

## Growing up in an online world: a national conversation

UK Government Consultation Response, May 2026

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Children First is Scotland's national children's charity. We stand up for children, keep them safe and support them to recover from trauma and abuse through our national and local services.

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*"The internet itself is not evil; it is how it is used. Social media can be a space where young people have people they can talk to that share their interests and passions.*

*"But we are watching childhoods being ripped away because of the way social media is normalising harm and unhealthy expectations. To protect children and young people we must create spaces for them outside social media."*

*Young person supported by Children First, 18 years old.*

We know that online harm is no longer a marginal issue. It is the childhood emergency of our time. Families are navigating challenges that did not exist a generation ago, often without the support they need.

Children are routinely exposed to harmful content, including violent, sexual and exploitative material.<sup>1</sup> Addictive platform design means screen time is at record highs, with clear consequences for children's mental and physical health.<sup>2</sup> It shapes how children learn, communicate and form relationships.

Regulation has a role, but restrictions or 'bans' alone will not deliver the change children and families need. Government must be clear on this and avoid reaching for 'quick fixes' that will fail to deliver practical improvements.

Children First are calling on the UK and Scottish Governments to work together to go beyond a ban and tackle these deep-rooted problems through a wider package of measures, and a public health approach.

This should support open, honest and informed conversations between children and the adults they trust. This will be the most effective defence to many of the online harms children face.

Both the UK and Scottish Governments must respond to the scale of challenge; with the urgency it demands. We are calling on both governments to:

### **1. Listen to children and families.**

Our response to this consultation has been closely informed by the voices of the children and families we work alongside. Government must also continue to listen to those voices as these policies develop further. Children's real experiences need to be better understood, so they can be better protected.

With the pace of change, and the way in which algorithms deliver divided experiences across the same platforms, children's experiences in online spaces are fundamentally different to the adults around them and are constantly changing. There must be a constant and well-resourced line of communication

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<sup>1</sup> [Children's experiences of using online services](#)

<sup>2</sup> [Scotland must act now on screen time in the under-fives | University of Strathclyde](#)

set up between children and government decision makers to make sure that these policy interventions have the impact intended.

Their views and experienced need to be set in the context of their developmental stage and the impact this has on their critical thinking capacity. This should also be done in the context of children's rights and the General Principles of the UNCRC, and their Article 19 right to be protected from violence, abuse and neglect.

## **2. Hold tech firms accountable.**

It is not enough to simply hope that private companies will act responsibly. Rules need to be enforced, in a way that matches the scale of public concern, and government should not allow firms room to breathe when they blatantly and flagrantly violate children's right to grow up safely in this country.

Ensuring the safety of children and young people online should be a pre-requisite for access to UK markets and the UK population. For apps and platforms to have access to the UK market, they should have proven child safety features beyond doubt.

This should go alongside clear categorisation for apps and platforms, to help parents understand what's safe and what's not. Whether this comes in the form of film-style ratings, or a Child Safety certificate (CE mark), government must invest in a tool to help children and families quickly understand risks and potential harms.

This should be front and centre on interfaces children and parents are actually using, like app stores, and not buried in guidance that children and families have to actively seek out.

## **3. Take a public health approach.**

Children First are advocating for a public health approach to tackle online harm, to generate a national, consistent set of messages, advice and tools that can help raise awareness of risks and relieve the individual burdens families face as they navigate it alone. It should also involve investment in safe, physical space alternatives to being online where children can freely spend time and play.

This should focus on prevention at a population level, through raising awareness of risks, sharing clear guidance on healthy digital use, and supporting open conversations about what children are doing and seeing. This should go hand in hand with clearer boundaries around access in places like schools.

Technological interventions should be used to their maximum effect, but as it stands restrictions alone would only be a false promise to children and families. It's not possible to 'ban' social media, and the government must be upfront about this. Restrictions may have some deterrent effect, but they will never be able to limit children's access completely.

Over-stating the potential for age-based restrictions could also have negative knock-on consequences. Children may continue to access risky spaces and features, while being less open about it with the adults they trust. Secrecy and shame are tools often used by perpetrators of harm, as children are told not to disclose harm because they will get in trouble. Meanwhile, adults around children may assume that restrictions mean these problems are under control.

Restrictions therefore need to be very carefully handled and must only be used as part of a wider package of measures aiming for long term culture change and delivering urgent support to families across the country. This is why Children First are advocating for a public health approach.

This response has been informed by consultation with children and families across Scotland, through several pieces of participation work that Children First have facilitated in relation to online harm and the digital world, through Children First's local and national services.

In addition, Children First and Young Scot ran a digital survey in April and May 2026, which asked children and young people about their time spent online. 1,059 responses were gathered, and almost two thirds (64%) of respondents said they spend too much or far too much time online.

The survey also asked questions about the things children are sacrificing for this time online. The activities most displaced were screen-free relaxation (44%), sleep (41%), physical activity (34%), and time with family (33%).

## Introduction

**1. Do you want to proceed with this consultation?** Yes

**2. Are you answering as a private individual or on behalf of an organisation?** On behalf of an organisation

**3. If you are responding on behalf of an organisation, please specify:** Children First, Policy Manager

**4. Organisation type:** b. Civil society/third sector/community organisation

**5. If you are responding as a private individual, do you have a parental or caring responsibility for at least one child who will be 21 or younger by the 26th of May of this year (2026)?** N/A

**6. As part of your current occupation, do you work with children aged 21 or younger in an education setting? (for example, as a teacher)** N/A

**7. Where are you located?** a. In the UK

This consultation has five chapters. Please choose the ones you would like to provide answers to based on your time and interest. You will not need to complete every question in these chapters.

## Chapter 1: Understanding how children use technology

### 9. What are the benefits of social media use, and being online, for children?

#### Why Children Experience the Online World Differently

Children's experiences online are fundamentally different from those of the adults around them, even when they are using the same platforms. Understanding this difference helps explain both the benefits and risks. This difference is often under-recognised by policy makers and parents, who understandably project their own experiences of social media onto children's lives.

In reality, children are more vulnerable to the design features of online platforms. Algorithms are built to maximise engagement and can quickly draw children into cycles of compulsive use. Combined with the ways in which some online spaces are exploited by those seeking to harm or manipulate, this means children are more likely to encounter harmful, provocative or extreme content, and to do so more often.

It is also important to recognise that children's online experiences are not uniform. They can vary widely between individuals. This is partly due to the inherently divisive and personalised nature of algorithms, which shape what each child sees. It also reflects differences in the age, stage and circumstances in which children first gain access to devices and online environments.

#### Benefits

Children tell us about benefits with connection, entertainment and learning. Children also recognise that they are growing up in a world that depends on technology, and that it will be a part of their future lives.

- *'We wouldn't be able to survive without technology. Like if it just disappeared, we'd all be like what are we gonna do now. So much of society is built on technology.'* Young person
- *'[It could stop people] accessing the future of the world basically. Everything is online now.'* Young person

#### Connection

The ability to stay connected is particularly valued. Young people described using online platforms to maintain relationships with friends and family, including those living far away. One young person reflected that they could *"talk with family who live in other countries"* and build friendships more easily.

For others, communication online can feel more manageable than face-to-face interaction. A 17-year-old shared, *"I can find conversation over messages easier rather than in real life,"* suggesting that digital spaces can reduce social pressure and support confidence.

- *'It makes people more connected as well. It makes things easier.'* Young person
- *'Good communities and funny animal videos.'* – 17 year old girl
- *'Connecting'*
- *'Connecting and gaming.'*

## Entertainment

Children see and feel the benefits around entertainment, particularly as being online can offer helpful distraction when life gets tough. Children tell us that they often find safety and comfort in their phones and devices.

