



Growing up in the online world: a national consultation

Response from Together (Scottish Alliance for Children's Rights)

About Together (Scottish Alliance for Children's Rights)

Together (Scottish Alliance for Children's Rights) is an alliance that works to improve the awareness, understanding and implementation of the UN Convention on the Rights of the Child (UNCRC) and other international human rights treaties across Scotland. We have over 600 members ranging from large international and national non-governmental organisations (NGOs) through to small volunteer-led after school clubs and interested professionals. The views expressed in this submission are based on wide consultation with our members but may not necessarily reflect the specific views of every one of our member organisations. Views expressed separately should also be taken into account.

Introduction

Together (Scottish Alliance for Children's Rights) welcomes the opportunity to comment on UK Government's proposals for measures that aim to protect children and young people growing up in an increasingly digital world. Amidst rapid technological advancements, it is crucial to ensure that children and young people feel safe, empowered, and confident when participating in online life, while also mitigating the potential dangers that come with the use of social media and other digital technologies.

Our response is informed by the UN Convention on the Rights of the Child (UNCRC), alongside guidance from the UN Committee on the Rights of the Child (UN Committee) in the form of General Comments and recent Concluding Observations to the UK issued in 2023. It makes reference to academic perspectives, research reports from civil society, and the views of children and young people in Scotland. We also draw on the lived experiences of children and young people in Australia, where a social media ban for under-16s has been in place since December 2025. We would especially like to thank the young people working with the Australian Youth Affairs Coalition (AYAC) and Project Rokit for taking the time to meet with us and for sharing their insights and firsthand experiences.

A blanket ban on social media for children under a certain age is neither an effective nor children's rights-respecting way forward. Social media and online platforms can support children's rights in some contexts and undermine them in others; children and young people across the globe have expressed that it is how these technologies are designed, moderated, and governed that determines their impact. A blanket ban does not tackle the underlying drivers of online harm, including platform design, algorithmic amplification or the prevalence of harmful content. It also risks unintended consequences – pushing young people towards less regulated platforms, and making them less likely to seek help if they encounter harmful content while circumventing restrictions for fear they will get into trouble.

We have answered the consultation questions most relevant to our expertise, and insofar as our capacity has allowed. We also encourage UK Government to have regard to submissions from our member organisations.

We call on the UK Government to ensure that any proposed reforms fully respect, protect, and fulfil children’s rights in the digital environment. UK Government should:

- **Engage with children and young people from the outset to adopt a nuanced, effective approach that achieves the right balance between autonomy and protection, and the opportunities and risks that come with the use of social media and online platforms.**
- **Ensure any measures taken are necessary and proportionate, and that reforms align with the rights and needs of children and young people.**
- **Conduct and publish a Child Rights Impact Assessment (CRIA) for any proposals to assess their compatibility with children's rights standards and international obligations, and identify any necessary mitigations.**

GROWING UP IN THE ONLINE WORLD

Chapter 1: Understanding how children use technology

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

Social media use, engaging in online life, and digital technologies can play an important role in upholding and furthering the rights of children and young people, as they can help them to build a stronger understanding of and exercise their rights in both online and offline contexts. The UN Committee corroborates this in General Comment no. 25, noting that “meaningful access to digital technologies can support children to realize the full range of their civil, political, cultural, economic and social rights”.¹

More specifically, social media and other online platforms have revolutionised the way children and young people make themselves heard and exercise their right to freedom of expression and information (Articles 12 and 13). Children and young people often use social media to mobilise and advocate for issues that concern them, effectively amplifying their voices to decision-makers and allowing them to partake in online life as active and well-informed citizens.² They also report that in a post-pandemic world, where geopolitical instability is increasingly rife, they rely on social media for health and safety-related information, alerts, and support.³ On a micro-level, children and young people say that social media can provide a creative outlet, allowing them to further develop their interests and use various mediums to share their opinions, emotions, and talents. Both the large- and small-scale benefits that social media can bring to the

¹ CRC/C/GC/25. Para 4.

² Dr Dean Farquhar, Nellie Wotherspoon, Krushnadevsinh Ravalji (2025). *Consultations with children and young people on the social media minimum age*. p9. <https://www.esafety.gov.au/sites/default/files/2025-09/Summary-of-consultations-children-young-people-July-August-2025.pdf?v=1757052693458> [date accessed: 20.05.2026]

³ *Ibid.* See also UNICEF (2026). *Children’s Best Interests in Digital Policy and Practice*. p47-48. <https://www.unicef.org/innocenti/media/12841/file/UNICEF-Innocenti-Children's-Best-Interests-Digital-Policy-Practice-report-2026.pdf> [date accessed: 20.05.2026]

lives of children and young people make it an invaluable avenue for self-expression and information-seeking.

