

## **Royal College of General Practitioners (RCGP) organisational response to the Department for Science, Innovation and Technology's Growing up in the online world: a national consultation**

May 2026

### **About RCGP**

We are the professional membership body for GPs in the UK. Our purpose is to encourage, foster and maintain the highest possible standards in general medical practice. We support GPs through all stages of their career, from medical students considering general practice, through to training, qualified years and retirement.

### **Growing up in the online world**

#### **Department for Science, Innovation and Technology (DSIT)**

##### **Summary**

The DSIT is consulting on further measures to prepare children for the future in an age of rapid technological change. This includes potential age restrictions on social media and other services such as gaming sites and AI chatbots, restrictions on addictive design features and risky functionalities, and better support for parents and families.

##### **Introduction**

The government is seeking views on its proposals to ensure children have enriching digital lives. This covers five core areas: understanding how children use technology; interventions for safer, more positive experiences; effective compliance and enforcement of online safety rules; preparing children for a digital future and enriching their online experiences; and supporting families.

### **Consultation questions**

#### **[RCGP responses are in blue]**

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

- **No X**
- Yes
- Prefer not to answer

**Where are you located?**

- In the UK X
- Outside the UK
- Prefer not to answer

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

(Please select 'Yes' or 'No')\*

Chapter 1: Understanding how children use technology (3 questions) Yes

Chapter 2: Interventions for safer, more positive experiences (approximately 28 questions) Yes

Chapter 3: Enforcement and compliance (approximately 13 questions) Yes

Chapter 4: Preparing children for a digital future (approximately 8 questions) Yes

Chapter 5: Supporting families (approximately 3 questions) Yes

## Chapter 1: Understanding how children use technology

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

The internet and digital technologies can offer important benefits for children and young people. These include access to educational resources, opportunities for creativity and self-expression, maintaining social connections, participation in communities of shared interest, and access to information and support. For some children and young people, particularly those with disabilities, chronic health conditions, or who feel socially isolated, online spaces may provide valuable opportunities for connection and belonging.

However, the benefits of being online are not evenly distributed and depend heavily on the nature, quality and context of digital engagement. While many potential benefits have been described, the evidence base remains mixed. Much of the research relies on self-reported measures and observational data, making it difficult to establish causal relationships or assess long-term developmental outcomes.

The view of the Royal College of General Practitioners (RCGP) is that the question is not simply whether children should be online, but how children can access the benefits of digital technologies while minimising exposure to preventable harms. This requires a greater focus on digital literacy, critical thinking, resilience and the ability to navigate online environments safely.

Preparing children for a digital future is important. However, future technological developments are difficult to predict, and digital competence should not be understood solely as proficiency with particular platforms or technologies. Skills such as critical thinking,

communication, creativity, resilience and media literacy are likely to remain important regardless of technological change.

Online platforms can help young people maintain existing friendships and connect with communities of shared interest. There may be particular benefits for some groups, including young people with chronic illness, disability or marginalised identities, who can find support and connection online. However, evidence suggests that these benefits are often context-dependent, and there is less evidence that social media leads to deeper or more meaningful social relationships. Much of the available evidence is observational rather than causal.

Some international evidence suggests that lower levels of social media use are associated with higher reported wellbeing and life satisfaction. Taken together, the evidence suggests that the relationship between technology use and wellbeing is complex. The benefits of digital engagement are likely to depend less on the amount of time spent online and more on the nature of the activity, the developmental stage of the child, and the safeguards surrounding its use.

The RCGP recognises that many online technologies provide important benefits for children and young people. The College's concern is not technology itself, but ensuring that digital environments are designed and regulated in ways that support healthy development and minimise preventable harms.

Hamm, M.P., Shulhan, J., Williams, G., et al. (2014). A systematic review of the use and effectiveness of social media in child health. *BMC Paediatrics* 14:138.

Gath, M.L., Horwood., Gillon., G. et al. (2025). Longitudinal associations between screen time and children's language, early educational skills and peer social functioning. *Developmental Psychology*. <https://dx.doi.org/10.1037/dev0001907>

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

The membership of the RCGP is diverse, with many GPs working as frontline clinicians, regularly in contact with children, young people and their families. As clinicians, we recognise children's digital exposure as a significant contributing factor in a range of adverse outcomes, including anxiety, low mood, self-harm, disordered eating, physical inactivity, obesity, sleep disturbance, attention difficulties, safeguarding concerns and school avoidance. With general practice often the first point of contact for worried parents, GPs and their teams are uniquely placed to observe the cumulative effects of digital harms over time. In a recent RCGP snapshot survey, 34% of respondents reported that, over the previous three months, they had seen on average multiple times per week a child or young person whose presentation they suspected was linked to screen and device exposure. Many of these harms appear to be associated with unrestricted, excessive or developmentally inappropriate use of smartphones and social media, although the strength and nature of these associations varies between outcomes.

