



Government Consultation Response

Growing Up in the Online World: A National Consultation

*Professor Kath Woods-Townsend,
Esther Lash (age 15), Holly Tamlyn (age 17)
and Dr Nikhil Mistry*

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Written Response to DSIT Call for Evidence

LifeLab and the NxtGen Academy, University of Southampton

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Executive Summary

LifeLab is a science-for-health-literacy programme based at University Hospital Southampton and the University of Southampton. Operating across the educational lifecourse from primary school through college, LifeLab works with young people to build the knowledge, skills and critical awareness needed to make informed decisions about their health and wellbeing.

This response was produced in collaboration with young people through the NxtGen Academy, LifeLab's programme for young researchers aged 13 to 19. NxtGen researchers were involved not only as survey respondents but as active contributors to the analysis, and interpretation of the evidence presented here and are named authors of this submission.

Young people need to be involved in the discussions and currently don't feel that is the case. The reason that framing matters is made plain by the data. When asked whether their views are listened to when decisions are made about the internet and social media, **only 1 of the 44 young people who answered that question said that they definitely are. Thirty-one said their views are not really, or not at all, listened to.** One of the young Australian participants, reflecting on her experience of a social media ban already in operation since December 2025, commented:

"I so greatly appreciate you guys for coming to actual kids on this matter, because I know so many young people who disagree with this ban just because they've only taken the adult side." Young person, 14yrs

Policy Recommendations

LifeLab does not support a blanket social media ban for under-16s. The evidence from young people, including direct testimony from Australia where such a ban is already in force, points clearly to the conclusion that a blunt age restriction is

ineffective, inequitable, and may produce unintended harms that outweigh its intended benefits.

This position is grounded in four evidenced concerns:

The first is that **age-based bans can be easily circumvented**, as shown in Australia. Young people described facial recognition workarounds, shared family accounts, parental ID provided on behalf of children, and accounts on TikTok and Instagram that were never removed. One participant described accidentally clicking a banned app only to find it had reset and let her back in. Only 24% of survey respondents expected a higher age threshold would actually make young people safer online.

The second is that bans may **reduce platform accountability for child safety**, where platforms assume under-16s are no longer present, they have reduced incentive to maintain child safety features or moderate content for younger users. Young people who continue to access social media after a ban, which the evidence suggests is the majority, may be more exposed, not less. As one Australian participant put it: 'It's like the invisible boundaries that should be there, aren't.'

The third is that the **impact of the ban falls unevenly across young people**. Whether a young person accesses social media safely after a ban depends heavily on parental engagement and digital literacy - resources not equally distributed. The restriction may widen existing inequalities, with better-supported young people continuing to access platforms with guidance, while others face greater online risk or exclusion.

The fourth is that **removing access to mainstream platforms does not remove risk**; it may redirect young people to less regulated alternatives. Focus group participants noted that platforms such as Discord and Omegle were not captured by the Australian ban, yet were identified as carrying significant contact-based risks.

[This submission draws on different sources of evidence:](#)

- A survey completed by 62 young people aged 13 to 19 (mean age 16.2 years). The survey covered social media use patterns, emotional experiences, attitudes to regulation, and perceptions of AI chatbots. Of the 62 respondents, not all answered every question; the number who responded to each question is given where figures are cited.
- Qualitative interview/focus groups with Australian young people, aged 14yrs. A social media ban for under-16s has been in place in Australia since December 2025. These qualitative data were collected to gather the perspectives of young people reflecting directly on their lived experience of the ban.
- Respondents used a wide range of platforms. The most commonly used were WhatsApp (90%), Instagram (85%), Snapchat and YouTube (79%), and TikTok (63%). Only 1 respondent reported not using social media at all.

- Most respondents reported using social media after school; 57% using it between 3pm and 6pm, 59% using it between 6pm and 9pm, and 54% at weekends. Around a third (34%) reported using it late at night between 9pm and midnight, and a third (33%) before school. 13% reported using it during the day.
- The largest group reported spending 3 to 4 hours a day on social media (45%); 35% reported 1 to 2 hours, 10% less than an hour, and 10% 5 or more hours a day.

Note on sample: The survey sample is predominantly female (76%).

Summary of key messages from young people

The following reflects the consistent themes across survey and qualitative evidence gathered from young people in this consultation.

