policy and regulatory developments to strengthen consumer protection for children, including in relation to manipulative and addictive design, loot boxes, and the EU’s Digital Fairness Act
- Assess the labelling requirement for retouched (altered) images in the Marketing Control Act in light of the use of AI-generated images in advertising
- Work towards a more coordinated and powerful enforcement apparatus for children’s consumer protection in digital media
- Raise the age limit in the Personal Data Act for children’s consent to the processing of personal data when using information society services from 13 to 15 years of age
- Circulate a proposal for consultation on introducing an age limit for social media
- Assess whether there is a need for stricter regulation of parents’ publication of films and images of their own children in online marketing
- Monitor developments in young people’s gambling habits and block websites that offer illegal gambling involving skins, virtual gaming currency, and similar items
- Facilitate effective enforcement of European regulations designed to protect children on the internet
- Further develop cooperation with Norwegian service providers on how they can prevent their services from being used for the criminal storage or distribution of abuse material
- Participate in European and international cooperation on internet-related abuse of children
- Develop a system for forwarding content depicting child sexual exploitation and abuse of children on the internet to the police

9.1 Providers must take greater responsibility

The Government will facilitate the effective enforcement of European regulations designed to protect children online. This will also help ensure that digital service providers take greater respon-

Box 9.1 The UN Committee on the Rights of the Child’s views on the responsibility of business

The UN Committee on the Rights of the Child’s General comment No. 25 from 2021 states that digital platforms and services must respect children’s rights, prevent abuse and remedy any violations. The authorities should ensure that this responsibility is followed up. The Committee also believes that national policies should be directed specifically at the digital environment and that States parties to the Convention on the Rights of the Child should introduce regulations, industry rules, design standards, and action plans in line with this.

The Committee believes that providers of digital services to children should offer services that are adapted to children’s age, development, and abilities. They recommend that providers engage in active dialogue with children, implement appropriate safety measures, and take children’s views into account when developing products and services. Furthermore, the Committee recommends that providers receive training on how the digital environment affects children’s rights, how they exercise their rights, and how they access and use the digital environment. Providers should also learn how to apply international human rights standards in their services and products.

sibility for protecting children’s privacy and consumer protection, and take into account their vulnerability and risk when using digital services. Some issues can be resolved through voluntary measures, while others must be resolved through regulation. In consultation meetings, actors in the technology industry have stated that they take this responsibility seriously. There are several examples of digital service providers taking responsibility for protecting children. Among other things, tools have been developed to improve children’s safety by adding parental control features to many applications and digital devices. Some digital services have also introduced settings that allow children or parents to control and manage both time and money spent. However, the extent to which these are used by children and parents varies (see section 6.1.2).

Furthermore, there are several examples of digital service providers taking responsibility for protecting children. In editorially controlled media, content marketing can make it difficult to distinguish between editorial content and advertising. A revised provision on external funding of journalism was included in the *Code of Ethics of the Norwegian Press*, effective from 1 January 2024. Among other things, it stipulates that “[e]xternal funding of journalism aimed at children must safeguard children’s special need for protection.”¹ The Expert Committee on Influencer Marketing (Fim) was established by the Norwegian Advertisers’ Association and the Norwegian Media Businesses’ Association and describes itself as a self-regulatory body for industry actors that aims to help reduce appearance and body-image pressure from influencer marketing. Fim has received public funding for its operations and has been a positive supplement to public law enforcement. The Ministry of Children and Families will assess the future role of Fim in relation to other measures to strengthen the protection of children.

However, actors in the technology industry have stated that they cannot be solely responsible for children’s safety and that they depend on cooperation with authorities, parents, and children. They are concerned that children and young people need digital competence to make good choices online.

The Government notes that commercial considerations can sometimes conflict with children’s rights. Where providers’ own measures do not provide sufficient protection for children, it is necessary for the authorities to develop regulations that safeguard children’s rights. Regulations are an important tool for providing children and young people with statutory protection. At the same time, the Government will promote children’s rights through dialogue with platform companies and the technology industry.

9.2 Promoting children’s rights in international regulations

Children and young people use digital services that expose them to content from anywhere in the world. Norway has a strong interest in regulating digital technology, and the Government wants to take the lead where appropriate in regulating technology and big technology companies. The

fact that digital technology is available across national borders raises both practical and legal issues for the enforcement of regulations. There are limited practical and legal possibilities for applying Norwegian rules to foreign services.

In the consumer protection, common European rules have been established to guarantee, among other things, a high level of consumer protection across the EU/EEA countries. This delineates the possibilities for using national legislation to ensure children’s consumer protection in digital media. The main rule is that, the country of establishment or origin has the authority to make decisions and enforce laws (jurisdiction) regarding digital services.

With regard to data protection, the General Data Protection Regulation provides that the supervisory authority in the country where the enterprise (the data controller) is established acts as the so-called *lead supervisory authority*. This has bearing on the Norwegian Data Protection Authority’s ability to ensure the protection of Norwegian citizens’ privacy in relation to foreign enterprises. Many of the large platforms and services are established in Ireland, and the Irish Data Protection Commission is responsible for enforcing the legislation. However, there is an EU cooperation body, the European Data Protection Board (EDPB), which is intended to ensure consistent and uniform application and enforcement of the rules.

Common legislation in Europe is a vital instrument for ensuring effective protection concerning services that operate across borders. The Government will work closely on sound regulatory changes to protect children and will promote Norwegian interests in relation to the EU on issues concerning the protection of children on social media. This includes age limits, age verification, protection against commercial exploitation, consumer protection, and illegal and harmful content on social media. This work must be seen in the context of ongoing regulatory processes in the EU/EEA.

9.2.1 The responsibilities of platform companies

The emergence of internet platforms, and in particular the largest global platforms, has dramatically changed how information is received online. On platform services, algorithms control what kind of information is made available to users, based on, for example, the use of personal data or user interfaces designed to keep users on the plat-

¹ Norwegian Press Complaints Commission, 2023.

form for as long as possible. Platform services thus have a significant influence over users and a major impact on public discourse. This has triggered a need for greater control, in the form of regulations, to protect users' rights and hold internet platforms accountable. The Government wants to ensure transparency regarding algorithms on digital platforms and how the supervision of providers can be carried out.

Digital Services Act

The Digital Services Act (DSA) was adopted by the EU in 2022. Under the Act, the very large online platforms and online search engines bear the most extensive obligations.

Platforms may be obliged under current consumer protection legislation to design their services to limit problems with illegal content. Such obligations are also increasingly being specified in new legislation such as the DSA and the amendment to the Audiovisual Media Services Directive (AVMSD) (see section 9.2.5).

The DSA imposes obligations on platforms to reduce the risks posed by their services and user-generated content. This will contribute to better protection of children. The Government adopted its position on the DSA in 2022 and supported a prohibition on behavioural advertising directed at children (profiling). The DSA is an internal market regulation and is EEA-relevant. The Screen Use Committee recommended the incorporation of the DSA into Norwegian law, and this recommendation received broad support in the consultation process. The Government will prioritise the work of incorporating the DSA into the EEA Agreement and implementing the regulation into Norwegian law. Such implementation requires a new act, and the aim is to submit a draft act for public consultation in 2025.

9.2.2 Protection of children

It follows from Article 28 of the DSA that online platforms accessible to persons under 18 years must ensure a high level of privacy, safety, and security for young users.

Very Large Platforms (VLOPs) and online search engines must identify and assess the risks to which children and young people using their services on the internet are exposed (Articles 34 and 35). Among other things, the services must assess:

- whether minors will easily understand how the service works (recital 81)

- whether they risk encountering content that could harm their “health, physical, mental and moral development” (“age-inappropriate content”) (recital 81),
- and how design features may cause addiction (recital 81/83).