A growing body of evidence links heavy social media use to poorer mental health outcomes. This association is particularly pronounced among girls and neurodivergent young people. For example, a multi-school study in England found that adolescents with problematic smartphone use were twice as likely to experience anxiety and three times as likely to

experience depression (Carter et al., 2024). Excessive screen time is also linked to poor sleep, low self-esteem, and body dissatisfaction – factors that contribute to worsening mental health. Some studies suggest stronger associations among girls and neurodivergent young people, although causality remains difficult to establish. For example, one study showed that girls using social media for five or more hours daily showed 50% higher depressive symptoms compared with 35% in boys (Kelly et al., 2018).

Online harms also include direct exploitation and abuse. Financial sextortion is an increasing threat, particularly affecting boys aged 14–18. Organised criminal groups use social media platforms to coerce victims into sharing explicit material and rapidly escalate to blackmail, often within a short timeframe (South Wales Police, 2024). The psychological impact on victims can be severe, including anxiety, depression, and, in some cases, suicide (Thorn, 2024). In addition, viral online challenges can promote risky or harmful behaviours; for instance, the ‘blackout challenge’ has been linked to unintentional deaths in the UK and internationally (Glasper, 2023).

More broadly, online platforms can normalise harmful behaviours and facilitate exposure to extreme or inappropriate content. This includes the spread of violent material, grooming, and pathways into exploitation or extremist networks. Evidence suggests that a significant proportion of young people encounter such content: 75% of UK 15-year-olds report having received a beheading video, often unsolicited (Children’s Commissioner, 2022; Youth Endowment Fund, 2024). While the relationship between online exposure and subsequent behaviour is complex, there are concerns that repeated exposure may influence attitudes, perceptions of risk and social norms, particularly among vulnerable young people.

Many of these risks are amplified by the design features of smartphones and social media platforms. These technologies are intentionally engineered to capture and retain attention through mechanisms such as infinite scrolling, algorithmic content delivery and frequent push notifications. Such features stimulate reward-seeking behaviours and habitual use (Westbrook et al., 2021). Children and adolescents are particularly vulnerable due to ongoing brain development, including an underdeveloped capacity for self-regulation and heightened emotional sensitivity (Sellman, 2024).

Digital harms should be understood within a broader social and developmental context. Children and young people with existing vulnerabilities may be more susceptible to adverse effects associated with online experiences.

### Summary of harms

**Mental health impacts** – associations with anxiety, depression, self-harm and suicidal ideation particularly among vulnerable groups.

**Safeguarding impacts** – facilitating cyberbullying, sextortion, online grooming, and exposure to violent and pornographic content.

**Youth crime and extremism** – platforms being increasingly used for grooming, radicalisation, violent content sharing. Social media may contribute to weapon carrying and criminal behaviours among adolescents.

**Academic impact** – increased distraction caused by smartphones, including peers' phone use associated with poorer concentration, distraction and reduced educational attainment.

**Sleep disruption** – increasing evidence of significant sleep disruption and emotional dysregulation.

**Brain development** – emerging evidence suggests possible effects on cognitive and executive functioning, although the long-term developmental significance remains uncertain.

**Social and communication skills** – excessive displacement of in-person interaction may affect opportunities for development of language, social skills, empathy and interpretation of non-verbal cues.

**Physical harms** – smartphones associated with reduced physical activity, sedentary behaviour, myopia, and musculoskeletal symptoms.

**Eating disorders and body image** – algorithmic amplification of appearance-related content may contribute to body dissatisfaction and disordered eating behaviours.

**Addiction and dependency** – increasing numbers of children and young people are developing problematic or compulsive patterns of device use, sometimes accompanied by distress when access is restricted.

Carter, B., Payne, M., Rees, P., et al. (2024) [A multi-school study in England, to assess problematic smartphone usage and anxiety and depression](https://pubmed.ncbi.nlm.nih.gov/39084660/). *Acta Paediatrica*. 113(10) pp. 2240-2248 <https://pubmed.ncbi.nlm.nih.gov/39084660/>

Kelly, Y. et al. (2018) 'Social Media Use and Adolescent Mental Health: Findings from the UK Millennium Cohort Study', *EClinicalMedicine*, 6. <https://doi.org/10.1016/j.eclinm.2018.12.005>

South Wales Police. (2024) '*Epidemic*' of sextortion cases targeting children sees National Crime Agency issue warning. <https://www.south-wales.police.uk/news/south-wales/news/2024/april/epidemic-of-sextortion-cases-targeting-children-sees-national-crime-agency-issue-warning/>

Thorn. (2024). *Trends in Financial Sextortion: An investigation of sextortion reports in NCMEC CyberTipline data*. <https://www.thorn.org/research/library/financial-sextortion/>

Glasper, E.A. (2023) 'Is Social Media Fuelling Deaths Among Children?', *Comprehensive Child and Adolescent Nursing*. <https://doi.org/10.1080/24694193.2023.2172291>