- Social media serves real social, educational, and community functions for young people. 92% survey respondents who answered the relevant question identified staying in touch with friends and family as a benefit. These functions are relevant context for any policy decision.
- Only 1 of the 44 who answered said their views are definitely listened to when decisions about social media are made; 31 said not really or not at all. Young people want to be consulted and to have their views reflected in policy.
- Young people are broadly aware of the risks associated with their own use of social media. The most commonly identified harm was spending too much time online (83% of respondents). Substantial proportions also identified concerns about their own mood, mental health, and relationship with content.
- Algorithmic design features, particularly endless scrolling, streaks, and personalised recommendations, were identified by large majorities of respondents as features designed to keep users online. Focus group participants consistently rated these as higher in frequency and long-term impact than risks from unknown contacts. Both matters warrant a policy response.
- Direct evidence from Australia indicates that a minimum age restriction of 16, as currently implemented, has been largely ineffective. Multiple circumvention routes are widely known and in some cases facilitated by parents.
- Where a restriction is not effectively enforced, the safety infrastructure that would otherwise apply to young people may be reduced on the assumption they are no longer present. Young people who continue to access platforms after a restriction may therefore be in a more exposed position than before it.
- The consequences of poorly enforced age restrictions are not evenly distributed. Young people with engaged, digitally literate parents who discuss online safety are better placed to navigate social media with awareness of its risks. Those without this background bear the costs of restriction without the benefits.

- Survey respondents expressed more support for feature-level restrictions (81%) than for a minimum age for signing up (46%). Young people draw meaningful distinctions between platforms and between specific features within platforms.
- Digital literacy education was identified across both the survey and qualitative interviews as a preferred intervention. Young people who had received education about online safety attributed their sense of safety online to that education, not to restrictions on access.

Detailed Response to Questions

Chapter 1: Understanding how children use technology

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

The most commonly cited benefit was **staying in touch with friends and family (91.5%)**. This was followed by entertainment (83%), finding out things that interest them (76%), learning new things (63%), and feeling part of a community (31%). 95% reported using social media mainly to communicate with people they already know, whether friends from school, family, or people from other communities they are part of. Only 5% reported any contact with people they knew only online.

Qualitative evidence reinforces this picture. One respondent (age 17) in an open-text response commented on the importance of social media for staying in touch and for relaxation, saying that without it there would be no way to message friends and family. Australian young people described social media as a means of sustaining friendships and family relationships across schools and countries, finding community around shared interests they could not easily access in person, and maintaining relationships that might otherwise lapse. One participant described being able to bond with people over the same things in ways that are not always possible in person, another described using social media to support social skill development alongside her dancing, and emphasised the value of YouTube as an educational resource, particularly as a dyslexic learner for whom video content supports her learning.

These stated benefits are reflected in how social media makes young people feel. 81% agreed or strongly agreed that social media helps them feel connected to others and 54% agreed or strongly agreed social media helped them feel included.

The communication function of social media is not incidental to young people's social lives: for many respondents it is central to them. Of the 61 who answered this question, 95% reported using social media to communicate with people they already know. Restricting access therefore raises a question that the data makes difficult to avoid: at what point does a measure intended to protect young people's wellbeing become a

source of harm to it? One respondent (age 17) put this directly, noting that without social media there would be no way to message friends and family, which is important, and that young people need something to relax with too.

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

The most commonly cited harm was **spending too much time online (83%)**. Other harms identified were: not being sure whether what they read is true or accurate (58%); feeling bad about themselves (52%); seeing upsetting or harmful content (51%); feeling left out or missing out (34%); and bullying or harassment (29%). 56% agreed or strongly agreed that social media sometimes makes them feel anxious and 48% agreed or strongly agreed that social media makes them worry about what others think.

Open-text responses and qualitative data gave these numbers some more context. One respondent (age 17) described social media as something that can feel inescapable and overwhelming. Another (age 17) described how seeing posts by people she knows makes her feel left out, insecure or stressed. One respondent (age 16) described a loss of authentic in-person connection, noting that friendships and conversations sometimes feel surface level. One respondent (age 15) identified eating disorder and self-harm content appearing in algorithmic feeds as a specific harm.