Platforms must take measures to reduce such risks. These may include settings that help parents and caregivers monitor or restrict children's internet access, systems to verify users' ages before they access the service, and tools to help young people report abuse or seek support.

The DSA also requires social media and other internet services to have procedures in place to remove content that is illegal under national law. This procedure will make it easier to have illegal content removed. The DSA intends to make it easy for users, including children, to report and complain when they discover illegal or harmful content. Platforms should also act quickly when notified, and they are required to have procedures in place for reporting illegal content or content that violates their terms of use.

Privacy is important for all users, and platforms used by children must provide a high level of privacy protection. The DSA stipulates that terms and conditions must be written and updated in an understandable manner, and online services used by minors must make an extra effort to explain them clearly so that young users can understand what they are consenting to.

The DSA prohibits what is known as *manipulative design*, i.e., the way the internet interface is designed to persuade and trick users into doing things they may not want to do. This will also benefit children. The regulation also prohibits behavioural advertising that targets children.

The European Commission is working on guidelines for the protection of children under the DSA. The Commission has recently circulated a draft for consultation.² These guidelines will be key to ensuring the safety of children and young people in the digital environment in Norway as well. The EU has begun work on an *EU Code of Conduct for age-appropriate design*, as required by Article 45 of the DSA. These are ethical guidelines that enterprises can voluntarily adopt to safeguard children online. The guidelines will not replace the platforms' obligations under the DSA.

² European Commission, 2025.

9.2.3 Regulation of artificial intelligence

In 2024, the EU adopted a new regulation on artificial intelligence (AI), the AI Act. The main purpose of the AI Act is to ensure that artificial intelligence is developed and used in a way that is safe, ethical, and in accordance with fundamental rights and values. The regulation prohibits the sale and use of AI systems that exploit the vulnerabilities of some people in such a way that it could cause significant harm, for example, due to age or disability. Strict requirements are imposed on the development and use of high-risk AI systems, such as those used in critical infrastructure, when assessing social services. The regulation also requires labelling of content created using AI. Although it is general in nature and not specifically aimed at children, it recognises the special rights of children, both in general and in the digital ecosystem. It also addresses the vulnerabilities of children as a group. This is important for the use of high-risk AI systems and, not least, prohibited AI practices. The Government will work to ensure that the regulation is implemented in Norway concurrently with the EU.

9.2.4 Age verification

Currently, there is no reliable method for secure age verification. This makes enforcing the age limit provisions in privacy legislation, for example, more difficult. Many digital services have no verification of the user's age beyond a self-declaration. This means that users themselves declare their age without any form of verification. Therefore, children can easily give false age information and access the service even if they are too young. The 2024 survey on children and media shows that 72 per cent of children aged 9–12 have an account on one or more social media platforms.³ When using such media, children and young people are exposed to content and design that is intended for and tailored to older users.

Article 28 of the DSA introduces a prohibition on behavioural advertising directed at minors where the provider is “aware with reasonable certainty that the recipient of the service is a minor.” The provision requires providers to establish appropriate means of ensuring that the user is not a minor. This places responsibility on providers to develop effective solutions for age verification. This responsibility and obligation may create an incentive for platforms to infer users' age by ana-

lysing behavioural patterns, for example through the use of artificial intelligence. Such a condition may provide an incentive for platforms to verify age by analysing users' behaviour patterns, for example, using artificial intelligence. In its report, the Privacy Commission therefore recommends that service providers be required to apply the precautionary principle to avoid solutions that increase tracking and profiling to map consumers' identities and ages.

In early 2024, the EU adopted a revised regulation on digital identification, the European Digital Identity Framework (eIDAS 2). The aim is to ensure that everyone has access to secure electronic identification in the internal market, among other things, by establishing a “digital identity wallet”. Member States will be responsible for providing citizens with an eID that will be free for everyone. eIDAS 2 requires the largest platforms to offer eID as one of the login methods.

In October 2024, the European Commission announced a tender for an age verification solution to meet obligations under the DSA and eIDAS 2, which will be linked to national eID solutions for age verification. Verification will make it easier to enforce regulations for the protection of children, such as the prohibition on behavioural advertising in the DSA and relevant provisions in the Audiovisual Media Services Directive (AVMSD). See also the discussion of the DSA in section 9.2.2.

Norway will closely monitor the EU's work on age verification, and the Government will consider various solutions to protect children and young people on social media.

9.2.5 Age assurance

Making regulation and other policy instruments in the media sector as platform-neutral as possible has long been a policy aim. Among other things, a key objective of the amendments to the Act relating to the protection of minors against harmful audiovisual programmes, which entered into force on 1 July 2015, was to extend the protection of minors against harmful image programmes to all the major platforms for the dissemination of moving images. The Act contains rules on protective measures to ensure that children below the specified age limit do not have access to the programme. The Act applies to the distribution of moving images on television, through audiovisual on-demand services (such as streaming services), screening in cinemas or other public gatherings,

³ Norwegian Media Authority, 2024b.

and through the sale of videograms (DVD and Blu-ray discs). In relation to cinemas and the sale of videograms, the Act requires age assurance to be carried out on persons who are given access to the programme. For television and audiovisual on-demand services, the Act requires measures to ensure that minors who do not meet the age limit do not “normally” have access to the programme. This can be done through the choice of broadcast time (television) or technical measures (such as PIN codes and passwords). The Government will update the concept of harmfulness in the Act and consider legislative amendments to protect children and young people when encountering new digital media.

In February 2025, the Storting adopted the bill and draft resolution Prop. 66 LS (2023–2024), which extends the scope of the Act to include providers of video-sharing platforms. Video-sharing platforms are services where users can upload video content themselves, and the provider has no editorial control over the content uploaded. Service providers must, among other things, implement appropriate measures to protect minors from harmful or seriously harmful video content. Such measures may include solutions for reporting and flagging content, age-assurance systems, or user-managed access control. The legislative amendments implement the amending directive to the EU Audiovisual Media Services Directive. There are currently few Norwegian video-sharing platforms. However, providers of video-sharing platforms established in other EEA countries are subject to the obligations of the AVMS Directive and are subject to supervision in the country where they are established. For example, major video-sharing platforms such as YouTube, Facebook and Instagram are established in Ireland, and it is therefore Ireland’s media regulator (*Coimisiún na Meán*) that monitors compliance with the Directive’s provisions.

9.3 Strengthening children’s consumer protection in digital media

Consumer protection legislation consists of general regulations, special rules to protect children in relation to marketing, and sector-specific rules to address specific concerns. Together, the legislation helps to protect children from marketing that is inappropriate, potentially harmful, or that may impact their physical or mental health. This includes, for example, rules on the marketing of

Box 9.2 Comments from children and young people: Strengthen children’s consumer protection

Children and young people spend a lot of time on social media and other digital platforms, where they risk being exposed to illegal marketing, manipulative design, and the exploitation of their personal data. The Youth Network demands that the policy for a safe digital upbringing ensures children’s consumer protection and shields them from commercial pressure and the exploitation of their personal data online. The network highlights the significant commercial pressure that children and young people face on major social media platforms and the manipulative marketing they encounter in video games as particularly problematic.

alcohol, tobacco, cosmetic procedures, and gambling.

Marketing of unhealthy food

The marketing of unhealthy food and beverages affects the diets of children and young people and can increase the risk of diet-related illnesses, poor dental health, and overweight and obesity. The Government is committed to ensuring that children and young people enjoy good health and that it is easy for them to make healthy choices in their everyday lives. In April 2025, a regulation was therefore adopted prohibiting the marketing of unhealthy food and beverages specifically targeted at children. The regulation is based on the Norwegian Food and Drink Industry Professional Practices Committee’s self-regulatory Code for marketing of food and drink aimed at children, but extends further on certain points. Among other things, the Government will protect all children up to the age of 18, ensure active supervision, and follow up on violations of the regulation with penalties issued by the Norwegian Directorate of Health. The regulations will therefore protect children from the marketing of unhealthy food and beverages to a greater extent than is currently the case. It will continue to be legal to sell these products to children and young people, but marketing unhealthy products to this group will be illegal.

