



Consultation response

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## **Growing up in the online world: a national consultation**

May 2026

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### Children in Scotland response

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#### **About Children in Scotland**

Children in Scotland is a welcoming and dynamic charity that amplifies the voices, views and experiences of our members and children, families and professionals across Scotland. We achieve this through direct services, meaningful participation, policy work, inspiring communications and sector-leading events and learning opportunities.

We are a vibrant and inclusive community of dedicated individuals and organisations who use our skills and passion to bring evidence-based and fresh thinking together, with one shared aim of giving all children in Scotland an equal chance to flourish.

We are stronger together in driving lasting impact for Scotland's children.

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#### **Our response**

Children in Scotland provides many inclusive, engaging and meaningful participation opportunities for children and young people to share their views on issues they care about and impact them. Across many strands of our work, the topic of social media and young people being online has been raised by children, young people and staff who work directly with them.

Our response to this consultation makes use of the depth of our evidence and we would like to extend our thanks to the following groups for their insightful contributions to our response:

- Members of our children and young people's advisory group, Changing our World
- Organisations in our membership who contributed through our Member's Forum event

We have also included greatly-valued input from members of the Suicide Prevention Youth Advisory Group and primary and secondary school pupils in Glasgow and Fife who brought up and discussed in this topic in sessions for our Connecting Scotland Digital Inclusion project.

Whilst we welcome an in-depth review and targeted action to protect children and young people online, we do not believe that a ban for under 16s will sufficiently address this. We want to highlight both the risks and benefits to being online and highlight why many children and young people make use of social media (lack of choice, few or non-existent options to access support or create connections in person) and that this issue is wider than social media itself. We are calling for tech companies to be compelled to make being online safer for children and young people, such as ensuring current minimum age limits are enforced, harmful content is tackled effectively and that features that are designed to keep users hooked are removed.

Digital challenges and inclusion are greatly important topics for the children's sector and our organisation is determined to work collaboratively and proactively with the sector to explore these issues in depth. More information about our work the "Digital Conversation" can be found [here](#).

We welcome the opportunity to contribute to the steps the UK Government will take to make being online safer for children and young people. We urge the Department for Science, Innovation and Technology to fully and demonstrably prioritise the views of children and young people. Children and young people are experts in their own lived experiences, and their perspectives must be meaningfully included in decision-making processes.

## **Chapter 1: Understanding how children use technology**

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

Many of the children and young people we work with have told us of the benefits of being online. We have heard how it can offer opportunities for accessing friendship and community through connecting with friends. We have also heard that it provides young people opportunities to learn about new things and different people's life experiences that they would otherwise not have the chance to learn about. One young person who grew up in a rural part of Scotland that is predominately white told us,

*"As a young person, I learnt about race issues...being online can help you learn things outside of your current bubble".*

This benefit was also highlighted by secondary school pupils that participated in our Digital Inclusion project, who told us that for young people social media is a way of finding out what is going on in the world, and in other places, and that young people get the news through social media. Research

carried out by the Electoral Commission found that social media is the most common place that young people encounter political information.<sup>1</sup>

In the current context of the difficulties young people in Scotland experience in accessing timely and effective mental health support due to increasing waiting lists and a lack of available services,<sup>2</sup> young people have shared with us how being online can be an accessible, and sometimes crucial, way for them to access peer support. Members of the Suicide Prevention Youth Advisory Group shared how vital online support can be. One member told us:

*"I am still friends with people I met online as a teenager. I would have killed myself if I wasn't online...I had a group chat where I could share what I was feeling more easily than to people in-person"* (Member of the Suicide Prevention Youth Advisory Group).

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

In our response (to question 9), we highlighted how the opportunities to connect with others is a benefit of social media use. There are concerns that many social media apps used by young people, such as Instagram and Facebook, are no longer as social in design as they once were. As pointed out by the Institute for Public Policy Research, social media companies describe themselves as social and connective, but they are driven by algorithmic personalisation, which shifts users such as young people away from shared social experiences. Between 2025 and 2026, there is a noted transition from users seeing and interacting with "who you know" to "what you can be sold".<sup>3</sup>

We also highlighted in our answer to Question 9) that social media and being online provide young people with opportunities to receive support from peers, however social media should not be easiest way for young people to access the support they need. The provision of accessible support is the role and responsibility of governments and services and when examining why young people are spending more time online, the UK Government must

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<sup>1</sup> Electoral Commission, "Young people's views on politics and voting (2026)", accessed here: <https://www.electoralcommission.org.uk/research-reports-and-data/young-peoples-views-politics-and-voting-2026>

<sup>2</sup> Child and Adolescent Mental Health Services (CAMHS) waiting times (3<sup>rd</sup> March 2026), accessed here: <https://publichealthscotland.scot/publications/child-and-adolescent-mental-health-services-camhs-waiting-times/child-and-adolescent-mental-health-services-camhs-waiting-times-quarter-ending-december-2025/>

<sup>3</sup> Institute for Public Policy Research, *Stuck on you: how to make social media good again* (April 2026), accessed here: [Stuck on you](#)

consider what actions it is doing to ensure young people are provided with accessible and beneficial in-person opportunities.

Young people are accessing information online about politics, news and current affairs. However, many young people we have engaged with are concerned about the content they encounter online and the proliferation of both mis- and disinformation. In research carried out this year by the Electoral Commission, they found that nearly half of young people say that they see fake political information at least once a week and most express concern about misinformation.<sup>4</sup> We have heard from young people that they believe that many young people rely upon social media for information due to the lack of accessible information available to young people elsewhere. We have also heard from members of Changing our World on how children and young people can be exposed to harmful content (such as material depicting violence), which can in turn impact their mental health, and that they are concerned about how spending time online can impact young people's wellbeing.

One member said:

*"Personally, I am not allowed on any social media. My friends are and they have been different since they have been on it".*

The amount of time young people spend online is also a cause for concern for young people and practitioners we have engaged with. In our response to Chapter 2, we will elaborate further on how many social media apps have been designed to keep users (including young people) engaged with them for as long as possible, and how we think this should be addressed.