Qualitative evidence from Australia drew a distinction between the risk from harmful contact with unknown people and the risk from algorithmic design features that encourage compulsive use. When asked to rate these risks, focus group participants consistently rated the algorithmic risk as higher in frequency and long-term impact, while acknowledging that contact-based risks carry greater severity when they occur. Several participants described scrolling sessions of three to eight hours in a single sitting, which they attributed to deliberate platform design:

"These algorithms, the way these apps are designed, they're built to pull you in, to get your interest and build your whole scrolling platform. That's 100% an issue." Focus group participant (14yrs), Australia

Survey responses on design features support this. 87% identified endless scrolling as a feature designed to keep users online, 82% identified streaks, 69% notifications and alerts, 67% autoplay video, and 67% algorithmic recommendations.

3) Do the benefits outweigh the risks, or the other way around?

Among respondents, opinion was divided: 50% said good things strongly or somewhat outweigh the bad, 24% said bad things strongly or somewhat outweigh the good, and 26% described the balance as roughly equal.

Chapter 2: Interventions for safer, more positive experiences

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

Yes

5) **Please explain the reasoning behind your answers about minimum age requirements:**

With the caveat that the evidence from young people points toward 13 as a more appropriate threshold than 16, and that any minimum age restriction should sit alongside meaningful platform-level regulation to address the harms young people actually identify.

On the question of a minimum age of 16 specifically, opinion among the 59 survey respondents who answered this question was closely split: 46% leaned toward agreement and 44% leaned toward disagreement. When asked separately what minimum age they thought was appropriate, 63% who gave a specific age chose either 13 or 14, and only 19% chose 16. In the Australian focus group, the most common view was that 14 was a more appropriate threshold than 16. Young people pointed to the inconsistency of a policy that permits 16-year-olds to drive, work, and take on other significant responsibilities, while treating social media access as something they cannot yet be trusted with. As one participant put it: 'if we can get jobs at 14, why can't we have social media?'

Qualitative evidence from Australia provides important context about what a minimum age restriction looks like in practice. Across both the focus group and the individual interview, the consistent finding was that the ban had been largely ineffective. Young people described a wide range of ways they or their peers had continued to access social media: facial recognition workarounds, shared family accounts, parental identification provided on behalf of children, and accounts on platforms such as TikTok and Instagram that were never flagged despite belonging to under-16s. One participant described accidentally clicking on an app she had been banned from, only to find it had reset and allowed her back in. Several others described enforcement as more of a discouragement than an actual preventative measure.

Participants were not unsympathetic to the intent behind the ban. They drew a consistent distinction between the goal of making online spaces safer and the means chosen, arguing that the implementation had failed to achieve meaningful change while creating new problems.

6) **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.

The Australian evidence points to several unintended consequences.

The first concerns **young people who remain on platforms despite the restriction.**

Where platforms and regulators operate on the assumption that under-16s are no longer present, there is reduced incentive to maintain child safety features, moderate content with younger users in mind, or hold companies accountable for that age group's experiences. Young people who remain on those platforms, which the Australian evidence suggests will include a substantial proportion of those affected, may then be navigating the same content and risks with fewer of the safety provisions that their presence would otherwise have justified. One of the researchers at the focus group raised this directly, and the participants confirmed it from their own experience:

"All that does, in some ways, is actually make it less safe, because the tech companies and all the regulation think we don't need to worry about safety for under-16s because they're not on here. But actually, you're all still on there, and it's becoming a less safe place because those regulations aren't there for you." Researcher, Australian focus group

"It's like the invisible boundaries that should be there, but aren't." Focus group participant, female, 14yrs, Australia

The second concerns **the uneven distribution of the restriction's effects.** One of the stated aims of a minimum age restriction is to level the playing field for young people, particularly those from more disadvantaged backgrounds. The Australian evidence suggests the reality is considerably more complex. Whether a young person continues to access social media after a restriction, and whether they are supported to do so safely, depends heavily on parental engagement and digital literacy. But parental engagement does not map neatly onto protection. Some young people may have parents who help them get online without the knowledge or tools to help them navigate it safely. Others may have parents who enforce a strict ban, leaving them less experienced than their peers when they do eventually gain access. The restriction may therefore widen, rather than narrow, existing inequalities in young people's online safety, with those who are already better supported continuing to access social media in an informed way, and those with less support facing either greater risk online or greater exclusion from it.

The third concerns **displacement of risk.** Qualitative data described younger children engaging in other risky activities in the absence of social media access and suggested

the removal of one outlet may have led to substitution with others. Focus group participants also noted that platforms such as Omegle (and its successors) and Discord were not included in the Australian ban, despite being identified by participants as carrying significant risks, particularly around contact with unknown people. A restriction that covers some platforms but not others may simply redirect activity to those that are unregulated.