A 2026 report by UNICEF Innocenti found that many children and young people across countries and age groups hold the view that social media and digital technologies align with their best interests (Article 3) as it supports their right to education (Article 28), amongst other factors.⁴ Owing to the wealth of educational content and platforms available online, they view online learning as an important supplement to formal education especially where contact hours and/or resources are limited, and place emphasis on the flexibility to learn anytime, anywhere, through a range of engaging mediums.⁵ Many young people also highlight the role of digital technologies in improving life outcomes, as they facilitate customisable learning experiences and opportunities to explore subjects that may be outwith school curricula and/or otherwise inaccessible in local offline contexts. Using social media to learn important practical skills and/or creative hobbies such as cooking, coding, sewing, DIY projects, and myriad others can contribute towards their general independence or the pursuit of their academic/professional aspirations.⁶

The UN Committee makes clear in General Comment no. 25 that governments should take steps towards creating more inclusive digital environments, an outcome which social media can facilitate by fostering social connection and bridging socioeconomic, cultural, and geographical gaps.⁷ Young people use social media to stay in touch with friends and family who may be based elsewhere in the country and/or overseas, and even forge long-distance friendships with other young people across the globe who they may have met through gaming or other shared interests.

Children and young people in Australia and Scotland alike report that social media can have a particularly positive impact on groups whose rights are more at risk; for example, online platforms can allow young people living in rural, regional, or remote areas to communicate with peers or take advantage of opportunities that are difficult to access locally.⁸

“Being online can help people in rural areas connect/make friends with people outside of their local community.”

— anonymous, supported by Scottish Youth Parliament (SYP) and Scouts Scotland⁹

⁴ UNICEF (2026). *Children’s Best Interests in Digital Policy and Practice*. p29. <https://www.unicef.org/innocenti/media/12841/file/UNICEF-Innocenti-Children's-Best-Interests-Digital-Policy-Practice-report-2026.pdf> [date accessed: 20.05.2026]

⁵ Ibid.

⁶ Ibid. See p30.

⁷ CRC/C/GBR/CO/6-7. Para 29.

⁸ Dr Dean Farquhar, Nellie Wotherspoon, Krushnadevsinh Ravalji (2025). *Consultations with children and young people on the social media minimum age*. p10. <https://www.esafety.gov.au/sites/default/files/2025-09/Summary-of-consultations-children-young-people-July-August-2025.pdf?v=1757052693458> [date accessed: 20.05.2026]

⁹ Together (Scottish Alliance for Children’s Rights) (2024). *State of Children’s Rights Report 2024*. p146. https://www.togetherscotland.org.uk/media/3800/socrr2024_final.pdf [date accessed: 20.05.2026]

Social media may also provide a sense of community for other marginalised groups, such as LGBTQ+ youth, young people from minoritised ethnic backgrounds, homeschooled young people, and disabled or chronically-ill young people, allowing them to connect with others in different countries with similar lived experiences.¹⁰ Online platforms can thus improve the lives of some children and young people by fostering connections, bringing opportunities to their doorstep, and providing a source of support for those who need it.

Question 10: What are the harms or risks of social media use, and being online, for children?

While social media use and digital technologies can present new opportunities to secure further effect for children's rights, the UN Committee acknowledges that online life can pose certain risks to children and young people and give rise to potential breaches of their rights.¹¹ Such dangers must be mitigated to allow children and young people to navigate online spaces safely and confidently.

One prominent risk is exposure to harmful material; the UN Committee is cognisant of this, calling on states to protect young people from such detrimental or otherwise untrustworthy content in General Comment no. 25.¹² Young people across the globe have raised similar concerns; they are wary of various things they see online, ranging from digital distractions such as advertisements, to outright malicious content. Some recall coming across misinformation, while others report encounters with posts promoting hateful rhetoric/ideals, unrealistic beauty standards, or even explicit/indecent images.¹³ Some may even be the targets of discrimination and/or hate speech, cyber bullying, blackmail, and grooming or other forms of sexual exploitation themselves.¹⁴ Moreover, algorithmically-curated 'echo chambers' can intensify existing vulnerabilities by repeatedly exposing children and young people to harmful or polarising content,¹⁵ which in turn may compromise their physical, psychological and mental wellbeing and affect their right to health (Article 24).

"I spend a lot of time online. I think most of my friends I have made are from the internet. I don't feel overly safe online as I have had bullying and creeps messaging me. I have received unsolicited images from boys too."

¹⁰ Dr Dean Farquhar, Nellie Wotherspoon, Krushnadevsinh Ravalji (2025). *Consultations with children and young people on the social media minimum age*. p10. <https://www.esafety.gov.au/sites/default/files/2025-09/Summary-of-consultations-children-young-people-July-August-2025.pdf?v=1757052693458> [date accessed: 20.05.2026]

¹¹ CRC/C/GC/25. Para 3.

¹² Ibid. See para 54.