We do not think it is helpful to frame this solely as a question of whether the benefits of social media outweigh the risks for children and young people. There is a great deal more nuance to this issue as differences in screentime, activities, experiences, platforms used and the content that is consumed are all factors to consider. It is clear that being online has been more embedded into children's lives and there are risks involved. One young person summarised this as:

*"It [social media] is important but I also worry about safety".* (Member of Changing our World)

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<sup>4</sup> Electoral Commission, "Young people's views on politics and voting 2026, accessed here: <https://www.electoralcommission.org.uk/research-reports-and-data/young-peoples-views-politics-and-voting-2026>

If we are concerned about the impact this has, we must examine how this can be made safer in practice, and why this has come about.

When considering the experiences of young people growing up in the online world, it must be recognised that young people are being given fewer opportunities to socialise or learn offline. There is a growing gap in in-person activity and support due to funding constraints.<sup>5</sup> With fewer accessible public spaces, reduced youth services, and rising costs for social activities, the internet often becomes the only convenient and affordable place for young people to connect, relax, and entertain themselves. Young people also tell us that schools now rely far more on digital resources, a shift accelerated by the Covid pandemic. For some, being online has become the only practical way to access information on what is available to them. One young person described how a university society they belong to shares all meeting details exclusively through social media, leaving no offline alternative.

Research is emerging from Australia, after the Australian Parliament passed legislation prohibiting those under the age of 16 from using social media. Substantial proportions of 12–15 year-olds who used restricted platforms prior to the ban coming into force report that they are using messaging apps (39%) and gaming platforms (43%) more since restrictions were introduced. This shows that young people still have a strong need to stay connected and will seek out other online methods to facilitate this.<sup>6</sup>

A member of Changing our World shared experiences of social media amongst their peers:

*“Lots of people (or at least at my school) use social media to fit in and ensure they are included in conversations about social media, and know what people are talking about”.*

If we are serious about reducing the time children and young people spend online, we must offer them viable and accessible activities to spend time and connect with others offline through the sustainable funding of youth groups, projects and services.<sup>7</sup>

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<sup>5</sup> YoungScot, Cost is the biggest barrier to young people taking part in hobbies (29<sup>th</sup> January 2026), accessed here: <https://youngscot.net/ysobservatory/cost-is-the-biggest-barrier-to-young-people-taking-part-in-hobbies>

<sup>6</sup> Molly Rose Foundation, Australia's Social Media Ban: Is it Working? [Molly Rose Foundation Briefing](#) accessed 19<sup>th</sup> May 2026

<sup>7</sup> C Redlich et al, *Debate: Social media in children and young people – time for a ban? Beyond bans: addressing the digital determinants of youth mental health and well-being in the European region* Child and Adolescent Mental Health (14<sup>th</sup> September 2025)

In the words of another young person who spoke to us about this topic, “The answer isn’t ‘online is bad’, it is ‘teenagers need help’”.

**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**

### **Restricting social media services by age**

There is no current legal requirement for social media services to have a minimum age of access, though many services set their minimum age policy at 13. A minimum age of access for a social media service would equate to a ban for anyone younger than the minimum age.

**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.**

E - specify for age-graded approach

Targeted intervention to support online wellbeing is a welcome and vital action to protect children and young people from harm. Our position is that while social media and online platforms should be restricted by age, we do not believe that this should necessarily equate to a blanket ban for under 16s. There was strong agreement from our members that such an approach risks oversimplifying discussion, generalising young people's diverse experiences and environments, and risks complacency from regulatory and social media bodies by attempting to remove young people from platforms, rather than changing the landscape. Instead, we would favour an age-graded approach that prioritises safety by design, removes addictive features, and gradually introduces higher-risk functionalities to support young people to use social media safely. Our rationale for this is explained below.

Young people were generally in agreement regarding the requirement for a minimum age of access to social media. Suggested minimum ages ranged from 10 to 18, with 13-16 emerging as the most common. Young people emphatically underlined the potential harms of social media, noting dangerous design features, unwanted or inappropriate content, and cyberbullying. They stressed the importance of education in conjunction with restricted access, noting that social media use should not exist without proper education around its harms and safe use. We have expanded more on digital literacy and education in Chapter 4.

*“Make it so no one under 16 can access social media. Once you can get it, if you want to get something specific, make sure that’s what you get, nothing random. Kids should get taught about it before they start using it”*

*(Member of Changing our World)*

*“Restrict age for social for 16 and under as well as helping kids understand how harmful social media can be and it can make you a bit distracted, understanding how kids feel about social so you know what to change about it” (Member of Changing our World)*

*"I think there should 100% be a minimum age for people to use social media. I think that age should be at least 15 in my opinion as that's an age when people can be hopefully trusted to use it sensibly and there should be an age because of all the horrible people on the Internet that do horrible things" (Member of Changing our World)*

*"16 [as a minimum age of access] would be good, but better to have a limit on everything -[the] feature itself is the issue. Then it wouldn't be a problem" (Member of Changing our World)*

During engagement, young people described an age-graded approach as a positive model, with several individuals referencing Roblox as an example. This involves using age-based tiers with different restrictions and functionalities, for example limitations on text and voice chat functions, specific games and content. It was noted that this staged approach would provide a framework for young people to engage with the positive aspects of social media, while placing the responsibility of enforcement on social media and tech companies, rather than parents or young people themselves. This would also allow for gradual, responsible introduction to social media use.