One young person explained, *“I like to use the internet to laugh at stupid things others upload... I also enjoy seeing other opinions and takes on shows I like.”* Others told us:

- *‘Devices can also be a great way to relax and switch off.’*
- *‘Take[s] my mind off sad things’.*
- *‘Communicating with my friends and listening to music and reading digital books.’* – 15 year old girl
- *‘I enjoy looking at art and my Mum and I share funny videos with each other.’* – 17 year old girl

Young people share with us that the ability to share their lives and feel part of a wider social culture feels positive, and posting updates and engaging with others’ lives was seen as important to belonging. Gaming and online interaction also create opportunities to “hang out” in ways that reflect offline friendships. As one young person put it, *“I like to update what I’m doing [on a ] day to day basis – events and parties.”* Another young person summarised this simply as *“talking to my pals, playing games with my pals.”*

For some, these activities represent important social spaces that can feel as real and meaningful as in-person interactions. This can also be about protecting a personal space, at home or in public, as the distraction of a phone and the physical barrier created by headphones can make children feel like they are in a safe space.

## Learning

It can also make things like learning and helpful information more accessible, opening up opportunities for education that may not have been possible before. Young people described using online platforms to access information, develop skills and support schoolwork.

The Ayrshire Changemakers group highlighted that you can *“watch and learn from videos... [it’s a] space to learn.”* Others spoke about using apps and content to research topics and even replace traditional search tools. One young person noted, *“I use TikTok to research things more than Google,”* illustrating how young people are adapting to new forms of information gathering.

- Families shared how digital technology can provide learning opportunities, with a Grandma reflecting how she was able to learn to sew through an online course which she wouldn’t have been able to access otherwise.
- Young people shared that they are using various platforms to support with their learning, for example, *‘I had to do research for an essay I was writing, and I couldn’t find anything on Google, so I asked Snapchat AI and I got information.’* Young person
- There was also agreement that you can learn from various platforms however, *‘...you can’t always trust it [the information provided].’* Young person

- *‘Watching TikTok videos, talking to my pals, playing games with my pals. I use online to research topics. Using social media in school makes it easier sometimes.’ – 15 year old boy*
- *‘lots of apps to use, get to talk to friends, watch and learn from videos, share pictures with family and friends, connection, promotes adds, space to learn.’ – Ayrshire Changemakers*
- *‘Learning Languages – Duolingo.’ – 11 year old boy*

Listening to children’s voices shows the opportunities and risks they encounter online, reinforcing the need for balanced, rights-based responses. It is essential that government establish a way to continually engage with children, as both their experiences and the policy landscape develop.

## **10. What are the harms or risks of social media use, and being online, for children?**

*“If a child wandered off alone in the real world, everyone would be worried. But a child can wander into an unsafe online space in their bedroom without any supervision. We need to treat online safety with the same seriousness.” – 18 year old young person*

### **The scale of concern**

In 2025, Children First surveyed children and young people between the age of 11 – 25 to explore the things that worry them most. 79% of young people who responded said they are moderately to extremely worried about seeing harmful online content and 78% are anxious about the impact of social media.

While children recognise the benefits of being online, they are equally clear about the serious risks and harms they experience. A consistent theme is that online spaces can feel unsafe, unpredictable and difficult to control, especially where adults exploit these environments. One young person warned that online spaces can be entered by those with harmful intent, explaining that:

*“There are people who deliberately enter spaces meant for young children – gaming platforms, chats, livestreams – and it’s easy for them to hide who they are. Roblox is a good example. They’ve started bringing in age checks and limiting communication, which is a step in the right direction, but it still doesn’t stop everything.” – 18 year old young person*

### **Grooming and exploitation**

The volume of feedback that we received from children who told us about their worries about grooming and exploitation has been shocking.

Young people described platforms as a *“breeding ground”* for harmful behaviour and spoke about *“creeps, older guys talking to young girls... catfishing.”* These risks are compounded by anonymity and the difficulty of verifying identity, meaning young people are not always sure who they are interacting with.

### **Cyberbullying and harmful interactions**

Cyberbullying and harmful interactions are also widespread concerns. Young people described how behaviour online can escalate due to lack of accountability. As one young person explained, *“People can feel bolder behind a screen... Someone can use things against you that you share or post online.”*

Others spoke about “*nasty people that send threats*”, highlighting the emotional impact of online abuse.

### **Impacts on wellbeing**

The cumulative effect of this environment can be damaging to wellbeing. One young person reflected, “*Being online all the time can make you forget what’s happening around you... it can take a toll on how you feel about yourself.*”

Exposure to unrealistic standards and harmful messaging is particularly significant. Young people spoke about the pressure created by influencer culture, noting that it can be “*almost impossible to tell what’s real and what isn’t.*” This can affect confidence, identity and mental health, especially during formative years.

### **Exposure to harmful content**

Exposure to harmful content is another major concern. Young people repeatedly emphasised how easy it is to access inappropriate or dangerous material, with one stating simply that “*it’s available everywhere.*”

They described encountering content related to self-harm, suicide and disordered eating, often unintentionally through algorithms. One young person highlighted that “*TikTok is notoriously bad for exposing young children to this content.*”

### **Normalisation of sexual content**

Young people also raised concerns about sexual content and exploitation. They described receiving unsolicited images and noted that restrictions are easily bypassed, with one explaining “*all they do is ask your age and you can just say you’re 18.*” This exposes children to material that they recognise as harmful and potentially traumatising.

### **Privacy and data risks**

Privacy and data risks further compound these harms. Young people were concerned about how easily personal information can be accessed or shared, including location data. One noted that sharing location “*could put themselves and their family in danger,*” while others highlighted risks of “*data protection... data leaks.*”

### **AI and new tech**

Emerging technologies such as AI introduce new threats. Young people spoke about deepfakes and manipulated images, including experiences where images were altered to appear explicit. One described AI-generated content as “*very invasive*”.

Overall, children’s accounts show that online harm is not occasional but persistent. As one group put it, “*Online harm happens all day, every day more than once.*” Their experiences highlight the scale and normalisation of risk, and the urgent need for stronger protections, education and support to ensure children can benefit from the online world safely.

**11. Do you think the benefits of children using social media, and being online, outweigh the risks, or the other way around?**

- a. Benefits strongly outweigh the risks
- b. Benefits somewhat outweigh the risks
- c. Benefits and risks are roughly equal
- d. Risks somewhat outweigh the benefits
- e. RISKS STRONGLY OUTWEIGH THE BENEFITS**
- f. Don't know / Prefer not to answer

## Chapter 2: Interventions for safer, more positive experiences

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### *Restricting social media services by age*

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**12. Would you support a legal requirement for social media services to have a minimum age of access?**

- a. Yes
- b. No
- c. DON'T KNOW/PREFER NOT TO ANSWER**

**13. To what extent do you agree or disagree with the following statement: "Social media services should have a minimum age of access of at least 16 and should not be accessible to any children under that age"**

- a. Strongly agree
- B. SOMEWHAT AGREE**
- c. Neither agree nor disagree
- d. Somewhat disagree
- e. Strongly disagree
- f. Don't know/ Prefer not to answer

**14. Would you support a legal requirement for social media services to have a minimum age of access lower than 16? If so, at what age would you set it?**

- a. Yes – 13
- b. Yes – 14
- c. Yes – 15
- D. NO – NOT LOWER THAN 16**
- e. Other (please specify)

f. Don't know/ Prefer not to answer

Please explain the reasoning behind your answers about minimum age requirements.

**15. What do you think the impacts would be of having minimum age requirements higher than 13 for social media services?**

*'There are people who deliberately enter spaces meant for young children – gaming platforms, chats, livestreams – and it's easy for them to hide who they are. Roblox is a good example. They've started bringing in age checks and limiting communication, which is a step in the right direction, but it still doesn't stop everything.'* – 18 year old young person

Age checks could have some benefits, by helping set clearer societal expectations about when children should be accessing online spaces. They may reduce the number of children on social media slightly.

However, these measures are inherently limited on their own and risk creating unintended consequences if relied upon as the main solution to online harm. If used as a standalone intervention, Children First believe that minimum age requirements would be counterproductive.

**Minimum age restrictions are inherently limited because:**

1. Age assurance technologies can be easily outwitted. They are already being routinely circumvented by children under the age of 13.
2. VPNs mean that even strong restrictions can be easily sidestepped.
3. Weak age assurance processes being put in place by platforms themselves. Many of these also risk data protection concerns for children's personal and sensitive information.

We are advocating for a more thorough and thoughtful approach to protecting children online, with a package of measures that includes a full-scale public health approach delivered on a par with previous campaigns around smoking and seatbelts. In our view, taking a public health approach would be a much more powerful way to protect children.