Advertising in schools

In the white paper Meld. St. 34 (2023–2024), the Government notes that, despite most advertising being prohibited in schools (see Section 27-1 of the Education Act), it remains difficult for many municipalities to prevent pupils from being exposed to marketing by commercial actors and potentially addictive algorithms. There are numerous documented instances of advertising-funded digital resources being used in teaching, despite not being designed for schools. The Government does not want such advertising-funded resources to be used in education. The Norwegian Directorate for Education and Training has previously prepared guidelines on advertising in schools, which, among other things, state that the presence of advertising should not limit the use of information technology in education.⁴ The old guidelines did not take sufficient account of digital developments and their implications for pupils' privacy. The Government will therefore ensure that the guidelines on advertising in schools are updated and will oversee compliance with the legislation, as well as assess whether the current legislation remains adequate in light of technological developments.

Review of consumer protection for children

The Government has conducted a comprehensive review of children's consumer protection in digital media. Ongoing work, such as follow-up of the DSA and the prohibition on behavioural advertising directed at children, is important for strengthening children's consumer protection. Furthermore, there is a need for input into international policy and regulatory development, as well as legislative development in Norway, and for stronger guidance on and enforcement of existing legislation.

Several measures have been implemented to strengthen children's consumer protection.

- The Government has submitted a proposal to the Storting (Norwegian Parliament) for stricter penalties for violations of good marketing practices in relation to children. The Government will implement these rules quickly. The Ministry of Children and Families is continuing to work on a proposal that was under consultation until January 2025 for a new provision in the Marketing Control Act to specifically protect children from marketing on social media and in games.

- Norway has provided input to the European Commission on the need for regulations to better protect children from, among other things, manipulative design, loot boxes and manipulative practices in games, the humanisation of generative AI, and the rules on hidden advertising. The European Commission has announced that it will present proposals for a new Digital Fairness Act (see Box 9.3). The Government will continue to provide input to international policy and regulatory developments to strengthen consumer protection for children, including in relation to manipulative and addictive design, loot boxes and the EU's Digital Fairness Act.
- The Government will investigate how to reduce advertising and exposure to tobacco products, etc., in social media, cf. the Government's tobacco strategy in the white paper on public health (Meld. St. 15 (2022–2023)), *National strategy for reducing social health inequalities*.
- The Government will assess the labelling requirement for retouched (altered) images in the Marketing Control Act in light of the use of AI-generated images in advertising.

Children and young people are influenced by developments and trends in the markets. When the shopping app Temu became available in Norway, children also began using it. In a study by the Consumption Research Norway (SIFO) on platform design and children's digital practices and vulnerability,⁵ children and young people in focus groups shared their experiences and reflections on Temu. Some downloaded and tried the app without buying anything, while others expressed ambivalence about security, ethical issues, and non-compliance with EU regulations. Others made purchases because the selection is large and the prices are too low to resist. The children's statements show that they are affected by similar issues to those of adult consumers. The Government is following up on the challenges of online shopping from countries outside the EEA, including through joint Nordic cooperation.

Supervision and enforcement of consumer regulations

It is important that supervisory authorities actively follow up on existing regulations. Guidance helps to raise awareness of the regulations, while supervision ensures compliance. The possibility of dissuasive penalties helps to ensure that traders

⁴ Norwegian Directorate for Education and Training, 2021.

⁵ Sletteå et al., 2025.

Box 9.3 Digital Fairness Act

In autumn 2024, the European Commission presented a report evaluating whether current consumer protection regulations are adequately designed to safeguard consumer protection in the digital age. The report identified a need to strengthen digital consumer protection. The European Commission has announced that in 2025 it will work on a new regulatory proposal, the Digital Fairness Act, which aims to strengthen consumer protection. The proposal is expected to be presented in 2026.

comply. The Government has therefore increased the Norwegian Consumer Authority's budget to strengthen the supervision of children's consumer protection in digital media. The Government will continue to work towards a more coordinated and powerful enforcement apparatus for children's consumer protection in digital media.

The fact that regulations and enforcement responsibilities are distributed across different agencies can make it more difficult for children and parents to know how to complain about marketing. It can also make it more difficult for businesses that are required to follow the rules to maintain an overview. For example, influencers have varying degrees of professionalism. Some are part of larger enterprises and networks, or have many years of experience. Others have less knowledge of the applicable regulations.

There is a need for greater and more effective cooperation among enforcement authorities to strengthen consumer protection for children, both through guidance and coordinated supervision. The Norwegian Consumer Authority has been tasked with facilitating a more coordinated and effective enforcement apparatus for children's consumer protection in digital media.

New marketing methods and the large volume of advertising in digital media challenge agencies' methods and capacity to detect violations of the law. The Norwegian Consumer Authority has therefore been tasked with investigating and preparing the implementation of digital supervisory tools in the enforcement apparatus for children's consumer protection. The Norwegian Directorate

Box 9.4 International cooperation regarding the gaming industry

The gaming industry is an example of a market that is largely dominated by international actors. The Norwegian Consumer Authority has therefore been a proponent for cooperation with supervisory authorities in other countries to monitor this market. In 2025, this resulted in a joint position and guidance from the EU Consumer Protection Cooperation (CPC) Network on principles for virtual currency in games, which responds to challenges identified by the Norwegian Consumer Council. Among other things, the guidance stipulates that prices shall be stated clearly and unambiguously, and that games shall not require users to purchase more in-game money than they actually need. There is also agreement that anyone who creates games that are not clearly intended for adults only must expect that many of the players will be children. This places specific demands on game design and marketing. It is not permitted to directly exhort children to make purchases or to ask adults to buy things for them.

of Health, in collaboration with the Norwegian Institute of Public Health, has been tasked with describing the extent to which minors are exposed to and purchase alcoholic beverages, tobacco products, and e-cigarettes via social media. Several actors are investigating or implementing new digital tools to enable more and better supervision. Both the Norwegian Media Authority and the Norwegian Cancer Society have used media monitoring to identify problematic marketing. To identify food and beverage advertisements targeting children on social media, SIFO has used a framework developed by the World Health Organisation.⁶

As cross-border enforcement can be difficult in practical or legal terms, international cooperation is important in order to provide the authorities in different countries with a common understanding of the challenges.

⁶ Steinnes et al., 2020.

9.4 Preventing and combating sexual exploitation and abuse

In recent years, the EU has intensified its efforts to combat internet-related abuse of children. In 2020, the European Commission presented an *EU strategy for a more effective fight against child sexual abuse* and in 2022, a proposal for a regulation requiring relevant providers of internet-based services to detect, report, prevent and remove material depicting child sexual abuse on their services.⁷ The Commission believes that the current system, which is based on voluntary tracking and reporting by companies, is insufficient. The proposed regulation requires providers to detect, report, and remove images and videos depicting sexual abuse of children. The Commission also proposes establishing a new independent EU Centre on Child Sexual Abuse. The Centre will assist Member States and companies in implementing the regulations and cooperate with Europol. The regulation will require internet service providers to track, report, and remove images and videos depicting sexual abuse of children. Providers of hosting services or interpersonal communication services must assess the risk of their services being used to disseminate material depicting child abuse or to seek contact with children, known as *grooming*. Providers will also have to propose risk mitigation measures. National authorities will review the risk assessment and may issue tracking orders in cases of significant risk of known or new material or grooming. The proposal may become applicable to Norway through the EEA Agreement.

Furthermore, the Government will develop a system for forwarding content showing child sexual exploitation and abuse of children on the internet to the police. The Government will also participate in European and international cooperation on internet-related abuse of children.