Overall, a social media ban for under 16s does not sufficiently tackle the issues it is trying to address. A blanket ban risks not taking action to make platforms safer, giving parents and adults a false sense of security. It is important not to create a dichotomy between a blanket social media ban and unregulated access for under 16s. As such, Children in Scotland's position proposes regulated access for children and young people evolving with capacity and age, and greater responsibility for safer design from platforms. We would support allowing limited, age-based access with stronger protections for younger users, and phased exposure to social media and higher-risk features, which allow young people to participate in the benefits while being protected from the harms. We would highlight research and policy analysis from the

World Health Organisation<sup>8</sup> and 5Rights Foundation<sup>9</sup> who present in depth discussion on building safer digital environments and propose a 'Safety by Design' code of practice.<sup>10</sup>

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

A blanket social media ban for under 16s may have a disproportionate impact on young people.<sup>11</sup> Our members stressed the importance of social media for young people living away from family members and friends, with a particular concern for care experienced young people, for whom social media may be the only link back to their community. This may be of heightened importance for young people under 16, who already have fewer freedoms than their older peers. Enforcement may also fall to parents, which may disproportionately influence the harms that young people experience, depending on parent/carer digital literacy, as well as their ability and motivation to engage in healthy and appropriate supervision.

There are significant concerns over the realistic implementation, enforcement, and compliance of tech companies with a ban for under 16s. Although many

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World Health Organisation, Addressing the digital determinants of youth mental health and well-being: policy brief (2025), accessed here: [Addressing the digital determinants of youth mental health and well-being: policy brief](#)

<sup>9</sup> 5Rights Foundation, New polling finds the public want platforms proven safe before use – not just banned (May 2026), accessed here:

New polling finds the public want platforms proven safe before use - not just banned

<sup>10</sup> 5Rights Foundation, Safety by Design Code of Practice, (May 2026), accessed here: Safety by Design Code of Practice

<sup>11</sup> 5Rights Foundation, Building a digital environment designed with children in mind: An international best practices blueprint (March 2026), accessed here: [5RIGHTS\\_BROCHURE.pdf](#)

social media companies set the minimum age to 13, in 2025 Ofcom reported that 55% of young people in the UK aged 3-12 used at least one social media app<sup>12</sup>. Having engaged with young people across multiple projects, we know that young people under the age of 13 are already able to access social media, something that has recently been outlined in findings by the European Commission<sup>13</sup>. Young people have expressed their concerns directly, noting the perceived likelihood of their peers circumventing a ban.

*“They will find a way around it [the ban], then they just won't tell adults”*

*“If something is bad, it doesn't stop them doing it, it stops them from owning up to it”* (Members of the Suicide Prevention Youth Advisory Group)

Emerging research<sup>14</sup> from Australia highlights the ineffectiveness of the ban, reporting that 61% of young people surveyed continue to access social media. It is notable that most young people still accessing social media had no need to circumvent the ban as platforms had failed to detect their accounts. Imposing a ban, rather than addressing the structural issues of social media risks, may cause further harm to those under 16, especially if they may consequently access more unregulated, or adult online spaces, and be less likely to engage transparently with adults around their use. Further research<sup>15</sup> highlights issues around enforcement in an Australian context, citing social behaviour and enforcement as reasons for low compliance. This is not simply a children and young people issue, and approaching it as such, instead of addressing the design and features of social media itself, risks cutting off the benefits for under 16s as outlined in question 9 and failing to enact positive

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<sup>12</sup> Ofcom, Children and parents: media use and attitude report 2025, (May 2025), accessed here: [Children and parents: media use and attitudes report 2025](#)

<sup>13</sup> European Commission, Commission preliminarily finds Meta in breach of Digital Services Act (April 2026), accessed here: [Commission preliminarily finds Meta in breach of Digital Services Act](#)

<sup>14</sup> Australia's Social Media Ban: Is it Working? [Molly Rose Foundation Briefing](#) accessed 19<sup>th</sup> May 2026

<sup>15</sup> Why Bans Fail: Tipping Points and Australia's Social Media Ban [BFI WP 2026-57.pdf](#) Accessed 19<sup>th</sup> May 2026

change. Concerns were raised by our members that strict bans could increase harm by reducing digital inclusion, making young people less likely to seek help, and creating difficulties in education, employment, and social integration.

Banning access to social media for those under 16 does nothing to educate young people about online safety and may make providing this support more challenging for parents and carers, as 16 coincides with greater independence in other aspects of their lives. Our members also described a tension between rights and freedoms at different ages, for example noting a contradiction between the legal capability to work at 14, and the ability to access social media at 16. There was strong agreement through our membership that responsibility should be on companies, and not children and young people.

### **Age of digital consent**

**Under UK GDPR, ‘information society services’ often need to seek consent to use people’s data for activities such as profiling for advertising purposes. Information society services are most online services that are provided for commercial purposes, including websites, apps, online gaming, social media, search engines, online marketplaces, etc. Children can only give their consent for their data to be used for such purposes if they are 13 or above. For children under this age, services are required to make reasonable efforts to verify consent from those with parental responsibility.**

**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**

Digital consent is a complex and nuanced issue without a straightforward answer. While we have not reached a conclusion on the age of digital consent, we have presented more discussion in Question 19 and would highlight the policy priorities outlined by the World Health Organisation:<sup>16</sup>

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<sup>16</sup> World Health Organisation, Addressing the digital determinants of young people's mental health and well-being (May 2025), accessed here: [Addressing the digital determinants of](#)

strengthening data privacy protections for children, and limiting the collection and processing of young people's data for targeted advertising and manipulative purposes.

We are aware that social media companies are for-profit entities, and believe more safety and protection must be afforded to children. There is a strong case for protecting children's data privacy and stopping companies from intentionally, or unintentionally, using young people's data for monetary gain, irrespective of the potential harm. As discussed in Question 28, we agree with the NSPCC position<sup>17</sup> that the scope of the Online Safety Act must be expanded so that tech companies are required to prevent the direct and indirect harm caused by the use of dark design patterns<sup>18</sup> such as autoplay, infinite scroll and persistent notifications. This should include restrictions on processing children's data for manipulative purposes and personalisation that encourages children to engage with social media for longer periods of time. However, as outlined earlier, it is vital that young people still have access to information and services, especially around education, news, health and wellbeing, and support groups. We support restrictions on companies processing data for manipulative purposes, but ensuring that young people under 16 can still access services is crucial. Emphasis should be on restricting social media and tech companies' access to young people's data.