7) 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.

Of the 59 respondents who answered this question, **90% expected young people would try to get around the rules**. 58% expected young people would find new ways to talk to each other online, 49% expected displacement to other platforms with no age rules, and 36% expected it would become harder for young people to talk to trusted adults about worrying things they had seen online. **Only 24% expected that young people would actually be safer online as a result.**

"Young people will just find a way to evade this, e.g. using an older person's ID or evading AI algorithms, which in turn will make it harder to track their activity and keep them safe." Survey respondent, age 17

"It would be harder for parents and teachers to track online activity since young people would lie about their age." Survey respondent, age 15

Risks associated with raising the minimum age include:

- Young people who circumvent the restriction may do so without the safety provisions associated with legitimate account-holding, potentially increasing rather than decreasing their exposure to risk.
- Platforms may reduce investment in child safety features on the assumption that under-16s are no longer present, when the Australian evidence suggests they remain so in substantial numbers.
- Young people who rely on social media for educational, community, or personal support purposes may lose access to resources that matter to them.
- The burden of compliance falls on young people and families rather than on platforms or government, and parental engagement in supporting safe access is not equally distributed.
- Restrictions that do not distinguish between platforms with very different risk profiles may remove access to lower-risk services alongside higher-risk ones.

A further consequence identified in the qualitative evidence is that a restriction that young people circumvent, rather than comply with, may push their social media use underground. Where young people feel they need to hide their engagement with social media, they are less likely to seek help or talk to trusted adults when something goes wrong. This undermines one of the primary protective mechanisms available to young people: the ability to have open conversations about what they are experiencing online.

Finally, there is evidence that a restriction on established platforms may drive young people towards newer, less well-known alternatives that carry fewer protections and less adult awareness. The platforms young people currently use are, for the most part, known quantities: their risks are documented, their safety features are subject to scrutiny, and parents and educators are at least broadly familiar with them. A restriction that pushes young people off these platforms and onto less regulated alternatives may create a less safe environment, not a safer one. As one of the NxtGen researchers noted in their analysis: "is it not safer to keep them on the apps regulated and well known by adults, so that less can be gotten away with?"

8) 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.

The lived-experience from the young Australians is useful on this point. Age verification mechanisms that rely on self-declaration or facial recognition are readily circumvented. Young people described multiple workarounds: adjusting facial expressions to confuse age-estimation algorithms, using a parent's face or identification, sharing accounts registered under a parent's age, creating new accounts after removal, or accessing platforms without an account at all. Any approach that depends on a single point of verification at account creation is likely to be similarly vulnerable.

Effective implementation would require: age verification that is robust and genuinely difficult to circumvent, without disproportionately burdening young people or compromising privacy; continued investment in child safety features by platforms regardless of whether under-16s are formally permitted; and a parallel commitment to digital literacy education as a primary mechanism through which safety is delivered.

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

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

Survey respondents drew unprompted distinctions between platform types in their open text responses. One respondent (age 15) suggested messaging apps should have

a lower or no minimum age while other platforms should have stricter thresholds, noting that WhatsApp is mostly for communication with people you know. Another (age 17) made the same distinction: "WhatsApp I don't think should have a minimum age since it is mostly for communication with people you know, but for Instagram and TikTok, 13 to 15 seems reasonable." The Australian focus group reinforced this, with participants drawing a clear distinction between platforms they used primarily to communicate with friends, and content and algorithm-driven platforms they associated with the risks of excessive use and harmful content.

10) 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.

Survey respondents and Australian focus group participants both pointed to feature-level restrictions as more targeted and therefore more likely to address the harms young people actually identify. Restrictions on connecting with strangers, location sharing, and live streaming would address the contact-based risks young people described. Restrictions on algorithmic design features, particularly endless scrolling and personalised recommendations, would address what focus group participants identified as the most pervasive and difficult to resist risk. One respondent (age 17) called specifically for platforms to be required to offer versions without short-form video, arguing this would make them less habit-forming while preserving educational content.

11) 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.

Yes, restrictions and time limits would have a positive impact. Of the 54 who answered this question, 42 (78%) supported night-time restrictions and 34 (63%) supported daily screen time limits. Across all regulatory measures asked about, the most widely supported were: AI content labelling (45, 83%); restricting features for under-16s (44, 81%); advertising restrictions (43, 80%); night-time restrictions (42, 78%); and anti-misinformation rules (41, 76%).