¹³ Dr Dean Farquhar, Nellie Wotherspoon, Krushnadevsinh Ravalji (2025). *Consultations with children and young people on the social media minimum age*. p8. <https://www.esafety.gov.au/sites/default/files/2025-09/Summary-of-consultations-children-young-people-July-August-2025.pdf?v=1757052693458> [date accessed: 20.05.2026]

¹⁴ Western Sydney University and 5Rights Foundation (2021). *Our Rights in a Digital World*. p65-66. <https://5rightsfoundation.com/wp-content/uploads/2024/09/OurRightsinaDigitalWorld-FullReport.pdf> [date accessed: 20.05.2026]

¹⁵ Science Media Centre (2026). *Expert Comments on Evidence on Benefits and Harms of Social Media and Social Media Bans on Young People*. <https://www.sciencemediacentre.org/expert-comments-on-evidence-on-benefits-and-harms-of-social-media-and-social-media-bans-on-young-people/> [date accessed: 20.05.2026]. See Dr Holly Bear's remarks.

— Alice, age 17, South Lanarkshire¹⁶

Even where children are not exposed to harmful content, the very practices of using digital technologies and online engagement can inadvertently undermine the right of children and young people to a healthy life. Young people report that social media use has caused adverse impacts to both their physical and mental health; they describe struggles with fatigue, sleep deprivation, eye strain, and back pain, in addition to symptoms of anxiety and stress.¹⁷ They also point out that excessive engagement in online spaces and digital play can negatively affect their daily routines by reducing motivation to engage in real-life activities and responsibilities, such as schoolwork, chores, physical play and spending time with friends and family.¹⁸ Such factors must be addressed in order to ensure that digital technologies complement and enrich the lives of children and young people, rather than compromise their ability to meet their basic needs and lead happy, healthy lives.

Moreover, while social media and online platforms can broaden the horizons of children and young people and support their rights to information and education (Articles 13 and 28), it is equally true that they may fall victim to the misinformation and disinformation that are rife in the contemporary digital world, especially given rapid advancements in artificial intelligence (AI) and the rise of AI-generated content. Over-reliance on AI tools has also been shown to undermine independent thinking, analytical skills, and authentic learning experiences, which could hinder the development of cognitive abilities in children and young people.¹⁹

Furthermore, children and young people who use social media and other digital technologies may experience breaches of their right to privacy (Article 16). Reports of data misuse by technology companies have long circulated, with many lamenting the opacity of data collection and storage policies, and the sale of data to third-parties without users' informed consent.²⁰ Children are no exception to this trend; many children and young people voice concerns about the use and weaponisation of their private information, messages, and photos and videos. In extreme cases, this may cause them to fall victim to scams and/or instances of identity misuse/theft,²¹ thus giving rise to a breach of their right to protection from harm (Article 19).

As set out in our later answers, a blanket ban on social media for under-16s is unlikely to address these concerns effectively. A ban will do nothing to tackle the prevalence of harmful content, nor will it fundamentally reinvent social media algorithms. Instead, it risks pushing

¹⁶ Together (Scottish Alliance for Children's Rights) (2024). *State of Children's Rights Report 2024*. p150.
https://www.togetherscotland.org.uk/media/3800/socrr2024_final.pdf [date accessed: 20.05.2026]

¹⁷ UNICEF (2026). *Children's Best Interests in Digital Policy and Practice*. p12 and 15.
<https://www.unicef.org/innocenti/media/12841/file/UNICEF-Innocenti-Children's-Best-Interests-Digital-Policy-Practice-report-2026.pdf> [date accessed: 20.05.2026]

¹⁸ Ibid. See p43.

¹⁹ Ibid. See p32.

²⁰ Western Sydney University and 5rights Foundation (2021). *Our Rights in a Digital World*. p28.
<https://5rightsfoundation.com/wp-content/uploads/2024/09/OurRightsinaDigitalWorld-FullReport.pdf> [date accessed: 20.05.2026] See also UNICEF (2026). *Children's Best Interests in Digital Policy and Practice*. p16.
<https://www.unicef.org/innocenti/media/12841/file/UNICEF-Innocenti-Children's-Best-Interests-Digital-Policy-Practice-report-2026.pdf> [date accessed: 20.05.2026]

²¹ UNICEF (2026). *Children's Best Interests in Digital Policy and Practice*. p22.
<https://www.unicef.org/innocenti/media/12841/file/UNICEF-Innocenti-Children's-Best-Interests-Digital-Policy-Practice-report-2026.pdf> [date accessed: 20.05.2026]

children towards less regulated platforms outside the scope of the ban. Evidence from around the world also shows that younger children often use various means to circumvent age restrictions²² – but are then less likely to seek help when they encounter harm, for fear of being punished. We urge UK Government to put children’s rights at the heart of decision making, instead of resorting to a ‘one-size-fits-all’ solution.

²² Dr Dean Farquhar, Nellie Wotherspoon, Krushnadevsinh Ravalji (2025). *Consultations with children and young people on the social media minimum age*. p15. <https://www.esafety.gov.au/sites/default/files/2025-09/Summary-of-consultations-children-young-people-July-August-2025.pdf?v=1757052693458> [date accessed: 20.05.2026] See also UNICEF (2026). *Children’s Best Interests in Digital Policy and Practice*. p50. <https://www.unicef.org/innocenti/media/12841/file/UNICEF-Innocenti-Children's-Best-Interests-Digital-Policy-Practice-report-2026.pdf> [date accessed: 20.05.2026]

Chapter 2: Interventions for safer, more positive experiences

Restricting social media services by age

Question 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~~

Question 15: What do you think the impacts would be of having a minimum age requirement higher than 13 for social media services?