**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.**

Raising the age of digital consent may offer children some protection from their data being used for profiling and advertising, and being encouraged to spend more time online. It may also require more parental/carer involvement in a young person's online life and encourage communication and children's views to be taken into account.<sup>19,20</sup> This is likely to impact young people differently due to diverse home and family lives.

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[young people's mental health and well-being: web annex: findings from an evidence review and policy mapping](#)

<sup>17</sup> [NSPCC](#)

Institute for Public Policy Research, *Stuck on you: how to make social media good again* (April 2026), accessed here: [Stuck on you](#)

<sup>19</sup> Internet Matters, *Children's Wellbeing in a Digital World*, (April 2026), accessed here: [Children's Wellbeing in a Digital World Index Report 2026](#)

<sup>20</sup> 5Rights Foundation, *Building a digital environment designed with children in mind: An international best practices blueprint* (March 2026), accessed here: [5RIGHTS BROCHURE.pdf](#)

A concerning issue of raising the age of digital consent is what may be blocked for children and young people. In our work, young people have raised concern over important information that has been blocked following implementation of the Online Safety Act. Worryingly, this includes LGBTQ+ sites, sites with sex education, and resources about puberty.

*“Lots of things being blocked, some of those things could be helping young people”* (Member of Suicide Prevention Youth Advisory Group)

Young people underlined the importance of access to these online spaces:

*“Space to be myself, if I didn’t have that space I wouldn’t be as far as I am today”* (Member of Suicide Prevention Youth Advisory Group).

Children in Scotland members described how some young people, for example girls, benefit from access to health and wellbeing resources that may not be available or discussed in their offline or family environments. It is vital that young people under 16 are able to access services, information and support groups (for example around identity, disability, mental health information and support networks), without parental consent. Failing to do so may have a disproportionate impact on already marginalised young people. No young person should be further marginalised due to lack of accessible information and connection.

**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.**

There are age verification concerns, similar to those we have outlined in Question 14. For example, young people have raised issues around AI facial recognition, the ability to circumvent age restrictions, and the risk that poorly-implemented regulation could exacerbate inequalities and have disproportionate impacts on young people without formal ID, children experiencing poverty, and families who are unable or unwilling to support them. Our members identified significant risk around data security, inconsistent enforcement, retention of verification images, data privacy concerns, and

trust in providers. Concerns were also raised around long-term consequences of digital footprints, identity fraud, responsibility and accountability if young people bypass bans, and privacy and surveillance risks linked to age assurance. Issues around robust age verification have been widely reported on.<sup>21</sup><sup>22</sup>

Young people have presented varying opinions on parental involvement in social media use, and this should be considered in discussion. For example, we have heard from young people that linking under 16s social media accounts to parents' accounts could be a useful measure. They outlined that in addition to helping parents manage safe social media use, it could also be used as a way for young people to demonstrate to their parents that they are using it responsibly (for example if linked accounts could see how much time was spent on different apps). Some young people who had tighter restrictions imposed by parents felt that this would help them demonstrate to their parents that they were able to self-regulate their social media use. Alongside this, young people still wanted to retain their privacy and expressed that apps that give parents too much access, for example to the content of messages or who they are from, shouldn't exist.

5Rights presents further discussion on parental controls, noting issues with relying on this as a primary safeguard and cautioning against an overreliance on this in protecting young people.<sup>23</sup> Again, this emphasises the importance of regulation of social media companies and data privacy for young people. Although parents may have in-depth knowledge of their children to make judgements on when they are ready to access different social media features, we cannot assume parents to have more knowledge and ability to understand

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<sup>21</sup> Information Commissioner's Office, Open letter issued to tech firms to strengthen age checks and protect children's data (March 2026), accessed here:

[Open letter issued to tech firms to strengthen age checks and protect children's data | ICO](#)

<sup>22</sup> The Independent, Some children are drawing on fake moustaches to bypass online age checks (May 2026), accessed here: [Some children are drawing on fake moustaches to bypass online age checks, report finds | The Independent](#)

<sup>23</sup> 5Rights Foundation, Building a digital environment designed with children in mind: An international best practices blueprint (March 2026), accessed here: [5RIGHTS BROCHURE.pdf](#)

the terms and conditions of data consent than young people. We have heard of young people under 13 having free and unsupervised access to online content with no parental controls. This may be due to parental understanding or priorities, or issues around devices being shared between adults and children.

We would also consider how raising the digital age of consent impacts a child's right to erasure, especially if content of them has been posted online by someone else (e.g. parents, schools, clubs etc).

**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.**

Children in Scotland has conducted in-depth work with young people around data consent.<sup>24</sup> Sessions gave young people a chance to explore how data is collected, used, and kept safe, while thinking carefully about privacy and responsibility. Young people considered real-world risks to data and who should be responsible for keeping it secure. Young people emphasised the importance of consent, choice, and sensitivity, noting that they should be informed, supported, and able to opt out if they want. Findings from the project showed that most young people do not trust companies with their data, and that uncertainty exists about how companies use the data they share. Young people also noted the inaccessibility of lengthy and technical language in relation to data processing:

*“Too long, should be a summary version to promote people to read it”*

(Participant in Data Research with Children and Young People Project in partnership with Scottish Centre for Administrative and Research Data)

*“Half of us can't be bothered [reading terms and conditions]”*

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<sup>24</sup> Children in Scotland, Young people, data and research project (May 2026), accessed here: [Young people, data and research project | Projects | Children in Scotland](#)

(Participant in Data Research with Children and Young People Project in partnership with Scottish Centre for Administrative and Research Data)

*“There is a risk that researchers might not use child friendly language, so it's important to use terminology that participants can understand”*

(Participant in Data Research with Children and Young People Project in partnership with Scottish Centre for Administrative and Research Data)

5Rights Foundation has published an International Best Practices Blueprint with a section addressing data privacy and consent.<sup>25</sup> We highlight the regulatory principles outlined in the document and calls to embed privacy, security and safety in design.