Focus group participants in Australia discussed screen time tools as a mechanism that could have achieved some of the ban's intended goals without a blanket restriction. One participant, who had screen time limits set by a parent, described them as effective, while noting they can be bypassed where the password is accessible. The

evidence suggests that time-based restrictions, alongside feature-level restrictions, would be more proportionate and more likely to address the harms young people identify than a minimum age requirement alone.

12) 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.

The evidence from young people points to two factors as most important. The first is whether the service primarily enables communication with known contacts or exposes users to unknown contacts and algorithmically curated content. Young people drew this distinction themselves, unprompted, in their responses: messaging services were consistently treated differently from content platforms. The second is the presence of persuasive design features, particularly endless scrolling, algorithmic recommendations, streaks, and autoplay, which young people identified as the most pervasive and difficult to resist risk they face online. A service that combines unknown contact risk with persuasive design features warrants a higher threshold than one that does neither.

The Australian focus group evidence also points to the size and compliance culture of the service as a relevant factor. In practice, the largest platforms responded very differently to the Australian restriction. TikTok and Instagram largely did not enforce it. Snapchat introduced enforcement but then appeared to row back on it. YouTube did not require a registered account to access content, meaning the restriction had no practical effect on what young people could watch. A restriction that the largest platforms do not meaningfully implement will not achieve its intended purpose regardless of how it is framed in legislation. The willingness and technical capacity of platforms to enforce restrictions, and the existence of meaningful penalties if they do not, are therefore as important as the factors determining which services are in scope.

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

The evidence from young people points specifically to algorithmic content platforms, that is, platforms whose primary function is to serve personalised content feeds, as the category most warranting restriction. This includes platforms such as TikTok, Instagram and YouTube Shorts. Young people themselves identified these as distinct from messaging services, and focus group participants identified the algorithms on these platforms as the most pervasive and difficult to resist risk they face online.

The Australian focus group also specifically identified platforms enabling contact with unknown people, such as Discord and Omegle, as warranting capture. These were not included in the Australian ban, and participants noted this as a significant gap.

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

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

The evidence from young people suggests the most important factor is whether a feature is integral to the core communication function of the service or whether it is an addition that carries distinct risks. One focus group participant made this distinction directly in relation to Snapchat: the platform itself was valuable for communicating with friends, while the quick-add feature, which recommends unknown contacts, carried specific risks that could be addressed without removing access to the platform entirely.

On this basis, the factors that matter most are: whether the feature facilitates contact with unknown people; whether it generates or shares content that could be harmful, including nude images, live streaming, and location data; and whether it is a persuasive design feature whose primary purpose is to extend time on platform rather than to serve a communication or informational need.

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

Yes. The evidence from young people points clearly to the following features as warranting restriction across services: connecting or talking to strangers (80%); the ability to send nude images or videos (83%); location sharing (74%); live streaming (61%); endless scrolling (54%); and algorithmic content recommendations. These features appear across a wide range of platforms and the case for restricting them rests on the feature itself rather than the platform it appears on.

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.

16) 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.

The evidence from young people suggests that services whose primary purpose is educational or informational warrant careful consideration before restrictions are

applied. The individual interviewee described YouTube as an important educational resource, particularly as a dyslexic learner for whom video content supports learning in ways that text does not, and noted that teachers at her school used YouTube content directly in lessons. A blanket restriction that removes access to educational video content would have unintended consequences for young people's learning, particularly for those with additional learning needs.

The evidence also supports the position that messaging services used primarily for communication with known contacts, such as WhatsApp, should be treated differently from algorithmic content platforms. Several survey respondents argued explicitly that WhatsApp should carry no minimum age requirement, on the grounds that it functions as a communication tool rather than a content platform.

17) What are the benefits to children of using AI chatbots?

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

Of the 47 respondents who answered this question, the benefits identified were predominantly educational and functional: help with homework or learning topics (57%), finding answers quickly (45%), making learning fun (34%), and language learning (34%). A quarter (26%) said they saw no benefits to young people using AI chatbots at all.

18) 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:

Support for AI chatbot regulation was strong; 91% agreed or strongly agreed. 88% agreed or strongly agreed on minimum age limits for AI chatbots. Of those who expressed a view, only a small minority disagreed.

19) 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.