The impacts of increasing the minimum age of access for social media services would be manifold, impacting a range of children’s UNCRC rights. The exact nature of the impacts depends largely on whether the ban is ‘effective’ in practice — that is, whether it can genuinely prevent under-16s from accessing social media — or whether, as evidence from Australia suggests, it is widely circumvented.

“I feel like it [the social media ban in Australia] doesn't impact a lot of the younger grades in my school, because there are multiple ways to bypass it. Like I can think of multiple ways such as Reddit, incognito [mode], or a VPN.”

— Mannon, age 17, supported by Project Rockit

If a higher minimum age could be easily enforced, this could significantly curb social interaction for those under the minimum age. As aforementioned, children and young people living in rural areas and/or those belonging to marginalised groups may be disproportionately affected by such a change. They may struggle with feelings of isolation due to reduced opportunities, narrower social circles, and less sources of support. Additionally, children and young people in Australia point out that if a minimum age of access to social media services is imposed, those on the cusp of that age and who have friends and family over that age may find themselves

detached from their social connections if they are unable to participate in online interactions.²³ This could lead to a deterioration in mental health and wellbeing, thus impacting upon the Article 24 right to health.

However, experience in Australia suggests that age-based bans are unlikely to be fully effective, with many children able to bypass restrictions. As such, a ban for under-16s is unlikely to substantially reduce access to social media, but would simply change *how* and *where* children access it. For instance, children and young people may circumvent age verification processes, or start using unregulated online platforms that are excluded from the scope of a social media ban. This could lead to a paradoxical increase in the likelihood of harm and exposure to inappropriate content, with children less likely to seek support, particularly if they fear consequences for ‘breaking the rules’.²⁴

“I definitely think it [a social media ban for under-16s] would make them less likely [to seek help]. [...] It's difficult because you don't want to get in trouble but then you'd also be throwing yourself under the bus as well, so it puts them in a really difficult position [...] and it just gets very tricky.”

— Emily, age 13, supported by Project Rockit

Crucially, whether effective or circumvented, an age-based ban does not address the root causes of online harm. It does not tackle the role of platform algorithms in creating addiction, or promoting harmful content, nor does it address issues around digital and media illiteracy. Increasing the minimum age of access to social media platforms does not mean that children and young people reaching that age will automatically be able to confidently navigate online spaces and the risks that come with them. Instead, this would reduce opportunities for them to learn how to participate in online life safely and responsibly, rendering them even more vulnerable to the potential dangers of social media use.²⁵ Professor Miranda Pallan from the University of Birmingham cautions that if the minimum age for social media services is increased, UK Government should consider ways to support young people reaching that age with the transition into a world where social media use is highly prevalent across both personal and professional spaces.²⁶

²³ Dr Dean Farquhar, Nellie Wotherspoon, Krushnadevsinh Ravalji (2025). *Consultations with children and young people on the social media minimum age*. p10. <https://www.esafety.gov.au/sites/default/files/2025-09/Summary-of-consultations-children-young-people-July-August-2025.pdf?v=1757052693458> [date accessed: 20.05.2026]

²⁴ Dr Dean Farquhar, Nellie Wotherspoon, Krushnadevsinh Ravalji (2025). *Consultations with children and young people on the social media minimum age*. p6, 7, and 14. <https://www.esafety.gov.au/sites/default/files/2025-09/Summary-of-consultations-children-young-people-July-August-2025.pdf?v=1757052693458> [date accessed: 20.05.2026]

²⁵ Science Media Centre (2026). *Expert Comments on Evidence on Benefits and Harms of Social Media and Social Media Bans on Young People*. <https://www.sciencemediacentre.org/expert-comments-on-evidence-on-benefits-and-harms-of-social-media-and-social-media-bans-on-young-people/> [date accessed: 20.05.2026]. See Prof. Chris Ferguson’s remarks.

²⁶ Science Media Centre (2026). *Expert Comments on Evidence on Benefits and Harms of Social Media and Social Media Bans on Young People*. <https://www.sciencemediacentre.org/expert-comments-on-evidence-on-benefits->

Importantly, many children and young people around the world have voiced their opposition to a blanket ban on social media for those under the minimum age of access, arguing that such an approach would be extremist and contrary to their best interests.²⁷ While they recognise the risks associated with social media, such as harmful content and cybercrimes, they also highlight the numerous benefits that these platforms bring to their lives, explaining that the possibilities for learning, creativity, entertainment, and social interaction could be curtailed by an increase to the minimum age of access.²⁸ They express that such one-size-fits-all changes are unfair and disproportionate, as a strict age-based approach fails to account for nuances that shape individuals' online experiences, such as maturity and personal usage habits.²⁹ Raising the minimum age of access from 13 could thus run counter to the needs of children and young people and the sentiments they have raised, carrying negative implications for their best interests (Article 3) and right to be heard (Article 12).