Where technology develops and interventions can go further, the potential for this should be carefully and quickly assessed against children's rights standards, then introduced. However, at the moment the technology around minimum age requirements is inherently limited and it is essential that government is upfront about this.

**Additional risks and unintended consequences:**

While intended to protect children, further reliance on minimum age restrictions would have risks and potential for unintended consequences. Children's data may be compromised, or children may be excluded if formal identification is required. They may also inadvertently reduce openness, push children into less safe online spaces and create false reassurance for adults.

1. **The need to maintain open conversations.** Open and honest conversations between children and the adults around them are the best way to keep children safe. If children are 'banned' from spaces, this risks shutting down those conversations. Children are likely to continue accessing restricted spaces, while being less transparent about this. Talking about what children are doing

online – where they are spending time, who they are speaking to and what they are seeing – is often the best way to intervene and guard against harmful interactions or exposures.

2. **Risks of driving children to riskier spaces.** As others such as NSPCC and the Molly Rose Foundation have also highlighted, minimum age requirements for a selection of platforms may also drive children to less visible and more risky spaces. We know that digital addictions and peer pressure make it incredibly difficult for children to stop going online, and it's highly likely children will continue to access social media in some way.
3. **'Quick fixes' may create a false sense of safety.** Minimum age restrictions, presented as a 'ban', also risk encouraging parents and carers to switch off from the problem. It's understandable why so many are looking and hoping for a technical fix to the harms children face online, but expecting that minimum age restrictions will protect children is a dangerous assumption.

**On this basis, Children First believe that minimum age restrictions could have some benefits, but only if they are introduced in a very careful and considered way. They should not be relied upon alone and instead should be considered a small part of a much wider package of measures.**

### **Age and stage appropriateness**

Through Children First's work with children and young people, we have noticed that there is a difference in opinions between children who are just beginning to spend time online, and children who have been online for a number of years.

Children First have been discussing the related question of when children should get access to a digital device. Answers to this question vary, but there is a link between the age of the child who is answering and their response.

When asked about the right age for device ownership, 64% of young people who we spoke to through one survey pointed to the transition to secondary school. It is significant that this recommendation comes directly from children and young adults themselves, drawing entirely on their own recent experiences of growing up in a digital environment.

Our analysis shows that the older the respondent, the later they say children should get a device. By the time respondents reach 19 or older, their median recommendation for device access shifts to 14-15, demonstrating that with age and hindsight, young people strongly favour delayed access to technology. These survey findings match the feedback we get from children.

### **Additional measures that should be considered alongside minimum age restrictions**

Any further investment in minimum age restrictions should be delivered as part of a broader package of measures to keep children safe online. This should combine clear standards for platforms, better information for families and a preventative public health approach, recognising that safety is shaped by design, regulation and the behaviours of both children and the adults around them. Other actions that could feature in this package of measures should include:

### **Clear guidance on access to devices, particularly for toddlers and babies:**

Access to and ownership of devices is the precursor to access to social media. Addictions will begin as soon as children gain access to devices, and for babies and toddlers there can be physical consequences for their brain and eye development. Beyond the question of access to social media, there is another question about safe access to digital devices overall.

We note Ofcom's recent research that a significant proportion of children have access to a mobile phone from their infancy.<sup>3</sup> It's understandable why allowing access to devices has become normalised. However, this has happened without enough public understanding of the impact, particularly around brain development and developing addictions.

Government should develop a much clearer, firmer, and evidence informed guide for parents that is made available as part of their routine pre- and post- natal healthcare package. Deterring access for as long as possible should be the goal.

**Child safety certification:** a child safety warning to help children and carers understand whether platforms are designed to be safe for children.

We would encourage the government to implement a UK version of what has been recommended by Ireland's Online Health Taskforce.

This would establish an independently verified and easily identifiable sign available alongside apps and platforms to confirm whether they are safe for children to use. As set out in the Taskforce's report, "This approach creates competitive advantages for comprehensive children and young people's rights implementation whilst ensuring all digital products and services move beyond narrow safety measures to embrace children and young people's full spectrum of digital rights."

These certifications could also reflect age and stage appropriateness in a way that's far more flexible than a blanket restriction.

If this were to be introduced alongside some age-based restrictions for apps and platforms that are blatantly dangerous for children – for example, sites that promote pornographic content or that frequently allow hateful and violent content to be circulated – this would help maintain a fuller, more accurate understanding of what's safe for children online.

**A public health campaign,** communicating the need-to-know information for parents and carers to be able to navigate the complicated decision-making processes in an age and stage appropriate way. This should include advice and guidance on screen time, an awareness of the risks

We need governments to do the work to understand what safe access looks like and deliver that to families everywhere. Our aim should be for a country-wide culture shift that means future generations do not suffer the same exposure children growing up now are going through.

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<sup>3</sup> [Children's Online experiences research report](#), P8, Figure 1.

This should focus on preventing harm, and not just responding to it, while being guided by evidence as it emerges. It should also involve the whole system and support the whole population, by addressing the underlying causes of risk and online harm.

This should also recognise that the adults around children are also part of the solution. Children are heavily influenced by the adults around them. The digital addictions we worry about in children are just as prevalent in the adult population. Adults role modelling a healthier online/offline balance would be hugely influential in supporting children's own use and access.

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### ***Age of digital consent***

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#### **16. At what age do you think the age of digital consent in the UK should be set for information society services?**

- a. 13
- b. 14
- c. 15
- d. 16**
- e. Other (please specify)
- f. Don't know / Prefer not to answer

#### **17. What risks or burdens may be associated with raising the minimum age of digital consent? For example, ensuring parental consent, costs to industry, access to services, volume of requests, etc.**

As with other interventions that rely on age assurance, any higher threshold is meaningless without reliable ways to verify a user's age.

Approaches must be risk-based and privacy-preserving. Requiring intrusive identity checks for all services could create new data protection risks and deter use, while weak systems encourage children to bypass controls.

Parental involvement is also important but should not be over-relied upon. While parental consent mechanisms are widely used, they can be ineffective where parents lack digital awareness or where children do not have supportive guardians. Policies should support parents with clear tools and information but ensure platforms retain responsibility for protecting younger users.

Not all digital services pose the same level of risk, and a one-size-fits-all age threshold may be disproportionate. Stronger requirements could be applied to high-risk services, while an argument could be made that lower-risk and beneficial services, such as educational platforms, with transparent privacy practices, could be treated more flexibly.

## **18. What should be considered to make raising the digital age of consent effective and workable?**

*For example, suitable approaches to verify users' ages (including where parental consent is required) or suitable approaches to verify a parent or carer's identity, age and relationship to the child.*

Raising the digital age of consent can strengthen children's protection online, but it will only be effective and workable if it is supported by practical, proportionate, and well-enforced measures.

First, there must be a clear policy objective. Raising the age should not be symbolic; it should aim to reduce risks such as excessive data collection, profiling, and exposure to harmful or manipulative content. This clarity helps shape proportionate rules and avoids inconsistent implementation across platforms.

Platform design obligations are critical, because raising the age of consent alone does little if services continue to use harmful design practices that exploit personal data for commercial purposes. Data protection and privacy by default, adherence to the ICO's children's code and limits on user profiling are needed to make protections meaningful in practice.

We note that the ICO have made some significant interventions to enforce privacy requirements, and effective enforcement of any rules introduced are going to be critical to protect children's personal information online. Regulators must have sufficient powers and resources, and expectations on organisations must be clear. Without credible enforcement, compliance will be inconsistent, and children will not be protected sufficiently.

Any changes must keep children safe while still allowing them to learn, connect and take part online. When considering raising the digital age of consent we should consider the digital literacy of both children and parents as there is undoubtedly a need for better information sharing, awareness raising and education around the issue of children's data protection. Awareness and understanding around digital age of consent is currently very low, and there is an appetite for more amongst many children, parents and carers.

Overall, raising the digital age of consent can be effective, but only as part of a broader, balanced framework combining legal, technical, and educational measures.