The evidence from young people suggests that age restrictions on AI chatbots would be broadly welcomed, with 88% of those who answered supporting minimum age limits and 91% supporting feature-level restrictions. The most significant concern raised by young people was not access to AI per se, but reliance on AI for emotional support. One respondent (age 18) described this as "overall, so dangerous for young people." Feature-level restrictions, particularly on chatbots that mimic friendship or romantic relationships, use flattering language, or recall previous interactions to simulate closeness, are likely to have a more meaningful protective effect than access restrictions alone, since they address the specific mechanisms young people identified as most concerning.

Chapter 3: Enforcement and compliance

20) 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 Australian evidence identifies the following as essential considerations. Verification at account creation alone is insufficient: it can be bypassed at that point and does not prevent subsequent account sharing. Methods relying on self-declaration or facial recognition are particularly vulnerable. Consistency of enforcement across platforms is critical: in Australia, TikTok and Instagram largely did not enforce the restriction, Snapchat began enforcement then appeared to row back, and YouTube required no account at all to access content. A restriction that the largest platforms do not meaningfully implement will not achieve its purpose regardless of how it is framed in legislation. The existence of meaningful penalties for non-compliance, applied consistently, is therefore as important as the technical design of any verification system.

Privacy implications also warrant careful consideration. The Australian experience showed that normalising the use of parental identification for age verification created new risks, including the sharing of identity documents by parents who were then also helping children circumvent restrictions.

21) 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.

Of the 31 survey respondents who answered this question, 71% said age checking would help keep them safer online. The qualitative evidence from Australia suggests the

picture is more complex in practice. Young people described widespread circumvention across all platforms that attempted verification. The impact of extending age assurance requirements depends entirely on whether they are genuinely enforced. Where they are not, the main impact may be to create a false sense that young people are protected, while reducing the incentive for platforms to maintain child safety features on the assumption that under-16s are no longer present.

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

The Australian evidence points to three requirements for more effective age assurance: verification must be genuinely difficult to circumvent rather than a single point of entry that can be bypassed through false information or shared devices; it must be consistent across all platforms in scope, since young people simply moved to platforms with weaker enforcement; and it must be accompanied by meaningful penalties for platforms that do not comply, since the perception among young people was that the largest platforms simply did not take the restriction seriously.

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

Based on the Australian evidence, the key considerations are: whether the technology can be defeated by simple user behaviour such as false date of birth entry, facial expression manipulation, or account sharing; whether it creates new vulnerabilities such as normalising the sharing of parental identification; whether it is consistently applied across sessions and devices rather than only at account creation; whether enforcement is consistent across platforms; and whether it addresses access via non-account routes such as logged-out browsing, which the Australian ban did not prevent.

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

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.

From the Australian focus group evidence, methods included: entering a false date of birth; adjusting facial expressions to confuse age-estimation algorithms; using a parent's or sibling's face or identification to pass verification; sharing an existing account registered under a parent's age; creating a new account after removal where platform-level enforcement was absent; and accessing platforms without an account, such as watching YouTube while logged out.

25) 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
- **Other (please specify):** engagement of tech companies – accountability. The survey evidence is clear: 90% of respondents expected young people would try to get around rules, and only 24% expected they would actually be safer as a result. The Australian focus group evidence shows that circumvention was widespread and largely unimpeded by platform-level enforcement. The primary lever for reducing circumvention is therefore accountability for platforms, not restrictions on young people or their access to tools such as VPNs.

26) 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

VPNs have legitimate uses for privacy, security, and access. A blanket age restriction on VPNs would affect all users and is unlikely to prevent determined circumvention, since young people in Australia described multiple workarounds that did not rely on VPNs at all.

27) What do you think the impacts would be if VPNs were age-restricted?

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

We do not have direct evidence from our data on VPN use specifically. We would note that the circumvention methods described by young people in Australia did not include VPNs, suggesting this is not the primary route by which young people access restricted

content. Age-restricting VPNs risks restricting legitimate privacy-protecting tools for all users while having limited effect on the young people it is intended to protect.

28) 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.

N/A

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.

29) 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.

As the academic authors of this submission, we would caution against making this guidance statutory. Schools are already best placed to understand their communities, their students, and their specific needs, and statutory guidance of this kind risks imposing a blanket solution on contexts that vary considerably. The evidence from our own data illustrates this: one participant described using YouTube as an essential learning tool as a dyslexic learner, in a way that text-based resources could not replicate. A statutory ban that does not adequately protect exemptions for educational use, or that is implemented inconsistently across schools, risks removing a tool that some young people depend on.