9.5 Regulatory efforts to protect children and young people

Social media is an important meeting place where children and young people can express themselves, but there is also a need to protect them from any harm arising from their use of it. Several legislative amendments are being considered to ensure children's safety online.

⁷ European Commission, 2020; European Commission, 2022b.

9.5.1 Amendment to the Personal Data Act

The Government will raise the age limit in Section 5 of the Personal Data Act for when children can consent to the processing of personal data when using information society services, from 13 to 15 years. The aim is to circulate a proposal to raise the age limit in the Personal Data Act for consultation in 2025. The Convention on the Rights of the Child allows for the introduction of parental consent requirements. This is stated in the UN Committee on the Rights of the Child's General comment No. 25, cf. paragraph 71:

“Where a child's own consent is considered insufficient and parental consent is required to process a child's personal data, States parties should require that organisations processing such data verify that consent is informed, meaningful and given by the child's parent or caregiver.”

Setting an age limit for when children themselves can consent to the processing of personal data when using information society services involves balancing the child's self-determination with their need for protection. Like Norway, Sweden, Finland, and other countries have set the age limit at 13. Most countries within the EEA have set a higher age limit than 13 years. In Denmark, the age limit was changed from 13 to 15 in 2023.

These services have several positive aspects, such as social interaction with friends and family and play and learning. However, they also present a number of challenges in that children may be exposed to harmful or inappropriate content that is not suitable for their age, such as violent or sexual material. Use of these services can lead to the unwanted dissemination of images and other information about children, and in various ways contribute to social pressure, bullying, harassment, marginalisation, and exclusion. The services can also lead to varying degrees of addiction. They may also provide a platform for recruitment into crime or for committing crimes against children. See the discussion of harmful content and use in Chapter 4.

In practice, the use of information society services often involves providers processing personal data about their users. The processing of personal data entails a risk that the data may be misplaced, misused, or otherwise processed in violation of the rules governing its processing. Therefore, the processing poses a risk to children's privacy.

The purpose of raising the age limit from 13 to 15 is to strengthen children’s privacy. Raising the age limit also signals the need for greater awareness, particularly among parents and children, but also among service providers and society in general, of the risks associated with the processing of personal data when using various types of information society services.

9.5.2 Age limit for social media

Current legislation sets age limits on the types of content children can watch on television and at the cinema, as set out in the Act relating to the protection of minors against harmful audiovisual programmes. The Personal Data Act regulates when children can consent to the processing of their personal data when using information society services, such as social media. However, there is no specific age limit for using social media. Most social media platforms have nevertheless set an absolute age limit of 13 years in their terms of use.

The Government will circulate a bill for consultation on introducing an age limit for children’s use of social media, with 15 years as the starting point. The purpose of the proposal is to protect children and young people from the possible harmful effects of social media use, including crime. The proposal will include a definition of social media and requirements for age verification. A new act should not come at the expense of children and young people’s ability to participate in leisure activities and important social communities, and it must be in line with children’s fundamental rights, such as freedom of information, freedom of expression and freedom of association. The Government will therefore also propose exemptions in the new act for video games and services used for communication about, for example, school and leisure activities. Children must be protected from harmful content, abuse, commercial exploitation, surveillance, and misuse of personal data. An age limit on social media could help protect children from bullying and negative impacts on their mental health, for example. Platform providers and commercial operators must take greater responsibility for ensuring that children and young people do not use social media in ways that harm them.

In its report, the Screen Use Committee finds that social media can lead to mental health problems among young people. They point out that

many children are not mature enough to handle the content they see and are vulnerable to manipulative design. The Committee also believes that a common age limit with verification will provide effective protection and prevent inconsistencies in parents’ assessments. At the same time, the Committee believes that it will be challenging to define which services should be covered by a general age limit. The Committee also believes that it is necessary to explore how to establish genuine age limits on social media to safeguard children and young people, and that the rights to privacy, participation, and protection must be balanced. An age limit may interfere with children’s freedom of information and freedom of expression, and their participation in artistic and cultural life online.

The Committee’s report has been circulated for public consultation. Most of the consultation bodies support some form of age limit and highlight the need to balance different rights. There are different views on whether the authorities or the platforms should set age limits, and whether there should be one general limit or different limits for each service.

Box 9.5 Comments from children and young people: Age limits

DigiUngdomspanel, a panel consisting of young people between the ages of 13 and 20, has provided input on age limits. DigiUngdomspanel believed that introducing an age limit on social media protects children from inappropriate content, reduces the risk of online bullying and safeguards their privacy. However, they were also concerned that an age limit could lead to exclusion for children who are not allowed to participate, and that it could be challenging to enforce. Many want an age limit to ensure that children are mature enough to understand the consequences of their actions online and to protect them from harmful content. The young people also pointed out that although many parents want to follow age limits, they often feel pressured to let their children participate in order to avoid exclusion. They believed that stricter enforcement and greater awareness among parents are needed to ensure that age limits are followed.

9.5.3 Parents' commercialisation of their children's upbringing

Some parents use images of their own children in marketing, for example, through sponsored blog posts or social media posts. Commercial publication where parents give consent on behalf of their children before the children are able to understand the consequences and give informed consent can be problematic. There may be a conflict between the interests of children and parents, in which children's rights to information and participation, self-determination, privacy, and data protection are challenged. This must be weighed against parents' rights to make decisions and freedom of expression. When sharing takes place for commercial purposes, the parents' right to make decisions and their freedom of expression should be given less weight than in private settings. There are currently no clear rules governing parents' commercial use of children's personal data.

In its report, the Privacy Commission states that parents should not publish children's personal data, including images, for commercial use. In 2024, the Norwegian Directorate for Children, Youth and Family Affairs was tasked with preparing information for *foreldrehverdag.no* to raise parents' awareness and confidence when managing their children's everyday digital lives. Parents are warned against exposing children on social media in connection with commercial activities. In April 2025, the Government presented a bill on a new Children Act (Prop. 117 L (2024–2025)). The bill stipulates that children have a right to privacy and that parents have an important responsibility to safeguard it. The bill clarifies children's right to refuse to allow their parents to publish images, videos and audio recordings of them on digital platforms, among other places.

The Government will assess whether there is a need for stricter regulation of parents' publication of videos and images of their own children in online marketing. See also the discussion of parents' safeguarding of privacy in sections 6.4.2 and 6.4.3.

9.5.4 Rules for blocking gambling websites

In 2024, the Norwegian Gaming Authority, the Norwegian Media Authority, and the Norwegian Consumer Authority began collaborating on gam-

bling and gambling in video games. The background is that the three agencies have observed a trend over time in which the boundary between gambling and video games is blurring. Gambling and gambling-like elements have become an increasingly common part of video games, and in several cases, gambling based on the content of video games has developed. Examples of this are loot boxes, in-game purchases, and *skin betting*. See also the definitions section in 3.2.2. As part of the collaboration, the agencies will look more closely at how consumers, especially children and young people, can be better protected under current regulations and whether changes are needed. One of the objectives of the collaboration project is to strengthen the enforcement of current regulations on gambling and video games.

The Gambling Games Act regulates gambling, which is defined as participants who, "in exchange for a stake", can win a "prize of financial value" and where "the outcome is, in whole or in part, random". In such settings, virtual gaming currency and skins are means of payment on a par with ordinary currency and may constitute a *stake*. Skin betting is considered gambling if the conditions of the Gambling Games Act regarding stakes, prizes of financial value and wholly or partly random outcomes are met, and if the website is aimed at the Norwegian market. The measures in the Gambling Games Act may be used in such cases. The Norwegian Gaming Authority considers gambling sites which enable login through digital distribution platforms for video games, such as Steam or Roblox, and which target the Norwegian market, to be gambling sites targeting the Norwegian market. The Government will monitor developments in young people's gambling habits and block websites that offer illegal gambling involving skins, virtual gaming currency, and similar items.