### **What can we learn from the new EU verification app?**

An EU-style age-verification app would be a useful step in the right direction for the UK, but it is not a complete solution to protecting children online. Its main strength lies in providing a privacy-preserving, standardised system that allows users to prove their age without sharing personal data with the online provider. This could address current UK concerns about fragmented approaches and excessive data collection by private providers.

Adopting a similar model would likely improve consistency, user trust, and compliance. A single, interoperable tool would reduce friction for users and remove the "excuse" that age verification is too complex for platforms to implement effectively. It would also align with data minimisation principles, which are central to good information governance.

However, age verification alone has clear limitations. It can still be circumvented through tools like VPNs or account sharing, meaning determined users may still bypass restrictions.

Poor implementation of this type of support would be an obvious concern. There is also the consideration that although personal data would not be shared with the online providers and developers, that data would be shared with the UK Government and the provider of the app. Furthermore, passports might be the only consistent identification proof that could be used to prove someone's age which heightens the need for secure and transparent processing of personal data.

**19. To what extent do you agree or disagree with the following statement: "There is a case for changing the digital age of consent for some online services but not others"**

- a. Strongly agree
- B. SOMEWHAT AGREE**
- c. Neither agree nor disagree
- d. Somewhat disagree
- e. Strongly disagree
- f. Don't know/ Prefer not to answer Please explain the reasoning behind your answer.

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***Restricting services based on 'risky' functionalities***

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**20. Some online services allow their users to engage with the following functionalities. Do you think these functionalities should be age restricted so children below a certain age cannot engage with them? (Please select all that apply)**

- A. LIVE STREAMING**
- B. ABILITY TO SEND NUDE IMAGES OR VIDEOS**
- C. DISAPPEARING CONTENT**
- D. LOCATION SHARING**
- E. CONNECTING OR TALKING TO STRANGERS**
- f. None of the above
- g. Other (please specify)
- h. Don't know/ Prefer not to answer

**21. Based on your previous answers, please specify your preferred minimum age for each of the functionalities below:**

- a. Live streaming
- b. Ability to send nude images or videos
- c. Disappearing content
- d. Location sharing
- e. Connecting or talking to strangers
- f. None of the above

**G. OTHER (PLEASE SPECIFY)**

On the basis that we are recommending a form of child safety certification that considers the individual safety of apps and platforms, we have chosen not to respond to this question.

**22. To what extent do you agree or disagree with the following statement: “Restricting children’s access to these features/ functionalities, would provide for a safer online experience for children”.**

Features/functionality include live streaming, the ability to send nude images or videos, disappearing content, location sharing and connecting or talking to strangers.

**A. STRONGLY AGREE**

- b. Somewhat agree
- c. Neither agree nor disagree
- d. Somewhat disagree
- e. Strongly disagree
- f. Don’t know/ Prefer not to answer

**23. What do you think the impacts would be if some online services were required to introduce age restrictions on specific features and functionalities?**

*For example, impacts on the safety and wellbeing of children, or the impact for parents and carers, as well as other users. You could also comment on the impact on all users' privacy and data or on business costs, revenue, and innovation.*

Our view on minimum age restrictions for specific features and functionalities is aligned with our response to the question in relation to social media. Restrictions are not a foolproof intervention and should not be relied upon alone.

However, identifying risky features could be a good way to help government assess whether platforms are safe for children. This could support the idea of bringing in a form of child safety certification.

We would also reiterate that it's not just children who need protected from addictive design features. While children are particularly vulnerable to many of these features, adults around them are also addicted to devices.

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***'Addiction', compulsive design and displacement***

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**24. The following design features are sometimes known as 'persuasive', meaning they may encourage children to stay online for longer. From the following list, please select the ones you think are particularly 'persuasive' to children: (Please select all that apply).**

**A. INFINITE SCROLLING**

**B. AUTOPLAY**

**C. AFFIRMATION FEATURES (E.G. 'LIKES', COMMENTS)**

**D. ALERTS AND PUSH NOTIFICATIONS**

**E. CONTENT RECOMMENDATION ALGORITHMS (THESE ARE ALGORITHMS WHICH PROVIDE PERSONALISED RECOMMENDATIONS ON A USER'S FEED)**

f. None of the above

g. Don't know/Prefer not to answer

h. Other (please specify)

**25. Which of these features do you think should be age restricted? (Please select all that apply)**

**A. INFINITE SCROLLING**

**B. AUTOPLAY**

**C. AFFIRMATION FEATURES (E.G. LIKES, COMMENTS)**

**D. ALERTS AND PUSH NOTIFICATIONS**

**E. CONTENT RECOMMENDATION ALGORITHMS (THESE ARE ALGORITHMS WHICH PROVIDE PERSONALISED RECOMMENDATIONS ON A USER'S FEED)**

- f. None of the above – they should not be age restricted
- g. Don't know / Prefer not to answer
- h. Other (please specify)

**26. Based on your previous answers, please specify your preferred minimum age for each of the features below.**

- a. Infinite scrolling
- b. Autoplay
- c. Affirmation features (e.g. likes, comments)
- d. Alerts and push notifications
- e. Content recommendation algorithms (these are algorithms which provide personalised recommendations on a user's feed)
- f. None of the above – they should not be age restricted

**G. OTHER (PLEASE SPECIFY)**

On the basis that we are recommending a form of child safety certification that considers the individual safety of apps and platforms, we have chosen not to respond to this question.

**27. Would you support the following restrictions for children's access to online services? (Please select one)**

- a. Daily screen time limits for individual apps
- b. Restricting overnight access for individual apps

**C. BOTH – DAILY SCREEN TIME LIMITS AND OVERNIGHT ACCESS FOR INDIVIDUAL APPS**

- d. I would not support any of them
- e. Don't know/ Prefer not to answer

**28. What do you think the impacts would be if online platforms were required to restrict specific features or functionalities, or to introduce time limits?**

*For example, impacts on the safety and wellbeing of children, or the impact for parents and carers, as well as other users. You could also comment on the impact on all users' privacy and data or on business costs, revenue, and innovation.*

Restricting specific features or functionalities, or introducing time limits, could have some positive impacts for children's safety and wellbeing. Limiting access to high-risk features such as live-streaming or direct messaging with strangers, or persuasive design elements could reduce children's exposure to harm. Time limits may also help some families to establish clearer boundaries around device use and support healthier routines, including sleep.

Screentime is an area of debate amongst young people, with some sharing that up to 7 hours a day is suitable and others feeling less time on screens is preferable. One young person (14) shared that she has spent up to 16 hours a day on her device.

One young person (12 years old) reflected that, *'2 hours [of screen time] but this is not realistic. It's bad for people's brains.'* Another young person (11 years old) felt that there should be more limits for under tens, then go up gradually in stages until 13-14 years old. We heard similar suggestions from other young people, with one young person (17 years old) mapping out the following time limits for screentime:

- *'1-3 years old: none  
3-6 years old: 1-2 hrs  
6-8 years old: 2-3 hrs including schoolwork  
8-13 years old: talk with child to find a compromise'*

However, as with other age-based interventions, time-limits would not be sufficient on their own and may have a range of unintended consequences if relied upon too heavily.

There is also a risk that restrictions could undermine openness between children and the adults around them. If children perceive controls as strict or punitive, they may be less likely to speak openly about their online experiences or the harms they encounter. This is particularly concerning given that trusted relationships and open conversations are one of the most effective ways to identify and respond to risk.

Introducing time limits and feature restrictions may also place a significant burden on parents and carers, who are often expected to implement and manage these controls. Without clear, consistent and accessible tools, this can create conflict within families and place responsibility on individuals rather than on platforms that design and profit from these environments.

More broadly, focusing on restricting individual features risks overlooking the systemic nature of online harm. Many of the risks children face are driven by platform design, including algorithms, persuasive features and commercial incentives that encourage engagement. Restricting selected features does not address these underlying drivers and may give a false sense of safety.

For these reasons, Children First believe that restrictions on features or time limits should only be introduced as part of a wider, balanced package of measures. This should include:

- stronger regulation and accountability for platform design and safety
- clear and accessible tools, such as child safety certification, to help families understand what is safe

- investment in digital literacy for children, parents and carers
- and a public health approach that supports healthier relationships with technology, reduces reliance on screens, and promotes safe, trusted connections offline

Taken together, these measures would be more effective in supporting children to benefit from the online world while being protected from harm, rather than relying on restrictions that can be easily bypassed or that shift risk elsewhere.