In summary, a higher minimum age for social media access is unlikely to be an effective solution. If enforceable, it would significantly restrict children's rights and access to important opportunities; if, as is more likely, it is widely circumvented, it would do little to reduce access while introducing new and unintended risks. For these reasons, we do not support the introduction of a ban on under-16s. UK Government should instead ensure that policy efforts address the design, governance, and safety of online environments themselves, working closely with children and young people to design solutions.

Chapter 3: Enforcement and Compliance

Age assurance

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

Age assurance technologies are increasingly used in a variety of online contexts, with a view to protecting children from harms that may arise in the digital world. It is now commonplace for technology companies and online platforms to verify users' age through means such as official documents, age estimation technology, self-declaration, and third-party checks. However, these techniques are not always effective. Children and young people support age assurance as a form of protection in theory and acknowledge that it is well-intentioned, but say that it is ultimately ineffective as such checks can be easy to circumvent.³⁰ They also worry that more demanding

[and-harms-of-social-media-and-social-media-bans-on-young-people/](#) [date accessed: 20.05.2026]. See Prof. Miranda Pallan's remarks.

²⁷ UNICEF (2026). *Children's Best Interests in Digital Policy and Practice*. p40.
<https://www.unicef.org/innocenti/media/12841/file/UNICEF-Innocenti-Children's-Best-Interests-Digital-Policy-Practice-report-2026.pdf> [date accessed: 20.05.2026]

²⁸ Ibid.

²⁹ Ibid.

³⁰ Ibid. See p50.

age checks could further infringe on their privacy and/or present new risks to their identity (Articles 16 and 8).³¹

“Facial recognition [...] doesn’t work.”

— Azuki, age 14, supported by Australian Youth Affairs Coalition (AYAC)

“I know someone who drew, like, black lines on her face to act as wrinkles [...] The photo looks ridiculous, but she got through. [...] When it [the ban] happened for me, we were on Year Nine camp. And everyone went around to this one guy and got his face to use it because he looked old enough to be above 16. I reckon there's like 30 people who just have this same guy's face as the face that was judging their age.”

— Darcey, age 15, supported by Project Rockit

Moreover, experts warn that age assurance technologies and the algorithmic biases inherent to them may result in discriminatory outcomes. Systems relying on biometrics, such as facial structure, may affect children and young people from ethnic minority backgrounds and/or disabled individuals, amongst others; for instance, facial recognition technologies may be ineffective for those with darker skin tones or medical conditions that affect physical appearance.³² Equally, where platforms require proof of identity as part of age assurance, this process presumes that children and young people have access to these official documents in the first place. Such an assumption could be disadvantageous to those from lower socioeconomic backgrounds, as they may be less likely to have a passport or driver’s licence, and may thus be barred from accessing social media and other online spaces as a result. This, in turn, could give rise to a breach of their UNCRC Article 2 right to non-discrimination.

Overall, though implementing age assurance mechanisms across more platforms may give the illusion of increased security on the surface, there are little tangible benefits to doing so. Not only are they unfit for purpose in the ease with which they can be bypassed, but they may also produce and entrench discriminatory outcomes, leading to a negative impact for children’s rights in the digital context.³³

³¹ Ibid. See p55. See also *Dr Dean Farquhar, Nellie Wotherspoon, Krushnadevsinh Ravalji (2025). Consultations with children and young people on the social media minimum age. p13.*

<https://www.esafety.gov.au/sites/default/files/2025-09/Summary-of-consultations-children-young-people-July-August-2025.pdf?v=1757052693458> [date accessed: 20.05.2026]

³² Information Commissioner’s Office (ICO) (no date). Section 6.3.3. <https://ico.org.uk/about-the-ico/what-we-do/information-commissioners-opinions/age-assurance-for-the-children-s-code/6-expectations-for-age-assurance-and-data-protection-compliance/> [date accessed: 20.05.2026]

³³ Livingstone, S; Nair, A; Stoilova, M; van der Hof, S; Caglar, S (2024). 'Children’s rights and online age assurance systems: the way forward.' *International Journal of Children’s Rights*. 32(3). 721-747. See p722.

“People can bypass it [the ban] - that's my only advice to Keir Starmer. He should be aware that people can obviously bypass it, so it does become largely ineffective at a larger scale.”

— Mannon, age 17, supported by Project Rocket

Mobile phones in schools

Question 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)

A discussion paper published by Edinburgh Council in January 2026 regarding a ban on mobile phones in primary schools acknowledged that restrictions on phones should not be absolute, especially where students have medical or caring needs.³⁴ It also gave credence to some children and young people's concerns that restrictions on phone usage would be incompatible with their rights, and emphasised the need to consider different children's socioeconomic and developmental circumstances.³⁵

“The new rule about no phones is hard when your parents are away and you haven't heard from them. If my dad is at work or at sea and my mum is on a late shift – I need to know to feel safe – I need my phone!”

³⁴ Edinburgh Council (2026). *Mobile Phones in Schools Update*. p2.