New DNS-blocking rules entered into force on 1 January 2025. DNS blocking prevents access to certain websites by blocking their domain names. The aim is to limit the availability of gambling without a Norwegian licence in order to protect vulnerable players. The Norwegian Gaming Authority can require internet providers to implement DNS blocking of websites that offer illegal gambling in Norway. From 1 April 2025, several such websites were blocked, including websites offering skin betting and Robux betting.

10 Policies and measures shall be comprehensive and evidence-based



Figure 10.1

A number of public authorities are responsible for ensuring that children have a safe upbringing, including when they are online. It is a challenge that policies and measures are not always coordinated and that the evidence base for policy development is insufficient.

The Government aims to develop a comprehensive, evidence-based policy for the upbringing of children and young people in a digital society that also takes into account the right of children to be heard in matters that concern and affect them. When the everyday lives of children and young people are influenced by digital tools from the moment they wake up until they go to sleep, society must listen to their perspective. Children's participation is a key consideration in efforts to ensure a safe upbringing in a digital society. Furthermore, there is a need for coordinated cross-sectoral cooperation, strengthened research, and the sharing and dissemination of knowledge in the ongoing work on digital safety in children's upbringing. In a globalised world, international cooperation is essential, and the Government will continue to monitor international developments in this area.

The Government will:

- Work to establish Nordic cooperation on children's digital upbringing
- Strengthen cooperation between public authorities and the voluntary sector on children's digital upbringing
- Continue the cooperation at the directorate level on digital safety in children's upbringing
- Strengthen research and dissemination of digital practices in schools through a research programme for digitalisation and digital competence in kindergartens and schools
- Strengthen the coordination of the government ministries' research efforts on children's digital upbringing
- Participate in the *EU Kids Online* survey on children's online opportunities, risks, and safety
- Strengthen the evidence base and research on the sexual exploitation of children and young people online
- Safeguard children's rights in policy development on digitalisation

10.1 Strengthening the participation of children and young people

The Government will emphasise the importance of children and young people's participation in the development of policy and measures, including in the digital environment. Systems for participation can help ensure that the voices of children and young people are heard in decision-making processes that affect them. This is both a democratic right and a human right enshrined in the Convention on the Rights of the Child. Taking into account the perspectives of children and young people is important for decision-making and can help to improve services and solutions that take their needs into account. This may be particularly relevant for children in vulnerable situations, where it is important to have a safe and child-friendly framework for participation and to ensure that their rights and privacy are protected.

Systematic participation can contribute to higher-quality public services and policy-making. To achieve this, systems are needed through accessible and inclusive channels for participation. This can help to ensure that children and young people who are not organised in interest groups are also included and that children and young people in different life situations are taken into account. The Government will safeguard children's rights in policy development on digitalisation.

Attention to children's participation has increased in recent years. Several arenas for children's participation have been established to help ensure that policy development is based on children's needs. For example, several youth panels have been established over time to advise the Government on specific topics and processes.

The Ministry of Children and Families will continue to strengthen children and young people's rights to participate at the system level, so that, as a group, they have the opportunity to influence the design of services and policies that affect them.

The Norwegian Directorate for Children, Youth and Family Affairs' participation efforts

The Government has decided that the role of the Norwegian Directorate for Children, Youth and Family Affairs as a national expert environment for the participation of children and young people should be clarified and further developed. Among other things, the Directorate will contribute to

Box 10.1 Comments from children and young people on participation

The Youth Network emphasises that the participation of children and young people is essential and fundamental for effective policy development. The participation of children and young people in the development of new policies leads to better, more targeted, and effective measures and services. Participation is an ongoing effort to involve children in shaping policies and measures that affect their rights in the digital world.

strengthening expertise regarding participation involving children, offer professional advice, improve structures, and promote a more comprehensive perspective on children and their views among central government authorities, municipalities, county authorities, and relevant actors in the area of children and young people.

On behalf of the Norwegian Directorate for Children, Youth and Family Affairs, Rambøll mapped participation at the system level in 2024.¹ The assessment indicates that participation at the national level is most effective for service development, but presents more difficulties for policy development. Children and young people can participate in various ways. Participation can, for example, be initiated and managed by children and young people themselves or by public authorities, service providers, voluntary organisations, or research institutes. A good example of an initiative that gives young people a stronger voice in local government is the five-year project *Ung medvirkning* (Youth Participation), which is funded by the Norwegian Directorate for Children, Youth and Family Affairs, and aims to map how youth participation takes place in Norwegian municipalities. In addition to strengthening participation processes, it aims to promote good conditions for upbringing. Young people get to participate in decisions that affect their lives and help shape policies and projects that improve the local communities.²

¹ Rambøll, 2024.

² Lindseth Bygdås et al., 2022.

DigiUngdomspanel

DigiUngdomspanel is *DigiUng*'s user participation body and comprises 27 young people aged 13 to 21. The young people come from all over the country and have different backgrounds that reflect Norway's diverse youth. The panel contributes to improving the quality of services and ensures that young people's opinions are taken into account when developing services and products. The panel has also contributed comments to this white paper. See also the discussion of *DigiUng* in section 8.2.

The Norwegian Media Authority's participation efforts

The Norwegian Media Authority established a Youth Network consisting of representatives from relevant children's and youth organisations. The network provided comments on all areas of the action plan for a safe digital upbringing. The Youth Network has also provided comments on the work on this white paper. See also section 1.3.2.

Youth participation is a contractual activity in the Norwegian Media Authority's EU project *Better Internet for Kids*, and the Norwegian Media Authority has developed a separate guide for youth participation. In the period 2024–2026, the Norwegian Media Authority will use such participation for co-research, both in the design of surveys and in the interpretation of data, in connection with the large population surveys on children and young people's media use. A youth representative has served on the Advisory Board of the Safer Internet Centre (see section 10.2). Young people from all over Europe participate in the Advisory Board and discuss challenges in everyday digital life. In addition, the Norwegian Media Authority uses a children and youth panel to gather comments and feedback, for example, in its work on guidelines for age classification of audiovisual programmes. The aim is to involve children and young people of different ages and include them in the work of setting age limits. Through the panels, children and young people contribute relevant experiences and perspectives to the assessment of age limits for films and programmes.

Advice on establishing and recruiting for youth panels

Youth panels can provide comments on public authorities' policy and service development. The authorities can establish youth panels when they

need advice from young people and when a youth panel would be a good way to obtain comments. The Ministry of Children and Families, in collaboration with the Norwegian Directorate for Children, Youth and Family Affairs, has developed principles and advice on how the government ministries can establish and recruit youth panels.³ The establishment of youth panels is a follow-up to young people's right to participation. The use of youth panels should supplement existing influence bodies and participation structures.

10.2 Coordination and interaction

The white paper on art and culture for, with, and by children (Meld. St. 18 (2020–2021)) described the need for a broad approach and good cooperation between authorities to ensure a safe digital upbringing for all children. The work to ensure a safe upbringing in a digital society encompasses several policy areas and the responsibilities of several government ministries. In recent years, coordination and cooperation on policies for children's digital upbringing have been strengthened, and several arenas for cooperation have been established.

The Ministry of Children and Families leads an inter-ministerial working group that coordinates efforts to ensure a safe upbringing in a digital society at the ministerial level. The Ministry of Digitalisation and Public Governance, the Ministry of Health and Care Services, the Ministry of Justice and Public Security, the Ministry of Education and Research, and the Ministry of Culture and Equality participate in the group.