More broadly, we would argue that mobile phones are tools that could and should be used to support learning, not simply banned from it. At a time of significant financial pressure on schools, the devices young people carry in their pockets represent a resource that is being discarded rather than used. Schools that do find ways to integrate technology purposefully into learning are better preparing young people for their futures than those that simply prohibit it.

There is also an equity argument. If some young people have access to technology and education in how to use it safely and effectively, and others do not, the gap in their preparedness for adult and working life will widen. Schools have the potential to be the leveller here. Statutory guidance that treats mobile phones purely as a problem to be removed misses that opportunity entirely, and directs attention and resource away from where it is most needed: equipping young people, and the adults who support them, to navigate the online world safely and critically.

Chapter 4: Preparing children for a digital future

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

The submission selected all of the following: managing screen time and online habits; spotting adverts, sponsored posts or AI generated content; keeping personal information private; online behaviour and experiences; checking if information is true; understanding how social media works including algorithms; staying safe online; reporting harmful or upsetting content; and knowing which apps or sites are right for their age.

Survey respondents ranked nine areas of media and digital literacy in order of importance. The top priorities were: keeping personal information private; learning how to stay safe online and how to have conversations about online safety; knowing how to behave online; and checking whether information is true or false. Understanding how social media works, including how content is recommended and suggested, ranked lower, though it was still identified as an area where young people need support.

Qualitative evidence from Australia placed digital literacy education at the centre of proposed solutions. Multiple participants argued that comprehensive education would be more effective at addressing online risks than access restrictions. Several described having direct experience of the difference education makes. One participant had been required to prepare a persuasive argument for why she should be given access to social media before her parents agreed:

"I've been so heavily educated on this topic and I'm so aware of my surroundings on social media and in real life. I just think it's so, so important to have this education." Focus group participant, age 14, Australia"

Young people were also honest about the limitations of education delivered to teenagers in formal settings:

"When you run these courses and educate people on these topics, you've always got the issue that these are teenagers. It's not necessarily something they're interested in. I still think it's important because the message will get through to a few people, and that's better than nothing." Focus group participant, age 14, Australia

One participant argued for investment not only in preventive education but in support for young people who have already had poor online experiences:

"Strict rules can only go so far because they attempt to generalise a nuanced topic. Education is important, but because so many people won't listen, the only way a lot of people will learn is once it's happened to them. A lot of stuff needs to be done in helping people who've already had poor experiences." Focus group participant, age 14, Australia "

In England, equivalent provision to what participants described in Australia sits primarily within PSHE. PSHE is widely delivered inconsistently and without the same statutory accountability as other subjects, which limits both the depth and the perceived importance of this content to students. Improving digital literacy education through schools therefore requires not only content but a meaningful commitment to delivery and accountability.

Survey open-text responses reflected similar themes. One respondent (age 17) wrote that the online space can be good and useful when you're taught about it properly and taught how to use it safely, and that without that education and knowledge it becomes dangerous. Another (age 16) argued that tech companies should be held accountable and that young people should be taught online literacy, including how social media works and how to be less reliant on it. One respondent (age 17), who described receiving highly partisan political content in the run-up to local elections, argued that finding a way to make sure young people on social media are receiving age-appropriate content, and holding companies accountable to that standard, seemed more important than simply putting in an age limit.

31) Where would you like to see more support available?

The submission selected: schools or childcare settings; community or youth spaces; parent or carer groups or networks; and non-governmental online sources.

77% of those who answered this question felt their school or college had prepared them quite well or very well for being safe and healthy online, but over a third did not respond to this question at all. When asked where they would go for help if something happened to them online, 73% named a parent or carer, 57% named a friend, and 43% named a teacher, but at least a fifth said they would go to nobody at all. Schools are an important but insufficient venue for this kind of support. Focus group participants in Australia described formal educational programmes as reaching some young people but lacking the depth and practical specificity needed to address the full range of risks young people actually encounter.

32) How could the government better support young people to stay safe online?

The submission selected: by involving children and young people in designing support; by working with online platforms and services that children already use; by supporting

parents and carers to support children online; and by making help or advice easy to access when something goes wrong online.