Children's Commissioner. (2022). *Digital Childhoods: a survey of children and parents*. <https://www.childrenscommissioner.gov.uk/resource/digital-childhoods-a-survey-of-children-and-parents/>

Youth Endowment Fund. (2024) *What role does social media play in violence affecting young people?* [https://youthendowmentfund.org.uk/wp-content/uploads/2024/11/CVV24\\_R2\\_Online.pdf](https://youthendowmentfund.org.uk/wp-content/uploads/2024/11/CVV24_R2_Online.pdf)

Children and Screens (2025). *Cyberbullying and Children - Children and Screens*.  
<https://www.childrenandscreens.org/learn-explore/research/cyberbullying-and-children/>

Westbrook, A. *et al.* (2021) 'Striatal dopamine synthesis capacity reflects smartphone social activity', *iScience*, 24(5). <https://doi.org/10.1016/j.isci.2021.102497>

Sellman, M. (2024, 14.10.2024) *TikTok can become addictive in less than 35 minutes, documents show*. The Times. <https://www.thetimes.com/uk/technology-uk/article/tiktok-app-addictive-minutes-mhmdwxf2f>

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

- Benefits strongly outweigh the risks
- Benefits somewhat outweigh the risks
- Benefits and risks are roughly equal
- **Risks somewhat outweigh the benefits X**
- Risks strongly outweigh the benefits
- 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.

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

- **Yes X**
- No
- Don't know/ Prefer not to answer

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”

- Strongly agree
- Somewhat agree
- **Neither agree nor disagree X**
- Somewhat disagree
- Strongly disagree
- Don't know/ Prefer not to answer

**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?**

- Yes - 13
- Yes - 14
- Yes - 15
- No - not lower than 16
- Don't know/ Prefer not to answer
- **Other (please specify):** The evidence supports stronger protections for children and young people online. Further evaluation is needed to determine the most appropriate minimum age threshold.

**What do you think the impacts would be of having a minimum age requirement 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.*

Adolescence is a time of profound neurodevelopmental reorganisation and change where reward systems (in the limbic system) start to develop earlier than the self-control systems of the prefrontal cortex. Hence adolescents are particularly sensitive to features which include peer approval, novelty, social feedback and emotional stimulation. The prefrontal cortex, which plays an important role in impulse control, decision-making, emotional regulation, risk evaluation and delayed gratification, continues to develop substantially throughout adolescence and into early adulthood.

At this stage of development, children are particularly susceptible to peer influence and less able to recognise or resist manipulation, which raises questions about the extent to which younger adolescents can fully understand and evaluate the risks associated with complex online environments and data practices. (Orben & Blakemore, 2023). Raising the minimum age for social media services above 13 may reduce exposure to potentially harmful online environments during a period of significant neurodevelopment and may provide additional time for development of self-regulation and critical evaluation skills.

Early reports from Australia suggest some parents have reported perceived benefits following implementation of age restrictions. However, longer-term independent evaluation will be needed to determine impacts on wellbeing, mental health, educational outcomes and unintended consequences.

Short-term experimental studies suggest reducing social media use may improve sleep and some wellbeing measures. However, the extent to which these findings translate into population-level age restrictions remains uncertain. (Sullivan et al., 2026).

A legal minimum age would help establish a clear societal norm and reduce pressure on individuals (e.g. parents and teachers) and organisations/systems (e.g. schools), particularly as many struggle to navigate complex safety controls and rapidly changing platforms.

Children and young people also often lack a clear understanding of how their data is collected, tracked and used to shape their online experiences. Awareness of issues such as privacy risks,

profiling and commercial exploitation is limited (Santer et al., 2023). This is especially true for younger children, who are still developing critical thinking and abstract reasoning skills, and may therefore be more likely to accept practices like digital tracking or sharing images with unfamiliar users (Gelman et al., 2018).

Potential unintended consequences, including migration to alternative platforms or circumvention of restrictions, should be considered and evaluated as part of any policy implementation.

It is often argued that vulnerable children need social media to find support and belonging. While online communities can provide valuable support and connection for some vulnerable children, evidence (and clinical experience) also suggests that these groups may face greater risks online, including exploitation, harmful content exposure, and targeting by predators. These are all real experiences that have been reported by RCGP members of their patients, and the prevalence of these risks is greater in children in social care.

A higher minimum age would not prevent access to moderated support networks or youth forums run by responsible organisations. On the contrary, it may encourage vulnerable children towards safer, more supportive online and offline environments with greater adult oversight and professional support.

Taken together, the evidence suggests there may be benefits to delaying unrestricted access to social media during childhood and early adolescence. However, evidence regarding the effectiveness of specific age thresholds remains limited, and any age-based restrictions should be accompanied by robust evaluation of their impact, implementation and potential unintended consequences. The RCGP supports consideration of stronger age-based protections and other evidence-informed measures as part of a broader package to improve children's online safety.