The Norwegian Media Authority coordinates efforts to ensure a safe upbringing in a digital society at the directorate level and has established a group consisting of directorates and supervisory authorities responsible for relevant areas of responsibility. The group's overall task is to ensure better coordination and more effective and coordinated central government action. The Norwegian Directorate for Children, Youth and Family Affairs, the Norwegian Data Protection Authority, the Norwegian Directorate of Health, the Norwegian Directorate for Education and Training, the Norwegian National Police Directorate, and the Norwegian Consumer Authority are taking part. The group has developed an action plan for a safe digital upbringing to follow up on the goals set out in the national strategy for a safe digital

³ Norwegian Ministry of Children and Families, 2022.

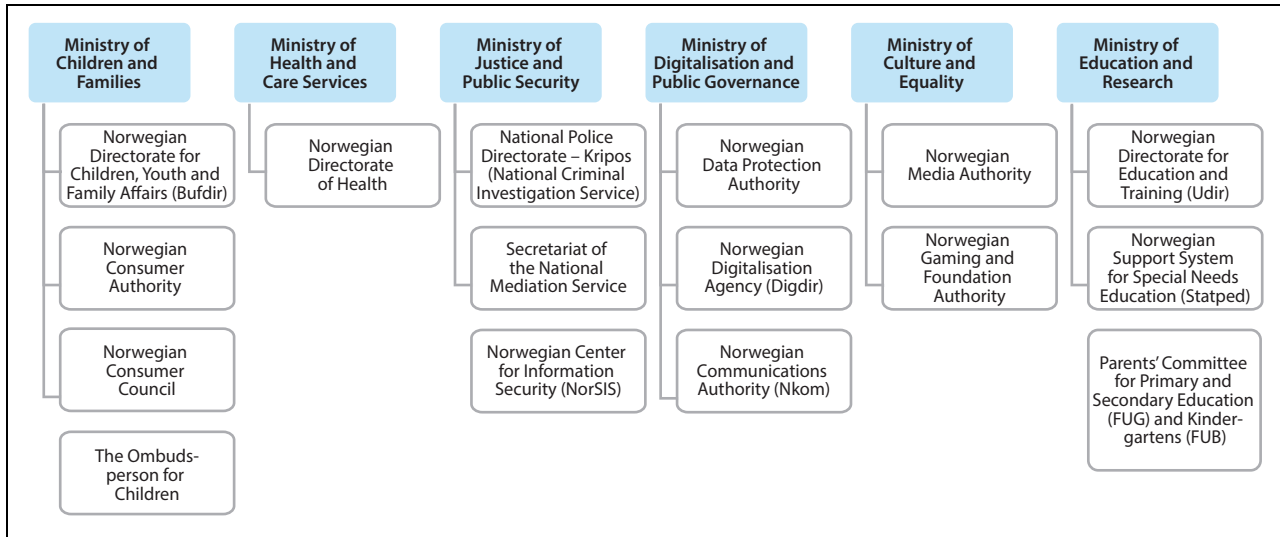


Figure 10.2 Overview of government ministries, subordinate agencies, and associated entities involved in efforts to ensure a safe upbringing in a digital society

upbringing. In the action plan, the directorate group notes the need for more systematic knowledge sharing among agencies working in this area.⁴ The Government will continue the cooperation at the directorate level on digital safety in children's upbringing.

The Norwegian Media Authority receives funding from the European Commission to serve as the *Norwegian Safer Internet Centre* (NCIS). Such centres have been set up across Europe with EU funding. The centres provide information, advice and assistance to children, parents, teachers and caregivers on digital upbringing and combating online child sexual abuse. The Norwegian Media Authority and the helpline *Kors på halsen* (Cross my heart), run by the Norwegian Red Cross, are national coordinators for promoting a safer digital everyday life for children and young people. *Safer Internet Day* is celebrated every year in February throughout Europe, including Norway. The main goal is to raise awareness and improve media literacy among children, parents, teachers, and other professionals who work with children on online issues and risks. In Norway, the Norwegian Media Authority organises *Safer Internet Day*.

Several supervisory authorities and directorates collaborate on enforcement, guidance and exchange of experience. For example, the Norwegian Consumer Authority leads a supervisory forum to strengthen supervision in the digital

domain. The Norwegian Data Protection Authority and the Norwegian Competition Authority are permanent members of this forum. The Norwegian Consumer Authority will contribute to further coordination and cooperation on effective enforcement of consumer protection for children across sectors. Furthermore, the Norwegian Communications Authority (Nkom) has been designated as Norway's Digital Services Coordinator (DSC) under the Digital Services Act (DSA). The coordinator is responsible for coordinating all national-level regulatory activities and shall ensure a good flow of information and the harmonised application of the regulations.

Cooperation with the voluntary sector

Organisations and the voluntary sector do important work to improve the digital upbringing of children and young people. Organisations, services and other actors interact with children, young people, and parents in their local communities, through school, leisure activities, and voluntary work. They are also important partners for central and local government services. For example, a children's network has been established to address digital issues, consisting of the Norwegian Consumer Council, the Ombudsperson for Children, the Equality and Anti-Discrimination Ombud, Amnesty International Norway, Press – Save the Children Norway Youth, UNICEF Norway, Save the Children Norway, the Norwegian Cancer Society, and the National Association for Public Health. Furthermore, the voluntary sector

⁴ Norwegian Media Authority, 2024h.

can help to strengthen children’s digital competence, prevent risks such as online bullying and digital exclusion, and help to ensure that children have opportunities to participate safely and actively when they are online, contributing to both prevention and support. The Government will strengthen cooperation between public authorities and the voluntary sector on children’s digital upbringing.

10.3 International cooperation

There is considerable international interest in developing effective policies on digital safety during children’s upbringing. Several international organisations have taken the initiative to develop regulations, guidelines, and guidance to assist national authorities in their work to ensure children’s safe digital upbringing. The Government will work to establish Nordic cooperation on children’s digital upbringing.

The European Union (EU)

The EU plays an important role in regulating platform companies and digital services. See the discussion of the EU’s Digital Services Act (DSA) in section 9.2 and the discussion of the European Commission’s proposal for rules to prevent and combat child sexual abuse online in section 9.4. The EU is also working to make the internet safer for children and launched the *European strategy for a better Internet for kids (BIK+)* in 2022.⁵ The strategy focuses on three main points: better protection for children, better skills to make sensible choices online, and respect for children’s views in the digital environment. Norway has participated in the *EU Internet Forum*, which promotes dialogue between Member States and internet companies on combating such abuse.

The United Nations (UN)

The UN and several UN agencies have initiatives to protect children online. In 2021, the UN Committee on the Rights of the Child issued its General comment No. 25 on children’s rights in relation to the digital environment (see section 1.3.1). In 2022, the UN Economic and Social Council (ECOSOC) adopted a resolution strengthening national and international efforts, including those of the private sector, to protect children from sex-

ual exploitation and abuse on the internet. The International Telecommunication Union (ITU) has developed a comprehensive set of recommendations for all relevant partners on how to contribute to the development of a safe digital environment for children and young people. The ITU has also established the Child Online Protection Initiative network to promote awareness of child safety in the digital environment and to develop practical tools for use by authorities, businesses and teachers.

Furthermore, the United Nations Children’s Fund (UNICEF) supports work to prevent the sexual abuse of children on the internet in over 20 countries. In 2022, the World Health Organisation (WHO) published a report on the prevention of online violence against children. The report emphasises the importance of implementing educational programmes for children and parents. The United Nations Educational, Scientific and Cultural Organisation (UNESCO) developed Guidelines for the Governance of Digital Platforms in 2023.⁶ The guidelines set out responsibilities and obligations for states, digital platforms, civil society, the media, academia, and the technology industry, as well as other actors in the field, to contribute to freedom of expression and access to information. Consideration for children and young people is part of the guidelines.