<https://democracy.edinburgh.gov.uk/mqConvert2PDF.aspx?ID=92778> [date accessed: 20.05.2026]

³⁵ Ibid. See p8.

— anonymous, supported by SYP and Forces Children Scotland³⁶

Additionally, research by Forces Children Scotland highlights that restrictions on mobile phone use in schools can disproportionately impact children in armed forces families. Such children rely on mobile phones to stay in touch with parents and/or carers in deployment, whether that be through phone calls or emails.³⁷ They explain that easy access to a mobile phone and staying in contact with their serving parent/carer is not only a matter of convenience, but also about meeting their psychological needs for peace of mind and to feel a sense of security.³⁸ Allowing children of deployed parents to have and/or use mobile phones throughout the day is therefore important for their emotional wellbeing, supporting their Article 24 right to health, but also for their Article 9 right to maintain relations and direct contact with a parent when separated.

Chapter 4: Preparing Children for a Digital Future

Media and digital literacy

Question 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~~

Promoting high quality content

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

³⁶ Together (Scottish Alliance for Children's Rights) (2024). *State of Children's Rights Report 2024*. p146.
https://www.togetherscotland.org.uk/media/3800/socrr2024_final.pdf [date accessed: 20.05.2026]

³⁷ Forces Children Scotland (2024). *It's Not Just Their Job, It's Our Whole Lives*. p29.
<https://forceschildrenscotland.org.uk/app/uploads/2024/07/FCS-Its-not-just-their-job-its-our-whole-lives-Rights-Report-2024.pdf> [date accessed: 20.05.2026]

³⁸ Together (Scottish Alliance for Children's Rights) (2024). *State of Children's Rights Report 2024*. p146.
https://www.togetherscotland.org.uk/media/3800/socrr2024_final.pdf [date accessed: 20.05.2026]

- 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)**

Consultation with children and young people

UK Government should aim to create online spaces that “balance safety with autonomy, privacy with guidance and protection with respect for children’s agency and evolving capacities.”³⁹ To this end, and in line with Paragraph 17 of General Comment no. 25, UK Government should seek and facilitate further opportunities for consultation with children and young people.⁴⁰ On the one hand, direct engagement will help decision-makers better understand the role of social media and digital technologies in young people’s lives, and can shed light on what they should do to minimise the potential risks of the online world. On the other hand, it provides an opportunity for young people to make their voices heard regarding positive online spaces and what these would look like based on their lived experiences (Article 12). Devising policies, tools, and practices in the best interests of young people requires that they are involved in such processes from the outset, in order to ensure that decisions are made with, rather than for, them (Article 3). UK Government should also complete and publish a Child Rights Impact Assessment (CRIA) to examine the potential child rights-related impacts of any policy proposals, which should be informed by insights from such engagement efforts.

Particular attention should be paid to children and young people from groups who may rely more on social media and digital spaces for support, opportunities, and/or information. UK Government should seek their input to ensure that any policy changes cause minimal disruption to their rights, and that they account for mitigations to alleviate any negative consequences, whether related to health, education, leisure, or other facets of their daily lives.

Children and young people across the world understand themselves as “active agents of change” rather than “passive recipients of protection”, and are eager to contribute towards a safer, kinder online world.⁴¹ It is thus crucial that they are not isolated from the very high-level

³⁹ UNICEF (2026). *Children’s Best Interests in Digital Policy and Practice*. p13.
<https://www.unicef.org/innocenti/media/12841/file/UNICEF-Innocenti-Children's-Best-Interests-Digital-Policy-Practice-report-2026.pdf> [date accessed: 20.05.2026]

⁴⁰ CRC/C/GC/25. Para 17.

⁴¹ UNICEF (2026). *Children’s Best Interests in Digital Policy and Practice*. p19.
<https://www.unicef.org/innocenti/media/12841/file/UNICEF-Innocenti-Children's-Best-Interests-Digital-Policy-Practice-report-2026.pdf> [date accessed: 20.05.2026]

discussions that aim to shape these spaces and for decision-makers to show them that their perspectives carry weight in such contexts.⁴²

Stronger accountability mechanisms

“Social media companies are not being held accountable for the bad stuff that is being put out onto there, and instead, younger people who just want to exist on the online space are having to [...] suffer for it.”

— Darcey, age 15, supported by Project Rockit

Children and young people are frustrated by the longstanding failure of technology companies to take swift and decisive action against harmful content and conduct, which may be conducive to a more dangerous online environment.⁴³ They lament the patchy enforcement of rules across digital platforms, and want clearer, stronger consequences for those who repeatedly violate platform rules.⁴⁴ To this end, UK Government should consider working with these companies to implement more robust accountability mechanisms, with platforms, communities, and legal systems all playing a part in ensuring that rules that keep online spaces safe and positive are upheld universally.

“No one needs to be seeing harmful content, like, that's the whole point of the ban, right? To stop children from seeing harmful content. But why does it need to be there in the first place? That's what should be getting banned - instead of the children using the app.”