The range of knowledge and awareness that exists regardless of age is notable. While some young people in S1 – 3 (age 12-15) reported that they were unsure how companies use their data, others as young as P5 (age 9-10) expressed awareness of social media companies' financial profit from their engagement with the platforms. Our members highlighted the need for decisive action on algorithmic design, and monetisation models that promote compulsive use.

The interaction between data consent and the addictive nature of social media is crucial in protecting children from harm as data around behaviour patterns is used to encourage children to stay online for longer. A recent report published by the Institute for Public Policy Research<sup>26</sup> draws comparison between the UK's Online Safety Act and the EU's Digital Services Act, noting that the latter focusses on banning manipulative “*dark patterns*” that prioritise commercial interest and may compel young people to consent to data sharing and processing that they do not fully understand the implications of.

Ofcom<sup>27</sup> reports that children may be particularly vulnerable to such design strategies that influence behaviour, therefore driving them to spend more

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5Rights Foundation, Building a digital environment designed with children in mind: An international best practices blueprint (March 2026), accessed here: [5RIGHTS\\_BROCHURE.pdf](#)

<sup>26</sup> Institute for Public Policy Research, Stuck on you: how to make social media good again (April 2026), accessed here: [Stuck on you](#)

<sup>27</sup> Ofcom, Children's Register of Risks (April 2025), accessed here: [Children's Register of Risks](#)

time online and potentially engage in harmful content or addictive loops, aligning directly with what we have heard from young people about lack of clarity and transparency in data consent, and compulsive design of social media. Addictive features have been a key concern from both members and young people throughout our work. We have responded in more detail in Question 24.

Our members raised concerns around young people's data consent, which included data exploitation, targeted advertising without informed consent, radicalisation, fake news, grooming, sextortion, bullying, and the long-term consequences of digital footprints and identity fraud.

Raising the age of digital consent may involve more input from parents and families in children and young people's online lives. This may have both positive and negative consequences as discussed in Question 17. Education is important for children, adults and families: raising awareness of how companies are using their data to inform their algorithms, personalise marketing and keep them on the app. Young people and the adults supporting them should be made aware of how their information is being used, the dangers and wider implications of consenting to this. Young people have told us that those who collect their data have a duty to protect it. While there is no perfect system, it is essential that more is done to legislate against deceptive, manipulative, and exploitative business models that collect and use young people's data in a way that causes harm. Our members highlighted precedence for regulation around profile, and the advertising of harmful and addictive substances to young people, for example tobacco and vapes, gambling, and alcohol. In Europe, there is precedent of acting against social media companies in line with protection from harm. The Institute for Public Policy Research<sup>28</sup> reported that the European Commission imposed fines on X around deception of users and found TikTok's features to breach the Digital Safety Act for failing to properly risk assess the harm or addictiveness of features such as infinite scroll, autoplay, and recommender systems. The UK government must consider the current approach to online safety and what more it can do to protect children and young people without cutting access to the benefits the services provide. This may involve changes to digital consent, data processing and privacy, and a different approach across some for-profit services such as social media, and access to online information and services such as helplines.

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<sup>28</sup> Institute for Public Policy Research, *Stuck on you: how to make social media good again* (April 2026), accessed here: [Stuck on you](#)

A comprehensive review would determine legislation changes and powers to stop companies from using children's data to make them stay online longer, for marketing or personalisation. There is a particular need for change on how data is used for recommender systems and the impact this has on addictive patterns.

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

**'Functionality' refers to a feature of a service which enables interactions or actions between its users. This includes a range of capabilities that services offer.**

**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**

All of the above.

**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)**

We support the approach called for by the NSPCC, in which young people's social media use includes phased exposure to these functionalities. We agree that this would help to prevent cliff edges of protection where children move from no exposure, to high-risk functionalities, to full access.<sup>29</sup> Please refer to the response submitted by the NSPCC in full for further detail.

**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**

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<sup>29</sup> [NSPCC](#)

*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

Strongly agree.

**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.**

N/A

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

**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)

A – E.

**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)

A-E

**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)**

Other.

We agree with the input of the NSPCC that all persuasive design features listed in the consultation (A-E) increase screentime and require regulation. However, this list overlooks other key forms of persuasive design, some of which have clear and worrying links with child harm. For example, streaks can incentivise children to continue prolonged social media use further, exacerbating the impact this might have on their wellbeing.<sup>30</sup>

A member of Changing our World told us that:

*“Lots of people would be wanting to use social media to keep up streaks with friends and seeing what their friends have posted and see what everyone else has posted and posted things themselves which is just wanting them to go on their phones more and more”.*

We agree with the NSPCC that a comprehensive review of all persuasive features is necessary, with most removed from the accounts of young people under 16 years of age and with 16-17 year olds gaining access with additional protections.<sup>31</sup>

**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**

C – both.

**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**

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<sup>30</sup> [NSPCC](#)

<sup>31</sup> [NSPCC](#)

**impact on all users' privacy and data or on business costs, revenue, and innovation.**

If restrictions on specific features or functionalities were introduced, it would be essential to consider carefully which apps and platforms these apply to. Without this clarity, there is a risk of unintended consequences. For example, limiting platforms that are primarily messaging-based, such as WhatsApp, which many young people rely on for everyday communication.

Many of the applications that young people use have been designed to keep users engaged for longer without their knowledge. For example, Instagram has been designed in a way to keep people engaged without them knowing by ensuring that “likes” and other engagement features within posts or stories are withheld and shared over a longer time, thereby encouraging the poster to keep checking the app.<sup>32</sup>

The impact of social media's addictive design features was raised by the pupils we engaged with in our digital inclusion work. Pupils suggested that if young people were banned from social media, some would “pay to scroll” because they feel so dependent on it.