Council of Europe

The Council of Europe’s *Guidelines to respect, protect and fulfil the rights of the child in the digital environment* were published in 2018. The guidelines are intended to help authorities and others protect children and promote their participation in the digital environment. Furthermore, the Council of Europe has presented the *Council of Europe Strategy for the Rights of the Child (2022–2027)*. One of the goals of the strategy is to provide access to and safe use of technology. The Council of Europe emphasises children’s right to participate in and protection of their rights in the digital environment. The Council of Europe also points out that it is important for parents and adults who work with children to have knowledge about how to keep children safe online.

Nordic Council of Ministers

Children and young people’s rights are an area in which the Nordic countries work comprehen-

⁵ European Commission, 2022a.

⁶ UNESCO, 2023.

sively and cross-sectorally through cooperation within the Nordic Council of Ministers. One of the Nordic Council of Ministers' focus areas is the living conditions of children and young people in the Nordic region. The Nordic countries have several councils and recommendations regarding how children spend their time, including screen time, in the realm of public health. Under the Nordic Committee for Senior Officials for Health and Social Affairs (EK-S), Norway will take the initiative to share Nordic knowledge and experience, as well as to coordinate recommendations and regulations related to how children and young people spend their time.

Another of the Nordic Council of Ministers' overall policy priorities towards 2030 is for the Nordic region to strike a responsible and ethical balance in the development of the digital society. A safe digital upbringing is therefore a topic that is particularly relevant for the activities of the Nordic Council of Ministers in the coming years.

The Nordic Council of Ministers' cooperation programmes, together with its policy priorities, guide its initiatives and activities. Among other things, the Nordic Council of Ministers has decided that education shall contribute to strengthening digital competence and the ability to navigate a new media and information reality. Furthermore, the Nordic Council of Ministers promotes the need for both frameworks and responsible use of technology in education.⁷

The Nordic Council of Ministers has also adopted a goal of strengthening Nordic cooperation on cultural and media policy challenges arising from new technology, artificial intelligence (AI), and the influence of big tech on democratic discourse, including their impact on the welfare and well-being of children and young people.⁸

The Nordic Council of Ministers has decided that the recommendation for a safe and democratic internet for children and young people should be followed up in the period 2024–2026. The recommendations are presented in a report from the Nordic Think Tank for Tech and Democracy on how to safeguard democratic debate in the Nordic region in an age dominated by platform companies. A Nordic analysis of research and knowledge on the impact of social media on the well-being of children and young people will be prepared, along with recommendations for joint Nordic initiatives. At the same time, a civil society report will be produced in

which children and young people themselves will have their say.⁹

Organisation for Economic Co-operation and Development (OECD)

In May 2021, the OECD adopted a recommendation on children in the digital environment.¹⁰ The recommendation outlines principles for ensuring a safe and beneficial digital environment for children.

10.4 Knowledge development

In General comment No. 25, the UN Committee on the Rights of the Child recommends ensuring that data is collected for research on the digital environment, its impact on children's lives and rights, and the effects of government measures. In recent years, a number of studies have concluded that there is a need for a better evidence base on children's digital upbringing.

10.4.1 Research needs

A key part of the Social Media Harms Committee's remit was to map and compile knowledge about the harmful effects of different types of media content and to assess the need for further studies or research in this area. The Committee concluded that there is little research on the harmful effects of media on Norwegian or Nordic children. They also highlighted the need for methodological innovation among researchers in order to find better and more precise ways of investigating the effects. The Screen Use Committee points out that studies are needed to shed light on and demonstrate causal links between screen use and various outcomes such as health, learning, and quality of life. Furthermore, there is a need for research on interventions that can help children and young people use screens in a healthy and balanced way. They also believe that it is important to include children's own experiences and views in the research in order to gain a more nuanced understanding of how they experience and use technology. In addition, they believe that research is needed on how different activities and technologies can support children's development and needs, including how technology can be used positively in learning and leisure.

⁷ Nordic Council of Ministers, 2024b.

⁸ Nordic Council of Ministers, 2024a.

⁹ Nordic Welfare Centre, 2024.

¹⁰ OECD, 2021.

10.4.2 Strengthened research efforts

The Government has strengthened research efforts in several areas relevant to children's digital upbringing, and research has been initiated under the auspices of several government ministries and directorates. The Government will strengthen the coordination of the ministries' research efforts on children's digital upbringing.

National focus on artificial intelligence

The Government has decided to increase research efforts on artificial intelligence (AI) and digital technologies by at least NOK 1 billion over the next five years. The initiative has three main tracks:

1. research on the consequences of AI and other digital technologies for society;
2. digital technologies as a standalone research area; and
3. research on how digital technologies can be used for innovation in business and the public sector;

Key themes in main track 1 are democracy, trust, ethics, economics, legal protection, legal regulations, privacy, teaching and learning, art, and culture. These are topics that are relevant to children and young people growing up in a digital society.

In 2024, the Research Council of Norway announced funding to establish four to six research centres on artificial intelligence (AI centres). The centres will conduct high-quality AI research on issues where interdisciplinary research and collaboration across sectors and institutions are necessary to respond to the challenges facing society. Each AI centre will have a budget of NOK 75–200 million and a five-year duration, starting in 2025. Each AI centre is expected to cover at least two of the initiative's main tracks, and together the centres will cover all three.

Prevalence study on vulnerability and concerns about crime

The Ministry of Justice and Public Security has commissioned the Norwegian Centre for Violence and Traumatic Stress Studies (NKVTS) to conduct a survey on vulnerability to and concerns about crime, including health consequences for young people. The study will include young people aged 12–16 from around 80 upper secondary schools. The background for the study is that

international research shows that children and young people are far more vulnerable to crime than adults, especially violent crime. There is a need for knowledge about the situation in Norway, about the connections between vulnerability at home, online, at school, in the local community, and in public spaces, and about the significance of these for the development of health problems. The Government wants to strengthen the evidence base and research on the sexual exploitation of children and young people online.

Research programme for digitalisation and digital competence in kindergartens and schools

The Norwegian Directorate for Education and Training has established a research programme to provide better and more systematic knowledge about digitalisation and digital competence in kindergartens and schools. The research programme will run until 2030, and its overall objective is to develop new knowledge about digitalisation in kindergartens and schools. This includes research on both professional digital competence and the use of digital solutions in teaching and administration. The programme will also contribute to better dissemination of research results to practitioners and decision-makers. Thereby, the Government aims to strengthen research and dissemination of digital practices.

Norway's participation in EU Kids Online

In 2024 and 2025, the Government has allocated NOK 3.5 million to the University of Oslo for Norway to participate in the EU Kids Online survey on children's online opportunities, risks, and safety. The aim of the survey is to enhance understanding of children's and parents' use of the internet and new online technology. The survey explores the opportunities and risks associated with children and young people's use of the internet, as well as parents' knowledge and role. The survey was last conducted in 2018. The survey provides representative and comparable data over time and across European countries.

The social mission of including children and young people

In autumn 2022, the Government presented its plans for a targeted social mission of including children and young people in the white paper the long-term plan for research and higher education 2023–2032 (Meld. St. 5 (2022–2023)). In 2025, the

Government will initiate this social mission, which will be a ten-year effort leading up to 2035. A targeted social mission involves mobilising the whole of society, including the public sector, voluntary organisations, and the business sector, to solve a complex social challenge. The vision for the work is 'No child or young person left behind!'. The overall goal is to significantly reduce exclusion among children and young people by 2035. Research shows that vulnerable children

and young people are also at greater risk in the digital environment. The target group is children and young people (aged 0–29) who, for various reasons, are at risk of being marginalised or excluded, or children and young people who are already experiencing exclusion. At the same time, the work is not limited to targeted measures. In terms of measures, broad preventive and universal measures for all children and young people are also relevant.

