GISAD comment on https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/13160-Better-internet-for-children-strategy-update_en .

GISAD (Global Institute for Structure relevance, Anonymity and Decentralisation i.G.) is an institute in founding. GISAD wants to develop a digital system (EU-D-S) from the perspective of the citizens of Europe, which can hold its own in system competition with gatekeepers and a social credit system.

The aim of GISAD is to support the creation of a holistic Marshall Plan, as called for by the President of the European Commission, Ursula von der Leyen. The core of the Marshall Plan must be a digital concept adapted to civil rights and diversity. If individual measures are taken without an overall system of their own, Europe runs the risk of losing the system competition to other economic areas such as a centrally controlled China.

- GISAD's opinion is subject to the proviso that it is to be as part of an overall digital concept understood (multiple use of the same infrastructure without additional costs).

GISAD has defined three goals on which a Marshall Plan should focus:

1. The optimal refinement and simple exploitation of digital data, while maintaining diversity and performance-adopted involvement of all parties involved in the value creation.
2. The stigma-free, lifelong digital inclusion of all citizens with incentives for self-development.
3. The digital guarantee of the necessary state tasks to maintain security for citizens, the economy and the state, while preserving pre-digital democratic achievements.

Challenges:

GISAD welcomes the European Strategy for a Better Internet for Children. However, the effects of a general internet approach are particularly strong on children, which also leads to negative emotions among adults, resulting in hate speech and disinformation.

This is why GISAD considers individual initiatives for children to be questionable. It is better to integrate children into a concept of lifelong learning in which they learn a critical approach to the internet already in kindergarten, see http://gisad.eu/de-eu-initiative-online-und-fernunterricht-in-primar-und-sekundarschulen/ .

Children are particularly vulnerable to sexual abuse. However, GISAD strongly advises the Commission not to fight the symptoms to the detriment of civil rights, see http://gisad.eu/en-eu-initiative-combating-child-sexual-abuse-review-of-eu-rules/ .

The following general measures also significantly increase the quality of the internet for children:

- With the right for every child from 10 years of age to have internet access, which may not be restricted by parents. This is the only way for children to inform themselves about their parents' misbehaviour and to complain to other children or counselling centres.
- With the possibility to move anonymously and without stigmatisation as a child in the EU-D-S and to be able to exchange information with other children, but to be identifiable in individual cases and after a court order.

- With the incentive of a digital citizen's money, all new data should be on the internet assessed by several evaluators and entered into the EU-D-S with comments.

The following special measures should be for children added:

- Clearly online visible contact persons specialised in the age profile deposited with the child. The age profile can be stored in the PDS (personal digital system) without third parties being able to see it.
- Raters can add age restrictions to specific content, which children cannot then view in the EU-D-S.
- In principle, children should have the same user rights as adults in the EU-D-S; general bans tend to hinder children's development. However, could be the general Internet blocked for children via the PDS. If all public posts, especially those on the Internet, are in the EU-D-S linked together with a rating, there is no reason for children to be outside the EU-D-S.
- If a rater detects misbehaviour of a child in his or her post, can be a warning chain started, up to and including the involvement of a psychologist. In this way, at an early stage are undesirable developments recognised proactively. Initial assistance can be without having to remove the anonymity given of the respective child.
- It is especially important for children to receive content from children of the same age. They have to be sure not to exchange on the internet with an adult, but with a child. This can be by age groups regulated stored in the PDS. The age group of the author at the time of publication is then stored for contribution.
- The EU-D-S is into approximately 1,000 globally standardised categories divided. Usually, the user can make additional settings for each category. For children could be special high-quality content displayed on individual topics according to their age group.

As general rule one can say that bans do not help. Children find ways to circumvent them and then all the more elude the access of adults. Children must constantly test their limits. In an environment where they can get help at any time, they must be able to test themselves. Because even an EU-D-S cannot prevent the dangers in real life, it can only prepare for them!