

Children's Law Centre

RESPONSE

DEPARTMENT FOR SCIENCE, INNOVATION AND TECHNOLOGY'S CONSULTATION ON GROWING UP IN THE ONLINE WORLD

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- Member of Youth@CLC during focus group

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Introduction

The Children's Law Centre (CLC) is an independent charitable organisation in Northern Ireland (NI) which works towards a society where all children can participate, are valued, have their rights respected and guaranteed without discrimination and where every child can achieve their full potential.

Founded upon the principles enshrined in the United Nations Convention on the Rights of the Child (UNCRC), CLC leads for NI NGOs in co-ordinating the submission of evidence to the UN Committee on the Rights of the Child (CRC) to support and inform its periodic monitoring and reporting work on the UK's compliance with international children's rights standards.

Since establishment in 1997, CLC has provided free legal advice and information as well as strategic legal representation on a growing and increasingly complex range of issues affecting children. As a multi-disciplinary organisation, we offer training and research on children's rights, make submissions on law, policy and practice affecting children and provide a free legal advice, information and representation service. We have a dedicated free phone legal advice line for children, young people, their parents and carers as well as a Live Chat service for young people.

Our model of practice is very different to that provided by solicitors and legal practitioners working in private practice. Our expert legal advice, information and representation service is child-accessible and jurisdictionally unique in that regard. The service is free and accessible to children who contact us directly for legal advice and support. Our policy and advocacy work is informed by analysis of our casework, research and legal analysis, as well as children's lived experiences as communicated to us through Youth@CLC.

Youth@CLC are a group of 14–17-year-olds from across Northern Ireland who are committed to making children's rights a reality. They act as the youth advisory panel to the Children's Law Centre (CLC) and aim to make sure that all children and young people's voices are heard at local and national levels of decision-making. The work of Youth@CLC is underpinned by Article 12 of the United Nations Convention on the Right of the Child which states:

'You have the right to an opinion, for it to be listened to and to be taken seriously.'

The primary aim of Youth@CLC is to promote awareness of children's rights, with the ultimate goal being for every child and young person in Northern Ireland to be fully aware of their rights and the laws which affect them. To fulfil this, Youth@CLC engage in lobbying, consultation with government on policies relating to children and young people,

issue-based campaign work, and working with other groups of young people on children's rights issues.

This submission, developed in response to the Department for Science, Innovation and Technology's consultation on Growing Up in the Online World, begins by analysing the framing of technology policy issues as they relate to children and young people before exploring specific concerns that Youth@CLC identified as being crucial for the government to consider in addressing issues with the online world. Throughout the submission we have sought to provide an analysis which focuses on children's human rights and how they should be considered and applied in the context of the online world. Where possible, we have included direct quotes from members of Youth@CLC, whose views were obtained through curated focus groups and surveys, facilitated by youth participation and policy staff at CLC.

Re-Framing the Issue

CLC welcomes the opportunity to respond to the UK Government's open consultation on growing up in the online world. The consultation document rightly identifies many of the issues that young people face online, including being exposed to harmful content; experiencing inappropriate contact with people online; being victim to or participating in harmful behaviour; or being exploited by scams or wider commercial interests. The consultation document also acknowledges that while there are harms associated with being online, children derive substantial benefits from participation in the online world. This includes the ability to maintain friendships, access information, develop skills, and find community.

While the consultation document acknowledges both the positives and negatives of children's participation in the online world, CLC remains concerned that both the framing of the issue, as well as the proposed solutions - namely banning or restricting children's access to the online world in some capacity - do not adequately grapple with *all* aspects of children and young people's experiences online, nor does the consultation sufficiently contend with a wider analysis of prevailing narratives around children and social media, and how this may impact the pace and proportionality of the policy response.

Challenging the Binary Approach

Current debates around children's use of social media and the online world more generally are frequently characterised by a supposed tension between protection and participation. Proponents of bans, for example, insist on the need to safeguard children's emotional wellbeing and on the importance of equipping parents to better guide their children's online activities. Opponents of bans, on the other hand, argue that bans limit children's ability to exercise their full range of rights, including the ability to access information, connect with other young people, organise politically, and explore, learn, and play online.