We believe that incentivising constant content consumption and endless engagement at the cost of children and young people's wellbeing is unacceptable and must be addressed effectively. When children and young people access the online world, it should be driven by the positives that these spaces can offer, not a compulsion designed and profited from by companies. We agree wholly with the NSPCC that the scope of the Online Safety Act must be expanded so that tech companies are required to prevent the direct and indirect harm caused by the use of dark design patterns such as autoplay, infinite scroll and persistent notifications.<sup>33</sup>

The UK Government must act to hold industry and commercial interests to account by enforcing existing legislation, requiring greater transparency and data sharing, and targeting the specific features of digital platforms likely to create the most harm.<sup>34</sup>

Some of the young people that participated in our Digital Inclusion project described the model of Roblox age restrictions as a positive thing. This involves using age-based tiers with different restrictions and access. This

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<sup>32</sup> K Omerod, *Why social media is ruining your life* (2018)

<sup>33</sup> [NSPCC](#)

<sup>34</sup> World Health Organisation, *Addressing the digital determinants of youth mental health and well-being: policy brief* (2025), accessed here: [Addressing the digital determinants of youth mental health and well-being: policy brief](#)

includes limitations on access to text and voice chat functions, specific games and content. It was noted that this would be a good approach for other areas of social media.

Young people also described that AI facial recognition is sometimes used to verify users' ages, but that AI often gets this wrong. One young person noted that AI assigned them the incorrect age bracket, placing them in a younger tier with more restrictions than their younger sibling who was placed in an older age bracket. This brought up issues around using different functions and of wanting to communicate with young people their own age. While it is possible to change this by uploading an ID, not everyone has access to one. For example, not even all Young Scot cards have a date of birth listed, so cannot be used as age verification. Young people noted the difficulty of proving age – several comments suggested a high school ID card that could be used as age verification.

We would also like to highlight ideas by the Institute for Public Policy Research (IPPR) in this area.<sup>35</sup> They write how Instagram users overestimate their addiction, and that users describing themselves as addicted find it harder to control their social media use and are more likely to blame themselves than the platforms they use. The work cites how news and media more commonly describe social media in terms of “addiction” than habit, which influences how we describe our use and how much control we feel we have. Compared with addiction, it would be more realistic to examine the habitual, intimate, uncomfortable relationship society has with social media, but also our potential for this to be tackled through compelling social media companies to change how they design their platforms.

The IPPR also highlights how the UK Government could ban manipulative design features to make online experiences safer for young people. While the UK's Online Safety Act focuses on harmful design, it does not address deceptive design. In contrast, Article 25 of the EU Digital Services Act (DSA) explicitly bans dark patterns, preventing platforms from designing services in ways that materially distort users' ability to make free and informed decisions. The DSA also requires large platforms to assess systemic risks arising from their design and to provide researchers with access to data to study these risks. These provisions are not currently included in the Online Safety Act, and expanding the Act to incorporate them would strengthen protections for children and young people.<sup>36</sup>

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<sup>35</sup> Institute for Public Policy Research, *Stuck on you: how to make social media good again* (April 2026), accessed here: [Stuck on you](#)

<sup>36</sup> Ibid.

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

**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.**

Children in Scotland members found it difficult to comment on specific features or apps in isolation, but there was broad concern about services that allow disappearing content, live streaming, nudity-related functions, algorithmic amplification, and anonymity, particularly where these intersect with existing legal and safeguarding frameworks. We have detailed this further in our response to Question 28. Members expressed that decisions about restricting features should be guided by understanding of why young people use them and whether they align with legitimate social, developmental, or creative needs. Again, we would refer to the NSPCC statement, which calls for decisions on restrictions to be based on assessed level of risk and introduced at age-appropriate stages. Furthermore, research into digital regulation presents key recommendations that mirror this, including strengthening the Online Safety Act to include a wider range of platforms (including AI chatbots), and the prioritisation of safety, testing and regulation.<sup>37</sup>

Young people expressed that they want to communicate with others of a similar age, and use social media without interaction from people much older than them. Young people expressed knowledge of the potential dangers of online interactions with people they do not know, and a desire that their content is not seen by people outside of their intended audience. We also heard from young people about a desire for social media channels to have a specific purpose, for channels to be moderated, and for there to be controls and age-based groups around who can see content. As discussed in Chapter 2, although it is not without issues, young people noted the age tier system of Roblox as a positive model as it allows young people to communicate with other people their own age. When asked about the harms of social media, young people underlined a detrimental impact on

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<sup>37</sup> S Wood, Impact of regulation of children's digital lives - Phase II, (May 2026), accessed here: [Impact of regulation of children's digital lives - Phase II](#)

mental health from spending a long time on devices. This is also captured in research on persuasive design.<sup>38</sup>

Across various areas of our engagement, a harm reduction approach was generally preferred over risk elimination framing, recognising that risk cannot be removed entirely from young people's lives, and that young people can and should be equipped with the skills to navigate it, alongside adults. In addition to this, regulation and responsibility from social media companies and the Government is crucial, with restrictions imposed on design choices that permit persuasive, addictive, and manipulative features such as infinite scrolling, autoplay, nudges and streaks.

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

During consultation with our members, online gaming was specifically noted as largely unregulated and associated with addiction and social isolation. We support AI chatbot services being brought within the scope of the Online Safety Act, to tackle all harms such as emotional dependency, false and misleading information, and sexual content. We have responded to questions concerning AI in the following chapter.