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***Which services should age restrictions apply to***

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**29. What factors are important when determining which apps, sites or services to apply minimum age of access restrictions to?**

*For example, user-to-user interaction, the ability to post material, persuasive design features, risky functionalities, ability to generate non-text mediums such as video or images, the target age group, the size of the service.*

**Ability to interact with strangers and unknown users**

Children consistently identified contact with unknown adults as one of their most serious concerns. They described platforms as spaces where it is easy for adults to “hide who they are” and enter environments designed for children, including gaming platforms, chats and livestreams. Services that enable direct messaging, “quick add” features or communication with strangers therefore present a higher level of risk and should be prioritised.

**Exposure to harmful and recommended content**

Young people told us that harmful content is “available everywhere” and often appears without being actively sought, particularly through algorithm-driven feeds. Platforms where content is pushed to children, rather than chosen by them, should be carefully assessed.

This includes the extent to which algorithms amplify content related to self-harm, eating disorders, sexual content or abuse, which young people described as appearing regularly in their feeds. Where harmful interactions are frequent or seen as part of the normal online experience, this should be a key indicator of risk. This includes environments where anonymity reduces accountability and where harmful behaviours escalate quickly.

**Design features that enable or increase risk**

Young people highlighted specific features that elevate risk, including:

- location sharing, which could “*put themselves and their family in danger*”
- easy connection tools that allow strangers to contact them
- image sharing and editing tools, including those linked to AI, that enable manipulation or exploitation

The presence of these features, particularly where safeguards are weak, should be a central consideration.

### **Data access and privacy risks**

Young people raised concerns about how easily personal information can be accessed or shared online, including location data, images and other personal details. They described risks such as data leaks, doxxing and misuse of content. Services that involve extensive data collection, sharing or visibility of personal information should therefore be considered higher risk.

### **Evidence from children's actual use of platforms**

Decisions should be informed by where children are actually spending their time, not just by how platforms are categorised. Young people identified TikTok, Snapchat, Instagram and gaming platforms such as Roblox as key environments where both connection and harm take place. Gaming platforms are often overlooked in policy discussions despite being spaces where children experience significant risks.

### **Age, stage and supervised vs unsupervised use**

Children themselves described a clear distinction between access to devices and access to online services, with many supporting a gradual, supervised introduction that reflects age and maturity.

## **30. Are there any types of apps, sites or services that you would want to be captured by minimum age of access restrictions?**

As well as platforms that fit into the categories noted in response to Question 29, our main concern is about gaming platforms and sites, where children spend a huge amount of their time online.

We are concerned by how these platforms appear to be under the radar in the current online harm conversation, while we receive constant feedback about extreme and harmful exposures and interactions.

We are particularly concerned about platforms that deliberately pitch themselves to be 'for children', like Roblox. One young person told us:

*'There are people who deliberately enter spaces meant for young children – gaming platforms, chats, livestreams – and it's easy for them to hide who they are. Roblox is a good example. They've started bringing in age checks and limiting communication, which is a step in the right direction, but it still doesn't stop everything.'* – 18 year old young person

Messaging platforms are also a risk, particularly given how many apps are beginning to embed messaging options even when the primary purpose is something else. For example, while Spotify is generally used to listen to music, podcasts and audiobooks and would be safe for many children it now includes a messaging function which could leave children using the platform vulnerable.

Other messaging platforms noted in our consultations with children and young people included WiZ, which was described to us as "like Tinder for children", and a place where girls have to 'put up with' lots of sexually explicit messages, and people sending pick up lines or harassing girls with unwelcome conversations.

## **31. What factors are important when determining which apps, sites or services to apply age-restrictions on specific features and functionalities?**

*For example, user-to-user interaction, the ability to post material, persuasive design features, risky functionalities, ability to generate non-text mediums such as video or images, the target age group, the size of the service.*

See response to Question 29.

**32. Are there any types of apps, sites or services that you want to be captured by age-restrictions to features/ functionalities?**

See response to Question 30.

**33. Some services are already exempt from the Online Safety Act. Examples include internal business services, services with limited functionalities and services provided by persons providing education or childcare. Are there additional types of service which you think would be appropriate to exempt from age restrictions?**

*These might include services whose primary purpose is delivery of educational content, services that offer specific child or teen accounts or versions, or services which offer parental controls.*

No.

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***Artificial intelligence (AI) chatbots***

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**34. What are the benefits to children of using AI chatbots?** For example, this might include as a search function, for educational purposes, for creativity.

AI can offer some practical benefits for children, particularly in learning and accessing information. However, the risks are significant and currently outweigh these benefits.

Throughout Children First's engagement with children and their families about online harm, it has been apparent that there was a lot of anxiety around what AI is and what it is beginning to produce.

Children, young people and parents and carers shared that they are worried at how fast it is developing, and that it has no proper monitoring and regulations attached, so anyone can currently use AI. Young people told us:

- *'Don't use it as it's not regulated.'*
- *'It is dumb.'*
- *'It's for lonely people.'*
- *'People are cheating on their essays. Teachers are reminding us all not to use it.'*
- *'The whole thing is sketchy.'*
- *'People are stealing other people's art – this shouldn't be allowed.'*

- *'I think it's a lot more dangerous than it is good - until there's proper regulations, although there probably won't be enough regulations ever.'*

Parents and carers felt they didn't know as much about it,

- *'We old'uns are just not gonnae take it in.'* Grandma
- *'I thought it was robots. I have to be honest I thought it was robots. That is so so scary.'* Mum

Some of the young people could see the benefits of AI as they have used it to help with school and college support, but equally felt that they would be better off without it.

- *'As good as AI can be for helping with essays and things like that, I think we would be better off without it.'* Young person
- *'I don't love it too much [AI]... I don't really agree with how people are using it but I have been using Gemini for helping with my essays or asking questions. That's quite helpful. But there's been stuff recently with video and picture AI and it's been used for quite dodgy reasons.'* Young person

Young people agreed that AI is creating content and images that are invasive and explicit which feels worrying.

- *'There's already so much AI generated stuff being dodgy like very explicit sexual content of minors and celebrities. It's very invasive.'* Young person
- *'It [AI] can be dangerous... I think they are called deep fakes or something.'* Young person
- *'There's been a bit of a phenomenon recently on Facebook where it's like really obviously AI generated images, but older people are falling for it and commenting and giving it engagement and stuff. And then recently it's like self-cannibalising itself so basically AI learns stuff on the internet so there's so much AI generated stuff online, so AI is learning from other AI generated things that are incorrect or dodgy. So, it's creating these really random things. I just don't know where it's leading.'* Young person

The young people felt that although it can be helpful, the dangers outweigh the benefits. With some sharing that you can't trust people and accounts online anymore, *'You just don't know if your online friends are real or not.'* Young person.

The general consensus was to avoid using AI until there are more regulations in place and becomes safer. *'Avoid using AI as an organisation until there's more regulations.'* Young person

Young people also shared that AI and Chatbots can be hugely risky, with 'Grok' – X (formally known as Twitter) being the most prevalent for producing harmful content. One young person shared her thoughts on AI, telling us to *'BAN – deep fakes, risk for children... it also allows for fake information'*.

Another young person recalled that one of her peers edited a girl's picture, which looked like a 'nude' but was 'a pic of fake boobs' which was generated through AI. One young person shared that she feels AI is creating content and images that are invasive and explicit which feels worrying. She said *'There's*

*already so much AI generated stuff being dodgy like very explicit sexual content of minors and celebrities. It's very invasive.'*

### **Risks and regulations**

The challenge is, AI is already part of the furniture in many online experiences. It's not something that can be easily defined or quickly extracted from online platforms.

While there are some practical benefits, and many children are already using these tools as an accessible and speedy source of support or information, we are concerned as to why this section asks about the benefits, when much more discussion needs to be had about the risks.