11 Economic and administrative consequences

The white paper describes how the Government will strengthen and further develop its efforts to ensure that children and young people have a safe, active, and participatory upbringing in a digital society. This is the first white paper on the upbringing of children and young people in a digital society, and it will contribute to a more comprehensive policy in this area. The report provides a broad overview of the characteristics of children and young people's upbringing today. It proposes educational, legal, and economic measures that, together, could lead to better regulation of digital services and platforms, public services tailored to children's needs, competent and supportive parents, safe children, better cooperation between different sectors, and a stronger evidence base for policy development. The knowledge base underlying the white paper shows that there are both positive and negative effects of internet and screen use. The Government believes that society currently does not sufficiently protect children.

In general, measures that support children and young people in having a good upbringing can have positive effects for both children and society in the long term. Reducing the negative consequences of internet use can contribute to better mental health, better sleep, and improved learning and concentration in children. This may also lead to better school performance. Furthermore, measures aimed at promoting opportunities for children and young people online, such as measures to improve information and increase competence, could yield benefits in the form of knowledge, inclusion, and increased participation in society. The measures will also provide more opportunities for children and young people to participate and express themselves. The socioeconomic effects have not been quantified to a significant degree.

Several of the measures in the white paper are already adopted policies discussed in other documents (see Box 1.2). The measures are covered by the government ministries' or directorates' current budgetary frameworks. Funds have been allocated in the 2025 National Budget for mea-

asures in this white paper. A total increase of NOK 7 million has been allocated to work on a safe upbringing in a digital society and age limits for social media. This includes NOK 2.5 million from the Ministry of Children and Families' budget for a study on the setting and enforcement of age limits for social media, as well as knowledge and information about social media. Furthermore, the Norwegian Data Protection Authority has been allocated NOK 1.5 million to strengthen its work on children and age limits, including oversight of the Personal Data Act. The Norwegian Consumer Authority has also been allocated NOK 2.5 million to strengthen its supervision of consumer protection for children in digital media. In addition, the *Barnevakten* foundation has been allocated NOK 0.5 million to develop and increase the accessibility of information about children and social media to children, parents, and adults who work with children. In terms of research, the Government has allocated NOK 3.5 million to the University of Oslo in 2024 and 2025 to co-finance Norway's participation in the international survey *EU Kids Online*. In the Revised National Budget for 2025, the Government has proposed prioritising NOK 2.5 million to strengthen assistance to children and young people who are subjected to the sharing of images and videos online without their consent.

Several of the measures in the white paper concern investigating legislative amendments, including the enactment of age limits. The investigation work itself will not have any financial consequences beyond the administrative costs incurred by the government ministries and directorates involved. The measures recommended as a result of the investigations may have consequences, including for providers of digital services and platforms, in the form of closer supervision, reporting, and new requirements that may affect the operations of the enterprises. The consequences of the measures will be assessed, and the parties concerned will have the opportunity to be heard in the customary manner.

Norwegian Ministry of Children and Families

r e c o m m e n d s :

That the recommendation from the Ministry of Children and Families of 10 June 2025 concerning Safe Upbringing in a Digital Society be submitted to the Storting.

Appendix 1

Involvement and comments from children, young people, and other actors

1 Comments and participation from children and young people

The Ministry of Children and Families has gathered the views of children and young people through, among other things, regular dialogue between the Ministry and children's and youth voluntary organisations and representatives from the county authorities' youth councils. Separate consultation processes with young people have also been organised.

The county authorities' youth councils

All county authorities' youth councils in Norway were invited to submit written comments on the white paper. They were asked what they thought was important for a white paper to address. The comments from young people have helped shape the content of the white paper. The youth councils have provided comments on what they believe is good and not good about participating digitally, what they would like to know more about in terms of using digital platforms, and what they would like adults to better understand about their everyday digital lives. The young people also provided comments on how parents can become more involved in their children's everyday online lives.

The Minister for Children and Families holds an annual dialogue forum with youth representatives from all the county authorities' youth councils. The youth representatives were given the opportunity to provide comments on the work on the white paper.

Child and youth volunteer organisations

Child and youth organisations are important voices for children and young people. The organisations have provided comments on the white paper, including at the annual contact conference between the Minister of Children and Families and children and youth volunteers. The contact

conference is an important meeting place between the Minister of Children and Families and child and youth volunteer organisations. Twenty organisations provided comments on the topic of "future organisations and the digitalisation of children's leisure time". The Ministry of Children and Families has also engaged in dialogue with child and youth volunteer organisations about the work on the white paper through biannual contact meetings between umbrella organisations in the field and the Ministry.

Survey of young people on ung.no

The Norwegian Directorate for Children, Youth and Family Affairs was commissioned to conduct a survey among children and young people. Respondents were recruited via *ung.no*, the public information channel for young people. The purpose of the survey was to gather comments from children and young people. 1,017 children and young people answered questions about social media, age limits, privacy, digital competence, and artificial intelligence. Given the scope and methodology of the survey, it does not carry the same weight as research conducted in the field. Nevertheless, it is interesting to compare the responses in this survey with responses in other surveys that ask the same or similar questions.

Consultation meetings with DigiUngdomspanel

DigiUngdomspanel is *DigiUng*'s user participation body and comprises 27 young people aged 13–21 from across Norway. The young people reflect Norway's diverse youth. The Ministry held a consultation meeting where *DigiUngdomspanel* was asked for comments on what the white paper should address and on the challenges in this field that politicians should address. In addition, the young people were asked questions about their digital leisure time and what opportunities and challenges they experience growing up with the internet.

Youth Network for work on a safe digital upbringing

The Norwegian Media Authority established a Youth Network in connection with the preparation of the action plan for a safe digital upbringing. The Youth Network consists of representatives from the Norwegian Children and Youth Council (LNU), the School Student Union of Norway, Press – Save the Children Youth Norway, Youth Work Norway, KANDU – Creative Active Norwegian Computer Youth, Hyperion – Norwegian Association for Fantastic Activities, *Skeiv Ungdom* (Queer Youth), Stop Hate Speech, LightUp Norway and SNU – *Seksualpolitisk Nettverk for Ungdom* (Sexual Rights Network for Youth). In the work on the white paper, the network has assisted in various phases, both in formulating questions to be used to gather the views of various stakeholders and in drafting the content of the white paper. They have also been asked to provide comments on specific parts of the white paper. In August 2023, the Youth Network submitted its demands to the Minister of Children and Families on what it believes can provide a safe digital upbringing.

2 Other comments

Consultation meetings with relevant actors

The Ministry of Children and Families has held several consultation meetings with non-profit

organisations, social media actors, and technology industry actors. These are actors who play a role in children and young people's digital upbringing in various ways. Save the Children Norway, *Barnvakten*, the Norwegian Red Cross, and UNICEF participated in the consultation meeting with non-profit organisations. The social media actors who participated in the consultation meeting included TikTok, Meta, Google, and Snapchat. ICT Norway, Sopra Steria, Telenor, Telia, Microsoft, and Vipps participated in the consultation meeting with actors in the technology industry. A separate consultation meeting on children's consumer protection in digital media was held in spring 2023, during which comments were requested for the Ministry's review. A consultation meeting on age limits and social media was also held in May 2024.

Survey of parents

The Norwegian Directorate for Children, Youth and Family Affairs has conducted a survey to gather parents' comments. The parent survey was answered by 701 parents with children aged 4–17. Given the scope and methodology of the survey, the responses must be used with caution when making general statements about Norwegian parents' views on various aspects of children's digital upbringing. Nevertheless, the comments from parents collected through the survey do say something about the issues that concern them about children's digital upbringing.

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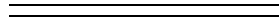
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Published by:
Norwegian Ministry of Children and Families

Additional copies may be ordered from:
Norwegian Government Security and Service
Organisation
publikasjoner.dep.no
Telephone: + 47 22 24 00 00
Publications are also available on:
www.government.no

Cover and chapter images: Melkeveien Designkontor AS