— Emily, age 13, supported by Project Rockit

Education

While guidance may provide a good starting point in helping children and young people stay safe online, it could be effectively bolstered by additions to school curricula focusing on critical thinking skills and media and digital literacy. The aforementioned report by UNICEF Innocenti argued that children should start to receive age-appropriate education on the opportunities, risks and ethics of the online world from a young age, in order to build their awareness of the functions, benefits, and harms of digital tools before they gain full access to such technologies.⁴⁵

⁴² CRC/C/GC/25. Para 17.

⁴³ UNICEF (2026). *Children's Best Interests in Digital Policy and Practice*. p62.

<https://www.unicef.org/innocenti/media/12841/file/UNICEF-Innocenti-Children's-Best-Interests-Digital-Policy-Practice-report-2026.pdf> [date accessed: 20.05.2026]

⁴⁴ Ibid.

⁴⁵ Ibid. See p68.

This can better equip them with the confidence needed to navigate digital spaces and prepare them for different types of situations they may encounter while online.

“I definitely think school should be helping us learn how to be on it safely and if stuff goes wrong, how to deal with the things. Educate us, [especially] the older generation, like, parents and stuff, about how to help their kids if they're going through it [unpleasant online experiences].”

— Azuki, age 14, supported by AYAC

Further support could come in the form of resources for parents and carers, educating them on the online tools commonly used by children for both educational and leisure purposes, as well as warning against parental overreach and the potential negative consequences this could bring. Children and young people say this may allow parents to encourage responsible online behaviour at home, while also allowing their children the autonomy to explore and reap the benefits of digital platforms.⁴⁶

Safety and inclusivity by design

Children and young people across the globe call on technology companies to prioritise wellbeing over profit, and to ensure respect for their privacy and data protection (Article 16).⁴⁷ One way to ensure that platforms and safety mechanisms adequately address the needs, lived experiences, and concerns of children and young people is by involving them in the design and/or re-design process of online spaces. This would allow for the creation of child-centric and child-adaptive digital environments where children can more freely explore and harness the benefits of online life within the confines of relative safety.⁴⁸

One solution that some children put forward involves the creation of separate, age-appropriate versions of certain social media apps. Instead of “retrofitting the adult versions”,⁴⁹ platforms built specifically with children in mind may better serve their needs and priorities by minimising their exposure to inappropriate content and/or interactions and allowing them to participate in online life in accordance with their evolving capacities.⁵⁰ They also call for safeguards to restrict adult access to children-only spaces, similar to those in place to keep children out of adult platforms, to ensure that children and young people can frequent these online safe spaces without worry.⁵¹

⁴⁶ UNICEF (2026). *Children’s Best Interests in Digital Policy and Practice*. p35.
<https://www.unicef.org/innocenti/media/12841/file/UNICEF-Innocenti-Children's-Best-Interests-Digital-Policy-Practice-report-2026.pdf> [date accessed: 20.05.2026]

⁴⁷ Ibid. See p17.

⁴⁸ Ibid. See p18.

⁴⁹ Ibid. See p59.

⁵⁰ CRC/C/GC/25. Paras 19-20.

⁵¹ UNICEF (2026). *Children’s Best Interests in Digital Policy and Practice*. p60.
<https://www.unicef.org/innocenti/media/12841/file/UNICEF-Innocenti-Children's-Best-Interests-Digital-Policy-Practice-report-2026.pdf> [date accessed: 20.05.2026]

In addition to ‘safety by design’, creating digital spaces in collaboration with children and young people could be more conducive to ‘inclusivity by design’. For example, hearing-impaired young people in Portugal and Tanzania report major barriers in accessing online spaces, as they are often not designed with accessibility and inclusion in mind.⁵² Seeking input from children and young people of all demographics could ensure a more accessible digital environment that is more mindful of users that have additional needs, including features such as subtitles, alternative text, or sign language interpretations.

Data protection and privacy

“Companies get data leaks [...] No one feels comfortable with even like the huge big companies who have lots of money to create all these protections, people still don't feel comfortable giving them that information.”

— Darcey, age 15, supported by Project Rockit

Many children and young people express concerns that incessant requests by technology companies for their personal data and information, opaque data use and sharing policies, and a lack of privacy protections run counter to the aim of building an online environment that fulfils their best interests.⁵³ UK Government should work alongside children and young people, the parents and carers who seek to protect them, and companies to find solutions that achieve a healthy balance between privacy and safety, on the one hand, and excessive surveillance, on the other. Any measures implemented should be transparent, necessary, and proportionate.