Children First are carefully considering our own use of AI potential in our own services. Our own position is that we will not introduce AI functionalities without careful consideration of the way in which this might impact the children and families we support and their rights.

Our priority, at all times, is the maintenance of children's rights under the United Nations Convention on the Rights of the Child. We would strongly support the development of ethical AI principles, grounded in these rights, to be developed at a national level.

### **Relationship replicas**

We are aware of some AI Chatbot functionalities that mimic a real-life trusting relationship, generating for example, a virtual mum or dad. We are also aware of features in some of these platforms that don't just interact with children when they go into the apps. AI platforms initiate texts and calls that interrupt children who are not online. These features present some of the most egregious threats to children's wellbeing, safety, and their opportunity to develop trusting in person relationships.

It's undoubtedly clear though that any demand for these types of services derives from a much more significant problem, which is the lack of safe trusting and reliable relationships between children and their families and communities. There will be a direct relationship between the extent to which online illusory relationships are depended on, and the availability of the opportunity for those trusting relationships in children's own personal networks. Children need safe places, spaces and activities they can freely take part in offline, to develop these personal networks.

Through our national Support Line service, where we receive calls from children and parents, we know that AI is being increasingly used to find answers when support services feel distant and hard to reach.

### **Misinformation and data protection**

There are also clear risks around misinformation, data protection and manipulation. AI systems can generate inaccurate or misleading content, and children may not always have the critical skills needed to assess this.

At the same time, the way in which these systems process and store personal data introduces further risks to children's right to privacy. This undermines children's rights under the UNCRC, and their right to privacy under Article 16 and their right to access information under Article 17.

Government must urgently establish plans for a national rollout of children’s critical digital literacy. We would support the approach recommended by Ireland’s Online Health Taskforce, which said this should “focus on the promotion of health and wellbeing, ensuring online safety and protecting children and young people’s rights. The campaign and educational programme should aim to support not only children and young people, but also those who have caring responsibilities for them, including parents, carers, teachers, youth workers and relevant health professionals.”

This report also recommended that “The Irish government should prohibit technology companies from partnering with schools on the development of any educational resources unless they have been licensed by the government to do so. For this purpose, a strict set of protocols is required to ensure that children’s privacy and data are safeguarded and that they are not exposed via educational technology to advertising, ‘persuasive design’ or harmful content.”

We would support both these recommendations and refer the government to the evidence produced by the Irish Online Health Taskforce in considering this.

**35. Which AI chatbot features are most risky for children?** (Please select all that apply)

- A. THE REALISM OF INTERACTIONS, INCLUDING REALISM OF CONTENT GENERATED**
- B. THE PERSONALISATION OF INTERACTIONS**
- C. HOW THEY MIMIC RELATIONSHIPS (FRIENDSHIP)**
- D. HOW THEY MIMIC RELATIONSHIPS (ROMANTIC)**
- E. HOW THEY MIMIC EMPATHY**
- F. FLATTERING LANGUAGE**
- G. FEATURES TO ENCOURAGE MORE QUESTIONS/ REQUESTS (E.G. ASKING QUESTIONS BACK)**
- H. THE ABILITY TO RECALL INTERACTIONS ACROSS SESSIONS**
- I. J. THE TYPE OF CONTENT GENERATED – A) VIDEO, B) TEXT, C) AUDIO, D) IMAGE ALLOWING CHILDREN TO HAVE ACCOUNTS**
- K. HALLUCINATION OR FALSE, MISLEADING RESPONSES**
- L. ABILITY TO ENGAGE IN AND GENERATE MATURE CONTENT (E.G. SEXUAL / ROMANTIC ROLEPLAY)**
- m. Other (please specify)
- n. None of the above/AI chatbot features are not risky for children
- o. Don’t know/ Prefer not to answer

**36. Which functionalities of AI chatbots should minimum age restrictions apply to?**

Restricting children's access to AI chatbots suffers the same challenge we noted in response to Question 15, in relation to minimum age restrictions for social media.

Restrictions alone will not stop children accessing these platforms and should not be presented as a 'quick fix' to these risks. In addition, government must deliver a package of protections covering all risky AI functionalities. These should not just be limited to a subsection of functionalities.

AI chatbots are now deeply embedded in app design and website functionality. These are not just features that exist on peripheral, dedicated apps or sites. AI is widely available as a resource that's accessible to children using mainstream sites, without any real safeguards. This means children are often interacting with AI systems without necessarily understanding when they are doing so, or how those systems are influencing the information they receive.

Age-based restrictions cannot act as a safeguard alone. A much more thorough package of measures is needed from government to protect children from the clear harms that AI present. To help children and parents navigate what's safe and what's not, we support ideas to embed some form of categorisation within apps and platforms.

Whether this comes in the form of film-style ratings, or a Child Safety (CE mark), government must invest in a tool to help children and families quickly decipher what's safe and what's not. This should be front and centre on interfaces children and parents are actually using, like app stores, and not buried in guidance that children and families have to actively seek out.

We would also reiterate our call on government to take forward any measures as part of a wider public health approach, that seeks to address the underlying causes of these harms. This needs to involve the whole system supporting the whole population with clear messaging about the risk children face and offering practical tools that will guide children and families towards safer, healthier and more balanced use.

### **37. Should AI chatbots have minimum age restrictions?**

#### **A. YES – MINIMUM AGE REQUIREMENTS FOR AI CHATBOTS**

- b. Yes – restrict access to certain features and functionalities
- c. Yes – both minimum age requirements and restricting access to certain features and functionalities
- d. No
- e. Don't know/ Prefer not to answer

Please explain the reasoning behind your answer

### **38. What do you think the impact would be of introducing age restrictions on AI chatbots or certain features and functions?**

*For example, impacts on the safety and wellbeing of children, or the impact for parents and carers, as well as other users. You could also comment on the impact on all users' privacy and data or on business costs, revenue, and innovation.*

See response to Question 36.

## Chapter 3: Effective compliance and enforcement of online safety rules

### Age assurance

**39. To what extent do you agree with this statement: “Adults should complete age checks more often, if it means children are safer online”?**

**A. STRONGLY AGREE**

- b. Somewhat agree
- c. Neither agree nor disagree
- d. Somewhat disagree
- e. Strongly disagree
- f. Don't know/ Prefer not to answer

**40. What should be considered to make minimum age restrictions effective and workable?**

*This could mean either age restrictions for access to whole services, or for specific risky or 'addictive' features or functionalities.*

See responses to Question 18.

Minimum age restrictions alone will not be enough and must be part of a much wider package of measures underpinning a full-scale public health approach to tackling online harm and protecting children online.

This should involve the development new tools to help children and parents understand what's safe and what's not, such as watermarks, age-based certifications or child safety designations that are attached to apps or platforms.

Restrictions must also go alongside a large-scale awareness raising and information sharing campaign, that delivers information about the risks and harms children face. This must be delivered in an empathetic, non-judgemental way that helps parents role model a healthy digital balance as well.

**41. What do you think the impacts might be from requiring age assurance across a greater number of online platforms?**

*For example, impacts on the safety and wellbeing of children, or the impact for parents and carers, as well as other users. You could also comment on the impact on all users' privacy and data or on business costs, revenue, and innovation.*

See the response in Question 15, 18, 30 and Question 40.

**42. How, if at all, could age assurance be made more effective?**

See the response in Question 15, 18, 30 and Question 40.

**43. What should be considered when assessing the effectiveness of age verification and age-assurance technologies?**

See the response in Question 15, 18, 30 and Question 40.

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***Circumvention of age limits***

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**44. What methods to circumvent online safety rules do you think children in the UK use, beyond Virtual Private Networks (VPNs), or similar technologies?**

VPNs are undoubtedly the main challenge to enforcing age-based restrictions. However, we are aware of a number of other ways in which children take simple, creative steps to avoid restrictions.

These include using a different email address, using AI images or pictures of someone else, making themselves look older. Fake birthdays are also often used, and sites that require children to 'confirm' their age without any other checks are obviously weak and worthless interventions.

It's notable that already, with minimum age restrictions for under 13s in place on many sites, children often avoid restrictions with parent or carer knowledge and awareness. Many parents tell us that they support this because otherwise, children would take the same steps without telling them and so on balance it's safer for them to do it openly.