These approaches to the issue in favour and against social media bans are part of a systematic binary approach to children's place in the online world, which is also reflected in the tone of the consultation document. The central question that runs through this debate is whether we should protect children online *or* empower them to freely explore the world around them. However, CLC would argue that these two things are not incompatible; children and young people should be able to access digital spaces *and* be safe while doing so. Rather than treating protection and participation as competing priorities, governments should develop policy that seeks to ensure that children and young people can safely participate in digital spaces while fully exercising their rights online.

Political Expediency, Speed and Proportionality

It is also important to situate current policy debates on children's social media and internet use within a broader political and cultural context, as this is having profound effects on shaping responses to children's use of digital technologies.

CLC is concerned that the current policy discussions on this issue are not only lacking a sufficiently nuanced analysis but are increasingly being shaped by political expediency and moral panic rather than proportionate, evidence-based policymaking. While there is understandable and legitimate momentum for governments across the world to respond to online harms affecting children and young people, the speed at which social media bans and restrictive measures are being proposed risks oversimplifying a highly complex issue. In focusing primarily on restricting access to digital spaces, these approaches fail to adequately grapple with the full range of issues shaping children and young people's online experiences, including the wider social, economic and structural factors that influence wellbeing.

As referenced, policymakers are increasingly over-relying on child protection narratives at the expense of other considerations, with the underlying assumption that shielding young people from difficult, objectionable, or harmful content is a necessary act of protection. This line of thought has been used through time in the likes of book-banning, abstinence-based or inadequate sex education, or anti-LGBTQIA+ policies. As has always been the case, these narratives desperately need to be counteracted and should not form the basis of policymaking.

Experts working at the intersection of technology and children's rights have also identified that the current discourse surrounding children's technology use has been significantly influenced by Jonathan Haidt's book *The Anxious Generation*, which argues that smartphones have created a mental health crisis in children and young people as they 'rewire' children's brains.¹ However, as has been widely pointed out by those in the field of adolescent psychology, Haidt is not an expert on child development or online harms, and the scientific community has refuted his book for its sensationalisation and reactionary undertones.² Importantly, broader research shows that the strongest influences on children and young people's mental wellbeing are not digital technologies, but wider structural issues such as access to services, inequality and poverty, rather than digital technologies alone.³

¹ Child Rights International Network, (2026). *Letting kids on social media is like sending them to Mars (and other bizarre analogies)*. Available at: <https://home.crin.org/the-big-debates/letting-kids-on-social-media-is-like-sending-them-to-mars-and-other-bizarre-analogies>

² Odgers, C.L. (2024). The great rewiring: is social media really behind an epidemic of teenage mental illness?, *Nature*, 628, pp.29-30. Available at: <https://www.nature.com/articles/d41586-024-00902-2#author-0>

³ O'Neill, S. (2026). Much more is needed to protect wellbeing of our children than banning social media, *Belfast Telegraph*, 30 January. Available at: <https://www.belfasttelegraph.co.uk/comment/opinion/much-more-is-needed-to-protect-wellbeing-of-our-children-than-banning-social-media/a/125457285.html>

This is not to suggest that use of digital technologies and social media are not having an impact on young people's wellbeing. Rather, CLC is concerned that current policy responses present an overwhelmingly negative and one-dimensional picture of young people's online lives. Research from Dynamic Interplay of Online Risk and Resilience in Adolescence (DIORA), for example, found that being online is actually seen as having just as many, if not more, positive effects than negative by young people.⁴ Despite this, increasingly restrictive policy responses continue to emerge internationally, often without sufficient consideration of proportionality, evidence, or unintended consequences for children's rights and participation.