Orben, A. and Blakemore, S.J. (2023) 'How social media affects teen mental health: a missing link', *Nature*. <https://doi.org/10.1038/d41586-023-00402-9>

YouGov (2026). New YouGov research shows cautious optimism as Australians assess impact of under-16 social media ban. <https://yougov.com/articles/54334-new-yougov-research-shows-cautious-optimism-as-australians-assess-impact-of-under-16-social-media-ban>

Sullivan, E.C., Dubicka, B., Kirsop., H. & Henderson, LM. (2026). The longitudinal effects of social media on sleep among youth: A scoping review. *Computers in Human Behaviour Reports*. 21: 100908. [https://osf.io/preprints/psyarxiv/mg7vf\\_v3](https://osf.io/preprints/psyarxiv/mg7vf_v3)

Santer, N.D. et al. (2023) 'Early Adolescents' Perspectives on Digital Privacy', in *Algorithmic Rights and Protections for Children*. <https://doi.org/10.7551/mitpress/13654.003.0012>

Gelman, S.A. et al. (2018) 'Developing Digital Privacy: Children's Moral Judgments Concerning Mobile GPS Devices', *Child Development*, 89(1). <https://doi.org/10.1111/cdev.12826>

## 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.

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

- 13
- 14
- 15
- 16
- Don't know/ Prefer not to answer X
- Other (please specify):

**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.*

The consultation raises concerns about access to educational technology and the need for services to collect children's data. Educational tools should prioritise delivering educational content rather than relying on advertising, profiling, or extensive personal data collection practices that primarily benefit technology companies.

As health professionals, we take data security extremely seriously. There are important legal and ethical questions regarding children's capacity to consent to data use. Children and young people are often expected to agree to complex terms relating to data collection, profiling and targeted advertising, despite limited evidence that many fully understand how these systems operate in practice. We need to ask whether we can realistically assume that most 13–16-year-olds fully understand how their data is collected, shared, stored, and monetised – particularly when many adults struggle to understand these measures themselves. Raising the minimum age of digital consent may provide greater protection during a key developmental stage and could encourage companies to adopt more privacy-preserving approaches to services used by children and young people.

Any change to the age of digital consent would need careful consideration of implementation, accessibility and unintended consequences. It will be important to ensure that children and young people can continue to access educational, health and support services online, while receiving appropriate protections in relation to commercial data collection and profiling.

**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.*

Any age assurance measures should be proportionate, privacy-preserving and place responsibility on service providers rather than children and families. Consideration should also be given to the potential privacy implications of age verification technologies themselves.

*"There is a case for changing the digital age of consent for some online services but not others"*

- Strongly agree
- Somewhat agree
- Neither agree nor disagree
- Somewhat disagree
- Strongly disagree
- Don't know/ Prefer not to answer X

Please explain the reasoning behind your answer:

### 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.

Some online services allow their users to engage with the following functionalities. Do you think these functionalities should be age restricted so that children below a certain age cannot engage with them?

(Please select all that apply)

- Live streaming X
- Ability to send nude images or videos X
- Disappearing content X
- Location sharing X
- Connecting or talking to strangers X
- Don't know/ Prefer not to answer
- None of the above
- Other (please specify):

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

- Strongly agree X
- Somewhat agree

- Neither agree nor disagree
- Somewhat disagree
- Strongly disagree
- Don't know/ Prefer not to answer

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.*

Restricting access to high-risk functionalities is likely to reduce some important safeguarding risks. However, these measures should form part of a broader package including safer platform design, effective age assurance, digital literacy, parental support and robust enforcement.

### 'Addiction', compulsive design and displacement

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)

- Infinite scrolling X
- Autoplay X
- Affirmation features (e.g. 'likes', comments)
- Alerts and push notifications X
- Content recommendation algorithms (these are algorithms which provide personalised recommendations on a user's feed) X
- Don't know/ Prefer not to answer
- None of the above
- Other (please specify):

Which of these features do you think should be age restricted?

(Please select all that apply)

- Infinite scrolling X
- Autoplay X
- Affirmation features (e.g. 'likes', comments)
- Alerts and push notifications X
- Content recommendation algorithms (these are algorithms which provide personalised recommendations on a user's feed) X
- Don't know / Prefer not to answer
- None of the above – they should not be age restricted
- Other (please specify):

Would you support the following restrictions for children's access to online services?

- Daily screen time limits for individual apps
- Restricting overnight access for individual apps
- **Both – Daily screen time limits and overnight access for individual apps X**
- I would not support either of them
- Don't know/ Prefer not to answer

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

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

Many concerns regarding social media use arise not simply from the content children encounter, but from design features intended to maximise engagement and time spent on platforms. According to the OFCOM (2025) Online Nation Report, 'a significant amount of the time online spent by children is at night: across four of the main services used by children – YouTube, Snapchat, TikTok and WhatsApp – 15-24% of the time spent for the whole 8-14 age range is between 9pm and 5am and 4-10% of the time spent is late night (11pm-5am), depending on the platform.' Screen use – particularly smartphones, social media, and video games used at night – is consistently associated with shorter sleep duration, delayed bedtime, and poorer sleep quality across all age groups. A National Sleep Foundation consensus panel, reviewing 522 empirical articles and 35 experimental studies, achieved formal consensus that screen use causally impairs sleep health. If online platforms were required to introduce daily screen time limits and overnight restrictions for individual apps, this may help improve children's sleep, concentration during the day and overall wellbeing, particularly among heavier users. Such measures should be considered alongside broader efforts to promote safer-by-design digital environments.