This is an important reflection for the government to consider, as one of the most significant risks we see in the further introduction of age-based restrictions is its potential to shut down conversations between children and parents.

It should also be noted that some apps and platforms can be pivoted to become social media equivalents, even when that's not their primary function. For example, we are aware of children using Google Docs as a messaging platform in schools, or the messaging function within Spotify.

The government must think much more broadly about the way in which children experience harms online. There is a spectrum of harmfulness, with some sites that are currently open to children being much riskier than others. But this shouldn't mean that other platforms are assumed to be safe.

The best way to mitigate this is by making sure that the trusted adults around children are having a constant, informed conversation with children about what they're doing online and what they're

experiencing. That's why Children First are recommending a public health approach, to support evidence-informed awareness raising and information sharing.

**45. Which of the options below do you think the government should prioritise to reduce circumvention of online safety rules in the UK? (Select the most important to you)**

- a. More education for children
- b. Restricting children's access to VPNs
- c. None of the above

**D. OTHER (PLEASE SPECIFY)**

A public health approach to tackle online harm at a population level.

- e. Don't know/ Prefer not to answer

**46. To what extent do you agree or disagree with the following statement: "Everyone should go through age checks to access a VPN if it would prevent children using them"**

**A. STRONGLY AGREE**

- b. Somewhat agree
- c. Neither agree nor disagree
- d. Somewhat disagree
- e. Strongly disagree
- f. Don't know/ Prefer not to answer

**47. What do you think the impacts would be if VPNs were age-restricted?**

*For example, impacts on the safety and wellbeing of children, or the impact for parents and carers, as well as other users. You could also comment on the impact on all users' privacy and data or on business costs, revenue, and innovation.*

We understand why age-restrictions for VPNs might be considered, but on balance think that the effect would be limited and may lead people to use providers who are less trustworthy, where data protection and device protections are under fewer safeguards.

This is because ultimately, age restrictions for VPNs would face the same barriers as age restrictions for any other sites – unless the whole world were to get onto the same page, to make sure every VPN provider in every country built in the same restrictions to their service.

**48. What should be considered to make age-restricting VPNs effective and workable?**

*For example, public trust and engagement with increased age assurance requirements, accessibility of age assurance methods and variations of age assurance approaches across services, interaction with legitimate uses of VPNs.*

As set out in previous answers, Children First believe that the government must take action to protect children through a strong package of measures, rather than on the basis that restrictions alone can prevent harm. Children First would continue to advocate for any regulations to be introduced as part of a wider public health campaign.

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### ***Mobile phones in schools***

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**49. To what extent do you agree or disagree with the following statement: “To address some of the challenges schools face with mobile phones, the Department for Education’s (DfE) non-statutory guidance on ‘mobile phones in schools’ should be made statutory.”**

*This would mean schools have a legal duty to follow the guidance, which explains to individual schools and trusts how to implement a policy that prohibits the use of mobile phones throughout the school day, unless they have good reasons not to. This includes during lessons, the time between lessons, breaktimes and lunchtime.*

**A. STRONGLY AGREE**

b. Somewhat agree

c. Neither agree nor disagree

d. Somewhat disagree

e. Strongly disagree

f. Don’t know/prefer not to answer

**50. What impacts would there be if this guidance was made statutory and why?**

*For example, on disruption in lessons, bullying or harassment, parental views on mobile phone policies, staff, etc.*

A clear national message often supports consistency in implementation. Part of the rationale behind the legislation introduced in Australia was about government carrying the weight in making this decision. Prime Minister Anthony Albanese said “I want parents to be able to say, ‘sorry mate, it’s against the law for me to get you to do this’. We don’t argue that the changes that we will be legislating will fix everything immediately. We have laws such as people can’t buy alcohol if they’re under 18, and from time to time that can be broken. But those laws set what the parameters are...”

There is a clear and obvious case to support schools enforce some boundaries to benefit children's learning. We know that boundary setting around access to devices can be a source of immense conflict between children and the adults around them, so introducing national legislation, with devolved equivalents, has a similar logic. Instead of asking individual schools and teachers to navigate this question themselves, if statutory guidance were to be introduced this would remove individual level conflicts around the question of whether children should or shouldn't be using devices in schools.

Children have shared with us that for many children there is an important difference between restrictions in class, and restrictions in the school overall. Some children share with us that they have 'safety plans' in place, which support their security.

- *"100% they should not be used in class, but they can be a big comfort to even have in your bag, especially anxious children."* – 13 year old girl
- *"Yes I think we should [have phones in school]. I don't think we should need to be on them in class but I wouldn't want my phone taken off me because what if something was to happen or you need to send an important message. For me I needed my phone as part of my safety plan. I think it's our phone so should be our choice."* – 17 year old girl

It is important to understand children's concerns about this, while recognising that these experiences must be viewed in the context of the active addictions affecting many children and adults today.

We need to ensure that their best relationship is with the people around them, and not their device. This means more investment in safe, trusting relationships around children so they have supportive adults to turn to. Strong connections with teachers and others can help children feel safer, reduce anxiety and rely less on their phones.

School environments have changed drastically in the last decade, and we are deeply concerned with the way in which digital addictions are showing up in younger and younger age groups. We would therefore support the introduction of clear statutory guidance, for all UK nations at all levels, with appropriate exemptions when this is right for children's safety and best interests.

**However, school-based restrictions on access to devices will not protect children from digital harms completely.**

We know that the addictive pull devices have mean that children find it hard to put devices away, just as many adults struggle. The evidence shows that children and adults are experiencing digital addictions.

It should therefore be anticipated that children will experience a form of withdrawal when they are asked to put devices they are addicted to away. Already, in schools where they are piloting this intervention we are aware of 'burner phones' being used, as children feel they can't be without it.

Again, this is why Children First are advocating for the government to think more broadly by taking a public health approach to encourage healthier boundaries around online access in and outside of school.

We are also aware that digital devices are already relied on for classroom and home learning. Investments have been made in an attempt to make the most of technology, in a challenging financial environment. Disinvesting may have financial consequences for schools.

This should act as a warning for government, who should be doing the work to anticipate where risks around technology exist and ensuring that public sector investments are not made without properly assessing the potential risks children may face.

Our recommendation would be to embed a children's rights impact assessment within any public sector technological investments, building on the model being used in Scotland following the introduction of the UNCRC (Incorporation) (Scotland) Act 2024.

**51. Are there specific circumstances where you think children should be permitted to have or use a mobile phone during the school day? (Please select all that apply)**

- a. Medical needs
- b. Special Educational Needs and Disabilities (SEND) requirements
- c. Individual safeguarding concerns
- d. Caring responsibilities
- e. Educational or learning purposes
- f. Travel to and from school
- g. None of the above, children should not be permitted to have or use a mobile phone during the school day at all
- h. None of the above, children should always be permitted to have or use a mobile phone during the school day
- i. Don't know/ Prefer not to answer

**J. OTHER (PLEASE SPECIFY)**

Rather than prescribing a list of circumstances, a best interests test should be applied, in line with children's rights under the UNCRC.

## Chapter 3: Preparing children for a digital future and enriching their online experiences

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### *Media and digital literacy*

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**52. Which areas of media or digital literacy do children and families most need additional help with?** (Please select all that apply)

- A. MANAGING SCREEN TIME AND ONLINE HABITS
- B. SPOTTING ADVERTS, SPONSORED POSTS OR AI GENERATED CONTENT
- C. KEEPING PERSONAL INFORMATION PRIVATE
- D. ONLINE BEHAVIOUR AND EXPERIENCES (BULLYING, RESPECT, COMPARISON OR PEER PRESSURE)
- E. CHECKING IF INFORMATION IS TRUE
- F. UNDERSTANDING HOW SOCIAL MEDIA WORKS (FOR EXAMPLE, 'LIKES' OR ALGORITHMS)
- G. STAYING SAFE ONLINE (INCLUDING HOW TO HAVE CONVERSATIONS ABOUT ONLINE SAFETY)
- H. REPORTING HARMFUL OR UPSETTING CONTENT
- I. KNOWING WHICH APPS OR SITES ARE RIGHT FOR THEIR AGE
- j. None of the above
- k. Don't know/ Prefer not to answer
- l. Other (please specify)

**53. If you are responding as a private individual, where do you go for help with online safety or media literacy skills?**

Not applicable.