**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.***

We recognise the diverse experiences of young people and that young people's environment, existing mental health conditions, stage of development, and age, among other factors influence the harm they may experience online.<sup>39</sup> We acknowledge the need for different levels of

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<sup>38</sup> 5rights Foundation, Disrupted Childhood: The cost of persuasive design (April 2023), accessed here: [5rights\\_DisruptedChildhood\\_G.pdf](#)

World Health Organisation, Addressing the digital determinants of youth mental health and well-being: policy brief (2025), accessed here: [Addressing the digital determinants of youth mental health and well-being: policy brief](#)

protections, features and functionalities across platforms designed for different age groups. For example, Ofcom<sup>40</sup> notes particular risk to 13-15 year olds online, noting that this is the age that young people are more likely to create their own content, and a period where they may be more vulnerable to harmful content. The European Commission notes the impact of social media on adolescents (9-15)<sup>41</sup>.

As before, our members largely did not comment on specific age restrictions for specific functionalities and features, instead noting concern across many issues that have been raised during the consultation and this response. We would highlight the consultation statement from the NSPCC<sup>42</sup>, which outlines the need for assessment and additional protections based on the level of risk in a service. We echo their call for extension of the Online Safety Act to encompass medium and high-risk social media, online gaming, private messaging and AI chatbots. Children in Scotland members also raised concerns around financial harms from spending on social media platforms.

We echo the emphasis on the need to consider evolving platforms, technology and changing risk levels. We see this as a major consideration in ensuring the regulations are able to be kept current and that legislation reflects the current state of play, now and in the future.

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

See question 29

**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.***

As highlighted in Question 17, young people have raised concern over important information that is blocked, for example LGBTQ+ sites, sites with sex

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<sup>40</sup> Ofcom, Children's Register of Risks (April 2025), accessed here: [Children's Register of Risks](#)

<sup>41</sup> European Commission Joint Research Centre, Why are children and adolescents vulnerable to social media? (March 2025), accessed here: [Why are children and adolescents vulnerable to social media? - Joint Research Centre](#)

<sup>42</sup> NSPCC consultation response

education, and resources about puberty. Social media and online health and wellbeing resources have also been raised as particularly to girls who may not have access to the same information in their offline family environments. It is vital that young people under 16 are able to access services, information and support groups (for example around identity, disability, mental health information and support networks) without parental consent.

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

**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.***

N/A

**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

A, B, C, D, E, F, H, J, K, I

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

A, B, C, D, E, F, H, J, K, I

**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**

C.

Please explain the reasoning behind your answer

64% of children and young people in the UK are using AI chatbots.<sup>43</sup> The use by children and young people of AI chatbots was highlighted as a cause of concern and priority to address by members of the Suicide Prevention Participation Network.<sup>44</sup> Members discussed how children and young people are using these chatbots to access support with mental health and are calling for more to be done to educate and support young people.

Alongside taking action to restrict children and young people's access to certain features, we believe that more must be done to ensure that children and young people do not feel that these chatbots are the easiest way to gain support or mental health guidance. When this issue came up with the Suicide Prevention Youth Advisory Group, members told us that they were "*not shocked, but it shouldn't be happening*". There are many risks to vulnerable young people making use of chatbots for support, and it has proven hard for users, regardless of age, to discern what information is real or false or harmful. There have been cases where a young person has come to serious harm or died by suicide after sustained interactions with chatbots.<sup>45</sup> ChatGPT is a generative AI system that tries to pick and generate relevant answers. Where young people discussed the use of chatbots for connection or therapeutic support, one young person noted that "*it can't do the things you want it to do*". There is no predictability, it uses information from huge internet databases. There are also concerns about the bias in the information used by these chatbots and potential connections with right-wing politics.<sup>46</sup>

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<sup>43</sup> Internet Matters (2025) Me, Myself AI: Understanding and Safeguarding Children's Use of AI Chatbots.

<sup>44</sup> This is a network of practitioners who work directly with children and young people in the context of suicide prevention: <https://www.suicideprevention.scot/articles/supporting-young-people>.

<sup>45</sup> Cases in US where families have sued AI platforms (specifically character ai) as they have engaged in self harm and suicide related content with young people which have led to deaths. [Character.AI and Google agree to settle lawsuits over teen mental health harms and suicides | CNN Business](#).

<sup>46</sup> J Baum and J Villasenor, "The politics of AI: ChatGPT and political bias" Brookings (8<sup>th</sup> May 2023), accessed here: <https://www.brookings.edu/articles/the-politics-of-ai-chatgpt-and-political-bias/>

*“Young people are clearly needing support and are so desperate for support. What world are we living in where we don’t question why children are turning to chatbots?”* (Member of the Suicide Prevention Youth Advisory Group)

We support the calls of the NSPCC who highlight that while these tools can support their learning, interactions can lead to serious harm, including emotional dependency, exposure to sexual content, and receiving instructions on self-harm and suicide. All AI chatbot services used by children should be brought within the scope of the Online Safety Act, to tackle all harms such as emotional dependency, false and misleading information, and sexual content. As part of this, children and young people should receive an age-appropriate experience that restricts harmful interactions, enforced through highly-effective age assurance. The Government should also establish a dedicated child safety team within the AI Security Institute to robustly test high-risk AI models and conduct red teaming to ensure risk assessments adequately assess chatbots for risks they pose to children and young people.<sup>47</sup>

**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.**

N/A

### **Chapter 3: Enforcement and compliance**

#### **Age assurance**

**If online minimum age restrictions were to be introduced, services in scope would need to prove that their users were above the required age. Age assurance methods include, but are not limited to, facial age estimation, photo ID matching, AI and biometric based systems, and age inference (where AI predicts age based on online behaviour).**

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

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<sup>47</sup> [NSPCC](#)

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.***

N/A, we do not have enough evidence to answer this question.

**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.***

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

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

### Circumvention of age limits

Virtual Private Networks (VPNs) are tools that create a secure private connection between your device and the internet. They are used for several purposes, such as protecting sensitive communications and protecting privacy, including in a corporate context.

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

N/A

**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) e. Don't know/ Prefer not to answer

D.

**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

D.