OFCOM (2025) Children and Parents: Media Use and Attitudes Report

Hartstein LE, Mathew GM, Reichenberger DA, et al. (2024) The impact of screen use on sleep health across the lifespan: A National Sleep Foundation consensus statement. Sleep Health

**Which services should age restrictions apply to**

**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, the ability to generate non-text mediums such as video or images, the target age group, the size of the service.*

In determining whether services should be subject to age restrictions, consideration should be given to factors including user-to-user interaction, exposure to strangers, algorithmic content recommendation, persuasive design features, livestreaming functionality, private messaging, location sharing, the ability to generate or disseminate user-generated content, and the

likelihood of exposure to harmful or age-inappropriate material. Particular attention should be paid to services that combine several of these features.

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

Services that enable user-to-user interaction, unrestricted communication with strangers, algorithmically curated content feeds, livestreaming, disappearing content, or sharing of images and videos should be considered for enhanced age-based protections. This should include gaming platforms where social interaction, messaging, livestreaming or contact with unknown users forms a substantial part of the service.

Particular consideration should be given to AI systems that simulate social relationships, provide emotional support, retain personal information, or generate unrestricted conversational content. These systems may require enhanced safeguards, independent evaluation and age-appropriate protections for children and young people.

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

Restrictions should be proportionate to the level of risk associated with specific functionalities. Features such as direct messaging, stranger contact, livestreaming, location sharing, disappearing content and algorithmic recommendation systems may warrant additional protections where there is evidence that they increase safeguarding or wellbeing risks.

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

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

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.*

Educational technology services should not automatically be exempt from online safety requirements. While many educational platforms provide important benefits, children may still experience bullying, inappropriate content exposure, privacy concerns and other online harms through digital platforms used in educational settings.

Similarly, the existence of parental controls should not be used as a justification for exemption. Parental controls place much of the responsibility and burden on parents rather than on developers and service providers to design products that are safe by default. This approach may risk widening inequalities, as some vulnerable children are less likely to benefit from consistent parental oversight or effective use of technical controls. Reliance on parental controls alone may place a significant burden on families and can create challenges for parents who are expected to continuously monitor and manage children's online activity. Safety should primarily be addressed through stronger product design, age-appropriate standards, and platform accountability rather than expecting families to manage risks alone.

### **Artificial Intelligence (AI) chatbots**

An AI chatbot is an artificial intelligence system that can replicate human-like conversations with users. They can generate images, videos, text or audio in response to 'prompts' from users in real time. They may also remember context and personalise responses to individual users. These services can draw from a variety of datasets including live search results and large language models. AI chatbots can be standalone services or embedded within another service. Examples of this include ChatGPT (standalone) or embedded within services, such as Grok (within X).

#### **What are the benefits to children of using AI chatbots?**

*For example, this might include as a search function, for educational purposes, for creativity.*

AI chatbots may offer benefits for some children and young people, including support with learning, access to information, creativity, language development, revision, and problem-solving. Some children may find conversational interfaces more accessible than traditional search tools, particularly when seeking explanations or educational support.

However, evidence regarding the long-term developmental, educational and psychological impacts of AI chatbot use remains limited. Much of the available evidence relates to engagement and user experience rather than meaningful long-term outcomes.

Younger users may anthropomorphise chatbots, perceiving them as companions, confidants, or emotionally responsive 'friends'. However, AI systems can simulate empathy and understanding, but they do not possess genuine empathy, accountability or safeguarding responsibility. There is concern that vulnerable adolescents may develop dependency on AI systems for reassurance, emotional regulation or companionship, potentially displacing healthy human relationships and reducing opportunities to develop resilience and interpersonal skills.

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

- The realism of interactions, including realism of content generated X
- The personalisation of interactions X
- How they mimic relationships (friendship) X
- How they mimic relationships (romantic) X

- How they mimic empathy X
- Flattering language X
- Features to encourage more questions/ requests (e.g. asking questions back) X
- The ability to recall interactions across sessions X
- The type of content generated – a) video, b) text, c) audio, d) image X
- Allowing children to have accounts X
- Hallucination or false, misleading responses X
- Ability to engage in and generate mature content (e.g. sexual / romantic roleplay) X
- Don't know/ Prefer not to answer
- None of the above/AI chatbot features are not risky for children
- Other (please specify):

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

Should AI chatbots have minimum age restrictions?