**54. Where, if anywhere, would you like to see more support available in the future?**

This could include places you already use but don't offer support and you would like them to, or places that could offer more support with help from government or others. (Please select all that apply)

- A. SCHOOLS OR CHILDCARE SETTINGS
- B. COMMUNITY OR YOUTH SPACES (FOR EXAMPLE LIBRARIES, YOUTH CLUBS OR LOCAL CHARITIES)

**C. PARENT OR CARER GROUPS OR NETWORKS**

**D. PUBLIC SERVICES (SUCH AS FAMILY HUBS, GP SURGERIES OR COMMUNITY CENTRES)**

**E. FAITH OR CULTURAL GROUPS**

**F. NON-GOVERNMENTAL ONLINE SOURCES (SUCH AS WEBSITES, PLATFORMS OR ONLINE COMMUNITIES)**

**G. GOVERNMENT WEBSITES**

h. None of the above/I would not use these to find help

i. Don't know/ Prefer not to answer

j. Other (please specify)

**55. Outside of schools, how could the UK government better support children and young people to stay safe and feel supported online? (Please select all that apply)**

**A. BY PROVIDING CLEAR GUIDANCE THAT CHILDREN CAN USE ON THEIR OWN**

**B. BY SUPPORTING PARENTS AND CARERS TO SUPPORT CHILDREN ONLINE**

**C. BY WORKING WITH ONLINE PLATFORMS AND SERVICES THAT CHILDREN ALREADY USE**

**D. BY SUPPORTING YOUTH ORGANISATIONS AND COMMUNITY GROUPS TO HELP CHILDREN ONLINE**

**E. BY MAKING HELP OR ADVICE EASY TO ACCESS WHEN SOMETHING GOES WRONG ONLINE**

**F. BY INVOLVING CHILDREN AND YOUNG PEOPLE IN DESIGNING SUPPORT**

g. None of the above

h. Don't know/ Prefer not to answer

**56. What types of support would help children with additional needs stay safe online and build digital skills? By 'additional needs', we mean children who may need extra support for a range of reasons (such as learning, communication, health or access needs). (Please select all that apply)**

**A. CLEAR, SIMPLE INFORMATION USING PLAIN LANGUAGE**

**B. CONTENT ADAPTED FOR DIFFERENT AGES, ABILITIES OR NEEDS**

**C. VISUAL, AUDIO OR INTERACTIVE FORMATS**

**D. SUPPORT DELIVERED THROUGH TRUSTED LOCAL OR COMMUNITY SERVICES**

**E. FLEXIBLE OR ON-DEMAND SUPPORT THAT CAN BE ACCESSED WHEN NEEDED**

**F. SUPPORT THAT HELPS PARENTS OR CARERS GUIDE CHILDREN ONLINE**

g. None of the above

h. Don't know/ Prefer not to answer

i. Other (please specify)

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***Promoting high quality content***

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**57. Who would you trust to determine what is meant by 'high quality' online content' for children 13-16? (Please select all that apply)**

**A. GOVERNMENT**

b. Online platform trust and safety teams

c. Parents, carers or trusted adults

d. Children

e. Developmental experts

f. Educators

g. Youth workers

h. Child advocacy charities and organisations

i. None of the above

j. Don't know/ Prefer not to answer

k. Other (please specify)

**58. What further action should be prioritised to support positive online spaces for young people? (Please select all that apply)**

**A. DEVELOP BEST PRACTICE PRINCIPLES FOR INDUSTRY**

**B. DEVELOP GUIDANCE FOR PARENTS AND CARERS**

**C. DEVELOP GUIDANCE FOR CHILDREN**

**D. REVIEWING INTERNATIONAL APPROACHES**

e. Industry voluntarily promoting high quality content for children

f. None of the above

g. Don't know/ Prefer not to answer

h. Other (please specify)

**59. What should be considered when taking further action to support positive online spaces and content for young people?**

*For example, how would this work in practice for services, taking into account existing best practice across industry, and who should feed into future guidance.*

As already discussed, tech firms must be held to account with a much firmer line. They must be required to demonstrate that their products are safe by design, limiting exposure to harmful content, restricting high-risk features such as contact with strangers, and addressing persuasive design that drives excessive use.

Clear, visible tools such as child safety certification or age-appropriate ratings should help children and families quickly understand what is safe.

Restricting platforms' access to the UK market must not be a faraway threat – it must be an option that is actively used.

As also discussed, digital literacy and consistent messaging about healthy online behaviours should be cornerstones of a public health approach. Supporting children to critically understand content, algorithms and online relationships is key, alongside equipping parents and carers with clear, accessible guidance. Open, trusting conversations between children and the adults in their lives remain one of the most effective safeguards against online harm.

Positive online spaces must be considered alongside children's wider lives. Investment in safe, engaging offline opportunities and community spaces is essential to reduce over-reliance on digital environments and support wellbeing.

## Chapter 5: Supporting families

### *Parental controls*

**60. To what extent do you agree or disagree with the following statement: “Parents should have control over the online experiences of their children”**

a. Strongly agree

**B. SOMEWHAT AGREE**

c. Neither agree nor disagree

d. Somewhat disagree

e. Strongly disagree

f. Don't know/ Prefer not to answer

Please explain the reasoning behind your answer.

**61. How should this level of control change for children of different ages? For example, a 16-year-old and an 11-year-old.**

See response to Question 15.

Parental control should not be understood as a fixed set of restrictions, but as a relational and evolving support that reflects a child's age, stage, experiences and wider needs.

It should sit alongside the conversations parents and carers are having with children on a constant basis, which in turn should be supported by clear messaging delivered by a government led public health approach to tackling online harm.

Just as parents are equipped with information about how to support healthy behaviours in children's diets and access to physical exercise, parents should have clear guidance about what healthy digital access looks like in family environments.

Parental controls should not replace direct supervision, particularly for younger children or where there care and protection needs. In practice, this should include:

- Active parental involvement and supervision of online activity, including agreed access to devices and platforms
- Stronger parental controls and safety settings, particularly around high-risk features such as messaging, location sharing and interaction with strangers

- Clear boundaries on access and use, including time limits and restrictions on the most harmful or adult-oriented platforms
- Regular, supportive check-ins about what the child is seeing and experiencing online

As children become more independent, this should transition to shared decision making, while making sure that there are still regular open and honest conversations, and continued monitoring of high-risk features and behaviours.

Parents and carers should also ask curious questions about children's online activity when they see changes in their behaviours or attitudes. Often, we find online sources as a root cause of worries, stresses or frustrations children share in their offline lives.

## **62. What would help parents and carers to more effectively use parental controls?**

*For example, more information on how to do this on purchase of a phone, help from platforms on how to set up, or greater standardisation across tools.*

Parental controls cannot carry responsibility alone. They must sit within a wider system including safer platform design, clear information for families, and a public health approach to online harm.

Government should develop a standard recommended parental control tool, alongside a form of child safety certification that sets age assurance in the context of clear information about platforms that are deemed to be safe, and those that are riskier.

The government should also note the risks highlighted in the United Nations Committee on the Rights of the Child General Comment Number 25 (2021), on children's rights in relation to the digital environment which says that:

*“The digital environment presents particular problems for parents and caregivers in respecting children's right to privacy. Technologies that monitor online activities for safety purposes, such as tracking devices and services, if not implemented carefully, may prevent a child from accessing a helpline or searching for sensitive information.*

*“States parties should advise children, parents and caregivers and the public on the importance of the child's right to privacy and on how their own practices may threaten that right. They should also be advised about the practices through which they can respect and protect children's privacy in relation to the digital environment, while keeping them safe. Parents' and caregivers' monitoring of a child's digital activity should be proportionate and in accordance with the child's evolving capacities.”*

Children deserve to grow up safe, supported and able to enjoy the benefits of the online world without harm. This will not be achieved through restrictions alone. It requires urgent, coordinated action across government, industry and communities, grounded in children's rights and informed by their lived experience.

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