**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 agree with the contributions of the NSPCC who highlight that VPNs offer children legitimate benefits, including protecting their personal information and giving them greater control over their online privacy. Banning them would remove these protections without making children meaningfully safer, as the evidence shows children are not using VPNs to circumvent safety measures at scale. Rather than restricting access to a legitimate privacy tool, the focus should be on ensuring that platforms use available tools to detect and address circumvention, and providing greater regulatory clarity on how to ensure robust protections can work alongside VPN usage.<sup>48</sup>

**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.**

### **Mobile phones in schools – both look at research in Scotland**

In February 2026, the Department for Education (DfE) updated the guidance on mobile phones in schools and stipulated that all schools should be mobile phone-free environments by default unless there is a good reason for phones to be in use.

**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**

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<sup>48</sup> [NSPCC](#)

***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.**

N/A

**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)**

There is currently no national ban on mobile phones in Scottish schools. Instead, decisions are made locally by schools and local authorities, and approaches vary widely. Some schools allow limited use during breaks, while others require phones to be kept in bags or handed in during the school day. We note that two Scottish schools recently trialled a no mobile phone policy and we would recommend the Department for Science, Innovation & Technology consider the findings from these pilots.

We have not reached a set position on whether mobile phones should be prohibited in schools, and the young people we have engaged with do not hold a consensus view. Some feel that restricting phones could reduce distractions, improve focus, and support wellbeing. Others emphasise that phones are an important tool for safety, communication, and accessing essential services.

Young people from our Digital Inclusion project told us that not having access to their phones or having strict limits on screen time can affect their ability to use everyday services such as online banking. Several noted the contradiction between being able to open a bank account at age 11, while

phone access is often restricted until they are older. This issue also emerged in discussions about phones in schools. If young people are not allowed their phones throughout the school day, including at break times, this may limit their ability to pay for food, manage travel, or contact their families when needed.

Overall, the impacts of restricting mobile phone use in schools are complex. Young people recognise both the potential benefits and the practical challenges. Any future policy would need to balance wellbeing and learning with the realities of how essential digital access has become in young people's daily lives.

## **Chapter 4: Preparing children for a digital future**

### **Media and digital literacy**

**Media literacy is about understanding, questioning, and making sense of the content you see online. It helps children tell the difference between fact and opinion, check sources and assess their trustworthiness, and recognise how online content can affect thoughts, feelings and behaviour.**

**Digital literacy means having the practical skills to use devices and online services safely, confidently and independently. This includes knowing how to set up and use devices, recognising scams, protecting personal information, and managing everyday digital tasks.**

**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)**

Options A – l.

Improving media and digital literacy across the whole of the UK is essential to ensure that children and young people can navigate the online world safely, confidently and in ways that support their wellbeing. We believe that digital

literacy must go much further beyond basic online safety messages and include practical skills, critical thinking and knowledge and support about healthy digital habits. As the online world changes rapidly, it is crucial that this education is kept up to date.

The improvement of digital and media literacy is one of the priority actions highlighted in the World Health Organisation Europe policy brief *Addressing the digital determinants of youth mental health and well-being*.<sup>49</sup> This briefing also highlights numerous environmental risk factors that increase children and young people's vulnerability online that could be alleviated by better education for families. These include weak family communication, education that parents have received, uncontrolled use of technology, strict parental monitoring and parental phubbing (ignoring one's immediate social interactions in favour of engaging with a smartphone) and negative modelling.<sup>50</sup> Strengthening digital literacy therefore requires supporting children, young people and families to increase their awareness.

Young people we engaged with through Changing our World and our Digital Inclusion project consistently told us that the education they receive is too limited. While schools often repeat basic online safety lessons (such as not speaking to strangers online) these sessions rarely expand into areas young people say they need, such as digital wellbeing, recognising misinformation, or understanding how social media platforms shape behaviour.

Pupils described learning the essentials, like using strong passwords, but said they mostly taught themselves how to stay safe online. They were aware of online dangers but felt unprepared for the realities of social media. As one young person put it, *"We have several cyberbullying classes a year at school but I don't think that's enough to show people how terrible social media is and how much of it is lies and fake."*

There was strong agreement that everyone, not just children and young people, needs better digital education. Young people emphasised that safe and healthy online habits should be taught in a way that evolves as they grow older, rather than repeating the same primary school content. They told us it would be useful and important to learn more about digital wellbeing,

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<sup>49</sup> World Health Organisation, *Addressing the digital determinants of youth mental health and well-being: policy brief (2025)*, accessed here: [Addressing the digital determinants of youth mental health and well-being: policy brief](#)

<sup>50</sup> World Health Organisation, *Addressing the digital determinants of youth mental health and well-being: policy brief (2025)*, accessed here: [Addressing the digital determinants of youth mental health and well-being: policy brief](#)

how to use social media safely, and how to assess critically what they see online.

Overall, improving digital and media literacy means equipping children, young people, and families with the skills, understanding, and habits needed to use digital spaces safely and positively. It requires education that keeps pace with the realities of young people's online lives and supports them to thrive, not just avoid harm or risk.

**53. If you are responding as a private individual, where do you go for help with online safety or media literacy skills? *By online safety or media literacy skills, we mean things like staying safe online, understanding digital content and using the internet confidently and responsibly.* (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 (including places of worship) f. Non-governmental online sources (such as websites, platforms or online communities) g. Government websites h. Tools and resources on online platforms 69 i. j. None of the above/I haven't used any of these to find help Don't know/ Prefer not to answer k. Other (please specify)**

**What made these places helpful? *Please share any programmes, resources or activities that you have found useful.***

N/A

**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)**

N/A

**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)**

Options A – F.

### **Promoting high quality content**

**We know that access to high quality content can be beneficial for children. By high quality online content, we mean content that can have positive impacts on children's learning and development.**

**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)**

N/A

**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.***

N/A

## **Chapter 5: Supporting families**

### **Parental controls**

**Many online platforms provide parental control tools which allow parents and carers to oversee and place parameters around children's online activity, including content, time and functionality-based restrictions.**

**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.**

**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.***