Young people want to be involved in the design of responses, rather than having solutions imposed on them. Of the 44 who answered the relevant question, only 1 said their views are definitely listened to when decisions about social media are made. Twenty said not really, and 11 said not at all. Survey open-text responses included the following:

- We should let young people have a say in what they want, not what adults think they want.
- Most children know what is good and not so good, so in a moment of true sincerity, ask them.
- Including young people should be the most important thing, because if young people are not consulted they will just get around the rules.

Focus group participants in Australia described the restriction as having been designed around an adult characterisation of young people as passive consumers always doom scrolling, without engaging seriously with how young people themselves understand and experience social media. As one focus group participant put it:

"they've actually taken the wrong point of view of this whole social media ban. I think they're taking more of like the adult type of view... adults are like, oh, teenagers, screenagers, they're always on their phone, they're always doom scrolling away. And I'm like, have you ever actually thought of kids' side?" Focus group participant, age 14, Australia

33) Who should determine what is meant by high quality online content?

The submission selected: children; developmental experts; educators; and child advocacy charities and organisations. Government and online platform trust and safety teams were not selected.

34) What further action should be prioritised to support positive online spaces?

The submission selected: develop best practice principles for industry; develop guidance for parents and carers; develop guidance for children; and reviewing international approaches.

35) 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.

Young people's own evidence points to the importance of involving them in the design of any guidance or standards. Of the 44 who answered this question in our survey, only 1 said their views are definitely listened to when decisions about social media are made. The NxtGen researchers who contributed to this submission noted in their own analysis that much more backlash can be expected when decisions are made using arguments such as children aren't safe, while the evidence from young people themselves shows they largely disagree with the proposed solutions. Co-producing policy responses with young people is not simply good practice: it is likely to produce outcomes that young people will actually engage with. As one survey respondent (age 16) wrote, if young people are not consulted, they will just get around the rules.

36) What types of support would help children with additional needs?

The submission selected: content adapted for different ages, abilities or needs; visual, audio or interactive formats; support that helps parents or carers guide children online; clear, simple information using plain language; and flexible or on demand support that can be accessed when needed. This selection is supported by the evidence from the individual interviewee, who described YouTube as an important educational resource as a dyslexic learner, specifically because video and audio content supports her learning in ways that text does not.

Chapter 5: Supporting families

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.

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

"Parents should have control over the online experiences of their children"

Of the 44 survey respondents who answered this question, 57% leaned toward agreement. As the academic authors of this submission, we would note that parental engagement is not a straightforward protective factor. Parents vary enormously in their approach: some are highly restrictive, some are disengaged, some actively help their children circumvent rules they disagree with, and some are thoughtfully engaged in supporting their children to navigate the online world safely, which may itself include making informed decisions about which rules to follow and which to work around. A policy that relies primarily on parents to deliver online safety will be shaped by the full range of these approaches, and is unlikely to produce consistent outcomes across different family contexts.

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

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

The survey evidence points to young people themselves drawing distinctions by age. The mean preferred minimum age for social media among our respondents was 14.2 years, and several drew distinctions between types of platform, suggesting that parental control should be calibrated to both the age of the child and the nature of the platform rather than applied uniformly.

39) 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.

The evidence from the focus group points to knowledge as the primary need, rather than tools. Parents and carers who are poorly informed about what specific platforms are, how they work, and what the actual risks are, are not well placed to offer meaningful guidance or to apply controls effectively. Several focus group participants described peers whose parents had limited knowledge of the platforms their children used. Practical, accessible information about specific platforms, their design features, and the risks they carry, would be more useful than generic guidance about parental controls. Screen time tools were discussed in the focus group as effective in principle, with the caveat that their effectiveness depends on parental willingness to hold the line when young people push back, and on the tools themselves being genuinely difficult to bypass.

Authors

This response was co-produced with and by young people through the NxtGen Academy, LifeLab's programme for young researchers aged 13 to 19. NxtGen researchers receive training in research methods, ethics, and evidence synthesis, and are supported to participate as genuine research partners rather than as subjects or consultees. For this project, NxtGen researchers conducted qualitative interviews and focus groups, analysed the evidence, and contributed to the drafting of this submission. The project received full ethical approval through the University of Southampton.

Named authors: Professor Kath Woods-Townsend, Esther Lash (age 15), Holly Tamlyn (age 17), and Nikhil Mistry.

Corresponding author: Professor Kath Woods-Townsend, Professor of Science Engagement and Education, School of Healthcare Enterprise and Innovation, Faculty of Medicine, University of Southampton. k.woods-townsend@soton.ac.uk

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