- Yes – minimum age requirements for AI chatbots
- Yes – restrict access to certain features and functionalities
- Yes – both minimum age requirements and restricting access to certain features and functionalities
- No
- Don't know/ Prefer not to answer

Please explain the reasoning behind your answer:

There are substantial concerns regarding mental health and safeguarding. AI chatbots can generate inaccurate, inconsistent, or unsafe responses, particularly in complex psychological situations. Studies evaluating major AI systems have found that chatbots may fail to recognise signs of self-harm, suicidality, psychosis, or severe mental illness, and may not direct young people towards appropriate professional support. In some cases, AI chatbots have been reported to unintentionally reinforce harmful thoughts or provide unsafe advice.

From a developmental perspective, children and adolescents are less able than adults to critically evaluate AI-generated information or recognise the limitations of these systems. Conversational fluency may create a false perception of competence or trustworthiness. Younger users may be more likely to accept inaccurate information, disclose personal information without fully understanding privacy implications, or place undue reliance on AI generated guidance.

Educational concerns have been raised that excessive reliance on AI assistance could affect the development of independent thinking, problem-solving and deeper learning, although evidence remains limited.

UNESCO has warned that the rapid integration of generative AI into educational settings has occurred largely in the absence of sufficient safeguards, regulation or understanding of long-term developmental impacts.

Privacy and data protection represent an additional area of concern. Children may share highly sensitive personal, emotional, or behavioural information with AI systems without fully

understanding how such data may be stored, processed, or used commercially. This is of particular importance given children's limited capacity to provide informed consent regarding complex data practices.

Overall, reviews consistently emphasise the need for caution, regulation, age-appropriate safeguards and human oversight.

Given the current evidence base, a precautionary approach is justified. Enhanced safeguards, transparency requirements, independent evaluation and age-appropriate protections should be implemented for AI systems used by children and young people, particularly where systems simulate relationships, provide emotional support or retain personal information across interactions. Given the wide variation in the functionality and risk profile of AI systems, further evaluation is needed to determine whether minimum age requirements, functionality-based restrictions, or a combination of approaches is most appropriate.

**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.***

There is a growing body of expert analysis highlighting developmental, psychological, and safety concerns associated with children's use of AI chatbots, particularly those designed to simulate social interaction.

A central concern is that AI chatbots simulate human relationships without genuine understanding of empathy or accountability. Children may interpret these interactions as authentic and form emotional attachments to systems that are inherently artificial. Chatbot responses are often designed to be highly responsive and accommodating, and therefore may not expose children to the reciprocity, disagreement, and emotional complexity that are essential components of human relationships. Over time, there are concerns that frequent interaction with highly responsive AI systems could influence expectations of social interaction and relationships, although evidence regarding longer-term developmental impacts remains limited. .

As with other digital technologies, there is a potential for time spent interacting with AI systems to displace activities important for healthy cognitive and social development, including face-to-face communication, imaginative play and unstructured social interaction. These experiences play an important role in the development of language, empathy, resilience and executive cognitive function.

Emotional reliance is another concern. Children may increasingly use AI chatbots for reassurance, companionship, or emotional support. While this may appear beneficial in the short term, concerns have been raised that excessive reliance on AI systems for reassurance or companionship could affect the development of emotional regulation skills or reduce reliance on trusted adults and real-world support networks.

Privacy and data protection concerns need to be addressed. Children may disclose highly sensitive information to AI systems without understanding how data is stored, processed, or potentially used. Age assurance measures, while necessary enforcement, may also increase data collection risks.

There is currently limited evidence regarding the long-term developmental benefits or risks of AI chatbot use in children and young people. However, emerging evidence, case reports and expert concern highlight important safeguarding, psychological, developmental and privacy risks, particularly for systems that simulate social relationships or provide emotional support. Introducing age restrictions and restrictions on higher-risk functionalities may help reduce exposure to these risks during key stages of development. However, any regulatory approach should be proportionate, evidence-informed and subject to ongoing evaluation as the technology evolves.

A precautionary approach is therefore justified. Enhanced safeguards, transparency requirements, age-appropriate protections and independent oversight should be implemented for AI systems used by children and young people, particularly where systems simulate relationships, provide emotional support or retain personal information across interactions.

## Chapter 3: Enforcement and compliance

Chapter 3 covers questions related to the following topics:

- Age assurance
- Circumvention of age limits
- Mobile phones in schools

### 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).

To what extent do you agree or disagree with the following statement:

*“Adults should complete age checks more often, if it means children are safer online”*

- Strongly agree
- Somewhat agree X
- Neither agree nor disagree
- Somewhat disagree
- Strongly disagree
- Don't know/ Prefer not to answer X

The next few questions are more technical and you may not feel that these apply to you. If so, please skip to the next page.

**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.*

The responsibility for implementing and enforcing age-based protections should sit primarily with service providers rather than with parents and carers. If minimum age restrictions are introduced, some form of effective age assurance is likely to be necessary to ensure they are meaningful in practice.