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

Paragraph 12 of General Comment no. 25 states that any action taken by governments to support positive online spaces and content for children and young people must have their best interests at heart.⁵⁴ Therefore, as aforementioned, UK Government should conduct and publish a CRIA to assess the impact of the proposals on children’s rights, identifying any steps required in mitigation. It should take a comprehensive approach to this end, facilitating a dialogue not just with online platforms and technology companies, but also with children and young people, and the parents, carers, educators, and civil society organisations that work with and for them. In this vein, UK Government could also impose obligations upon technology providers to carry

⁵² Western Sydney University and 5rights Foundation (2021). *Our Rights in a Digital World*. p20.
<https://5rightsfoundation.com/wp-content/uploads/2024/09/OurRightsinaDigitalWorld-FullReport.pdf> [date accessed: 20.05.2026]

⁵³ Ibid. See p28. See also UNICEF (2026). *Children’s Best Interests in Digital Policy and Practice*. p21.
<https://www.unicef.org/innocenti/media/12841/file/UNICEF-Innocenti-Children's-Best-Interests-Digital-Policy-Practice-report-2026.pdf> [date accessed: 20.05.2026]

⁵⁴ CRC/C/GC/25. Para 12.

out their own child rights due diligence efforts in-house. Requiring companies to complete and publish their own CRIAs for any changes in their operations and/or terms and conditions may encourage more thorough consideration of and greater adherence to children's rights.

To lay the foundation for meaningful progress in the long term, UK Government must also put in place robust implementation, monitoring, and evaluation mechanisms to review the efficacy of policies seeking to facilitate positive online spaces and content for young people, making swift changes where measures fall short. In the meantime, it should take steps to enforce existing policies and regulations concerning online safety and fill legislative gaps where possible to minimise the detrimental impacts that harmful functionalities and practices may cause in the short term.

Chapter 5: Supporting Families

Parental controls

Question 61: How should this level of [parental] control [over the online experiences of their children] change for children of different ages? For example, a 16-year-old and an 11-year-old.

Article 5 of the UNCRC recognises the responsibilities, rights and duties of parents/carers to provide “appropriate direction and guidance consistent with the evolving capacities of the child.”⁵⁵ Paragraph 21 of General Comment no. 25 reaffirms this sentiment for the digital context, making clear that governments should raise awareness amongst parents and caregivers on the need to respect children's evolving autonomy, capacity, and privacy as they grow.⁵⁶ Caregivers should also be supported through this process, and encouraged to view children as active participants in shaping their online lives, rather than passive subjects. Early on, caregivers can work with children to agree clear boundaries and expectations around social media use, grounded in open, ongoing dialogue. Over time, this should evolve into a more collaborative and trust-based approach, where children are increasingly empowered to make informed decisions, exercise judgement, and take responsibility for their online engagement as their skills and confidence develop.⁵⁷

Children and young people generally appreciate such an approach. While they find authoritarian and privacy-invasive parental controls frustrating, they acknowledge that parental assistance can be helpful in developing healthy online habits and routines.⁵⁸ They also view a degree of parental supervision as necessary to shield younger children from harmful content and/or

⁵⁵ UN General Assembly, Convention on the Rights of the Child, United Nations, Treaty Series, vol. 1577, p. 3, 20 November 1989, <https://www.refworld.org/legal/agreements/unga/1989/en/18815>. See Article 5.

⁵⁶ CRC/C/GC/25. Para 21.

⁵⁷ Children's Commissioner (2025). *What I Wish My Parents or Carers Knew: A Guide for Parents and Carers on Managing Children's Digital Lives*. p6. <https://assets.childrenscommissioner.gov.uk/wpuploads/2025/12/cc-what-i-wish-parent-guide.pdf> [date accessed: 20.05.2026]

⁵⁸ UNICEF (2026). *Children's Best Interests in Digital Policy and Practice*. p18. <https://www.unicef.org/innocenti/media/12841/file/UNICEF-Innocenti-Children's-Best-Interests-Digital-Policy-Practice-report-2026.pdf> [date accessed: 20.05.2026]

interactions, while emphasising the need for older children to enjoy their own privacy.⁵⁹ Therefore, an approach characterised by “guidance with trust, not surveillance” and that is founded on dialogue, mutual respect, and freedom that increases with digital maturity is essential.⁶⁰

“Sometimes it’s annoying [parental controls], but it also feels good to have that sort of mediation, because I’ve seen how some people are because of social media.”

— Darcey, age 15, supported by Project Rockit

Dr Mariya Stoilova, postdoctoral researcher at the London School of Economics, points out that parents may feel more comfortable ceding control over their children’s online experiences if they deepen their knowledge of the platforms used and trends observed by children and young people today, as they will be more keenly aware of the potential opportunities and harms associated with such aspects of online life.⁶¹ Parents and carers should therefore be supported to acquire the necessary digital literacy skills and awareness of benefits and risks to secure maximum effect for children’s rights and respect their evolving capacities in the digital world.

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For further information, please contact **Christina Yuen, Policy Assistant**
Together (Scottish Alliance for Children's Rights)

Email: christina@togetherscotland.org.uk

Web: www.togetherscotland.org.uk BlueSky: [@together-sacr.bsky.social](https://bsky.app/profile/@together-sacr.bsky.social)

The Melting Pot, 15 Calton Road, Edinburgh, EH8 8DL

⁵⁹ Ibid. See p51.

⁶⁰ Ibid. See p18.

⁶¹ Stoilova, M; Bulger, M; Livingstone, S. (2023) 'Do parental control tools fulfil family expectations for child protection? A rapid evidence review of the contexts and outcomes of use.' *Journal of Children and Media*. 18(1). 29-49. See p40.