Any age assurance measures should be proportionate, accurate and privacy-preserving, and should minimise unnecessary collection or retention of personal data. Different approaches may be appropriate in different contexts, but responsibility should remain with platforms to demonstrate compliance with age-based protections.

While implementation presents practical challenges, these should not prevent action to improve children's online safety. However, age assurance measures should be subject to ongoing evaluation to ensure they are effective, proportionate and do not create unintended barriers to access for legitimate educational, health or support services.

**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.*

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

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

Age assurance across a wider range of platforms may improve children's safety by helping to enforce age-based protections and reducing exposure to developmentally inappropriate content, harmful interactions and high-risk online environments. It may also reduce some of the burden currently placed on parents and carers to monitor and enforce platform age restrictions, while providing greater clarity regarding age-appropriate access.

However, wider use of age assurance may also create challenges relating to privacy, data protection, accessibility and implementation. Different age assurance approaches vary in their accuracy, intrusiveness and data requirements. Care should therefore be taken to ensure that systems are proportionate, privacy-preserving and minimise unnecessary collection, storage or sharing of personal information.

When assessing the effectiveness of age assurance technologies, consideration should be given not only to their accuracy, but also to their impact on privacy, inclusivity, accessibility, ease of use, potential for circumvention, and their ability to support meaningful age-based protections in practice. Ongoing independent evaluation will be important to ensure that age assurance measures remain effective, proportionate and do not create unintended barriers to access for legitimate educational, health or support services.

## 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.

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

**Which of the options below do you think the government should prioritise to reduce circumvention of online safety rules in the UK?**

(Please select the most important one to you)

- More education for children
- Restricting children's access to VPNs
- None of the above
- **Don't know/ Prefer not to answer X**
- Other (please specify):

**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"***

- Strongly agree
- Somewhat agree
- Neither agree nor disagree
- Somewhat disagree
- Strongly disagree
- **Don't know/ Prefer not to answer X**

**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.*

**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.*

Any approach should consider proportionality, privacy, accessibility, public trust and the potential for unintended consequences. The effectiveness of VPN restrictions in improving children's online safety should be balanced against legitimate uses of VPN technology and the privacy implications of additional age assurance requirements.

## Mobile phones in schools

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.

To what extent do you agree or disagree with the following statement:

***“To address some of the challenges schools face with mobile phones, the Department for Education’s (DfE) non-statutory guidance on ‘mobile phones in schools’ should be made statutory.” This would mean schools have a legal duty to follow the guidance, which explains to individual schools and trusts how to implement a policy that prohibits the use of mobile phones throughout the school day, unless they have good reasons not to. This includes during lessons, the time between lessons, breaktimes and lunchtime.***

- **Strongly agree X**
- Somewhat agree
- Neither agree nor disagree
- Somewhat disagree
- Strongly disagree
- Don't know/ Prefer not to answer

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.***

Studies show that smartphone restrictions in schools are associated with measurable gains in GCSE performance, particularly among previously low-attaining students. Importantly, these benefits are not accompanied by any evidence of decline in digital competence. Alongside academic improvements, such policies are frequently linked to better student focus, reduced cyberbullying and healthier patterns of social engagement and wellbeing.

Evidence consistently indicates that restricting smartphone use during the school day supports concentration, behaviour and overall learning outcomes. Stricter policies have also been associated with increased physical activity and more face-to-face interaction – both of which are known to benefit mental health and development. Notably, improvements in attainment are most pronounced among lower-achieving and disadvantaged pupils, while high-achieving students appear largely unaffected by restrictions (House of Commons Education Committee, 2024).

These findings align with international evidence. Several countries, including France, Finland, Italy and China, have introduced national restrictions on smartphone use in schools. While implementation and evaluation vary, the rationale for these policies is broadly consistent with evidence linking smartphone use during the school day with distraction, reduced concentration and poorer educational outcomes. UK schools adopting comparable approaches also report improved student focus and behaviour, reduced teacher workload related to discipline and pastoral care, increased in-person interaction, and lower levels of anxiety linked to reduced digital exposure.

Further insight is provided by the OECD's *Students, digital devices and success* (2024) report, which found that two-thirds of 15-year-olds are distracted by digital devices during maths lessons, with 60% of this disruption caused by peers. Analysis of PISA 2022 data suggests that such distraction is associated with a learning loss equivalent to three-quarters of a school year (OECD, 2023). More broadly, excessive screen time is linked to poorer academic performance and weaker social and emotional development.

There is little evidence to suggest that proportionate school-based restrictions hinder the development of digital literacy. There is growing consensus that combining sensible restrictions with high-quality digital education enables students to use technology more responsibly.

Making this guidance statutory would help standardise expectations across schools and provide greater clarity and consistency in implementation. Any statutory approach should retain flexibility for schools to make reasonable exceptions, including for medical needs, accessibility requirements and safeguarding considerations.

Importantly, restricting smartphone use during the school day is not equivalent to restricting access to digital technology altogether. Schools continue to play an important role in developing digital literacy and preparing pupils to use technology safely and responsibly.

While the College supports the health rationale for statutory guidance, decisions regarding implementation should continue to be informed by the expertise of educational professionals, school leaders and safeguarding teams.

House of Commons Education Committee (2024). *Screen time: impacts on education and wellbeing*. <https://committees.parliament.uk/publications/45128/documents/223543/default/>

OECD (2024). *Students, digital devices and success*

OECD (2023) *PISA 2022 Results (Volume I): The State of Learning and Equity in Education*, PISA, OECD Publishing, Paris. <https://doi.org/10.1787/53f23881-en>

**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)

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

- Other (please specify):

## Chapter 4: Preparing children for a digital future

Chapter 4 covers questions related to the following topics:

- Media and digital literacy for children / Media literacy – support for families
- Promoting high quality content

### Media and digital literacy for children / Media literacy – support for families

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. Which areas of media or digital literacy do children and families most need additional help with?

(Please select all that apply)

- Managing screen time and online habits X
- Spotting adverts, sponsored posts or AI generated content X
- Keeping personal information private X
- Online behaviour and experiences (bullying, respect, comparison or peer pressure ) X
- Checking if information is true X
- Understanding how social media works (for example, 'likes' or algorithms) X
- Staying safe online (including how to have conversations about online safety) X
- Reporting harmful or upsetting content X
- Knowing which apps or sites are right for their age X
- Don't know/ Prefer not to answer
- None of the above
- Other (please specify):

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)

- Schools or childcare settings X
- Community or youth spaces (for example libraries, youth clubs or local charities) X
- Parent or carer groups or networks X

- Public services (such as family hubs, GP surgeries or community centres) X
- Faith or cultural groups X
- Non-governmental online sources (such as websites, platforms or online communities) X
- Government websites X
- Don't know/ Prefer not to answer
- None of the above/I would not use these to find help
- Other (please specify):

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)

- By providing clear guidance that children can use on their own X
- By supporting parents and carers to support children online X
- By working with online platforms and services that children already use X
- By supporting youth organisations and community groups to help children online X
- By making help or advice easy to access when something goes wrong online X
- By involving children and young people in designing support X
- Don't know/ Prefer not to answer
- None of the above

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)

- Clear, simple information using plain language X
- Content adapted for different ages, abilities or needs X
- Visual, audio or interactive formats X
- Support delivered through trusted local or community services X
- Flexible or on-demand support that can be accessed when needed X
- Support that helps parents or carers guide children online X
- Don't know/ Prefer not to answer
- None of the above
- Other (please specify):

### 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.

Who would you trust to determine what is meant by 'high quality online content' for children 13-16?

(Please select all that apply)

- Government
- Online platform trust and safety teams
- Parents, carers or trusted adults
- Children
- Developmental experts
- Educators
- Youth workers
- Child advocacy charities and organisations
- Don't know/ Prefer not to answer X
- None of the above
- Other (please specify):

What further action should be prioritised to support positive online spaces for young people?

(Please select all that apply)

- Develop best practice principles for industry X
- Develop guidance for parents and carers X
- Develop guidance for children X
- Reviewing international approaches X
- Industry voluntarily promoting high quality content for children X
- Don't know/ Prefer not to answer
- None of the above
- Other (please specify):

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.*

Future guidance should be informed by children and young people themselves, alongside parents and carers, educators, health professionals, youth workers, safeguarding experts and researchers with expertise in child development and wellbeing.

## Chapter 5: Supporting families

Chapter 5 covers questions related to the following topic:

- 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.

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

- Strongly agree
- Somewhat agree X
- Neither agree nor disagree
- Somewhat disagree
- Strongly disagree
- Don't know/ Prefer not to answer

Please explain the reasoning behind your answer:

Parents and carers play an important role in supporting children to navigate online environments safely. However, responsibility for children's online safety should not rest primarily with families. Online services should be safe by design, with age-appropriate protections and regulatory safeguards in place, so that parents are not expected to manage risks through constant monitoring or complex technical controls.

How should this level of control change for children of different ages?

*For example, a 16-year-old and an 11-year-old.*

The level of parental oversight should evolve as children mature and develop greater independence. Younger children are likely to require more active supervision and stronger protections, while older adolescents should be supported to develop the skills and judgment needed to navigate online environments safely. Regardless of age, online services should be designed to be safe by default and should not rely on parents to manage risks through complex controls.

What would help parents and carers to more effectively use parental controls?

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

Parental controls should be simple, intuitive, clearly explained and consistent across platforms. Parents and carers would benefit from better information at the point of device purchase and clearer guidance from platforms about available safety settings. However, parental controls should complement, rather than replace, safer-by-design products and effective regulation. Responsibility for children's online safety should not rest solely with families, particularly as confidence, time and digital literacy vary considerably between households. Over-reliance on parental controls risks widening inequalities, as some families are less able to access or effectively use these tools.