In considering the growing international appetite for social media bans, it is crucial that the government takes into consideration the political and media environments through which such policies have emerged. Recent research from the University of Sydney, for example, found that support for Australia's social media ban was heavily influenced by sustained media coverage, high-profile publications such as Haidt's book, and parent-led advocacy campaigns that called for a ban.⁵ Researchers found that the behaviour of the media fit the criteria to be categorised as a moral panic. This reproduced certain constructions of childhood and ultimately supported government efforts to impose age-based restrictions on social media.⁶ In doing so, however, alternative policy approaches were constrained, particularly those that may have better accounted for the diversity of young people's experiences and maturity and offer ways to create safer online environments for everyone.⁷

CLC is also concerned that the current political focus on online safety is divorced from young people's wider lived realities, which risks distracting from the broader policy failures that significantly impact children's wellbeing. Persistent cuts to education, mental health services, youth provision and social care continue to shape young people's experiences and opportunities, yet these issues are receiving far less political attention than calls for social media bans.

Those shaping policy must therefore recognise that children and young people's online and offline lives are deeply interconnected and cannot be treated in isolation from each other. CLC therefore encourages the UK government to resist reactionary and politically expedient responses that frame restriction and exclusion as the primary solutions to online harm. Instead, adequate policy responses should be proportionate, evidence-

⁴ O'Neill, S. (2026). Much more is needed to protect wellbeing of our children than banning social media, *Belfast Telegraph*, 30 January. Available at: <https://www.belfasttelegraph.co.uk/comment/opinion/much-more-is-needed-to-protect-wellbeing-of-our-children-than-banning-social-media/a/125457285.html>

⁵ Humphry, J., Page Jeffery, C. and Hutchinson, J. (2025). The anxiety of age: Moral panics over children's social media use as a tool to regulate. *Convergence*. Available at: <https://journals.sagepub.com/doi/epub/10.1177/13548565261451511>

⁶ *Ibid.*

⁷ *Ibid.*

based, rights-respecting and grounded in the experiences and opinions of children and young people themselves.

Rights-Based Analysis

A helpful framework to assess the impact, effectiveness and appropriateness of social media bans and wider technology policy on children and the online environment is a children's rights-based approach. This requires policymakers to consider the full range of children's rights and recognise that no right exists in isolation or is inherently more important than another. Adopting this lens can help move policy discussions beyond moral panics and political expedient responses towards more evidence-based, proportionate and nuanced policymaking that addresses the root cause of harm facing children and young people online. In this regard, CLC is disappointed that the consultation makes no reference to children's rights or wider human rights obligations.

The UN Convention on the Rights of the Child (UNCRC), ratified by the UK in 1991, sets out the range of rights that all children have. Many of these rights apply equally in online and offline spaces, including the right to non-discrimination (Article 2), freedom of expression (Article 13), freedom of association (Article 15), privacy (Article 16), access to information (Article 17), protection from violence and abuse (Article 19), education (Article 28), and play, leisure and culture (Article 31).⁸ Crucially, these rights are universal, indivisible, and interdependent, meaning that efforts to protect one right should not undermine others.

This is reaffirmed by the UN Committee on the Rights of the Child's General Comment No.25 on children's rights in the digital environment, which makes clear that children should be protected from harm online while also being able to meaningfully access and participate in digital spaces.⁹ General Comment No. 25 emphasises that states should not take overly restrictive measures that disproportionately limit children's rights to participation, information, expression, education, and association.¹⁰ Instead, governments should focus on creating safer digital environments, improving digital literacy, ensuring platform accountability, and addressing structural inequalities that shape children's experiences online.¹¹ Critically, General Comment No.25 states the importance of involving children and young people in the development of legislation, policies, programmes, services and training in relation to the digital environment.¹²

A rights-based analysis therefore demonstrates that "ban-solutionism" (the assumption that restricting or banning access will resolve online harms) is unlikely to adequately

⁸ The United Nations Convention on the Rights of the Child (1989). Available at:

<https://www.ohchr.org/en/instruments-mechanisms/instruments/convention-rights-child>

⁹ United Nations Committee on the Rights of the Child. General Comments database. Available at:

<https://www.ohchr.org/en/treaty-bodies/crc/general-comments>

¹⁰ *Ibid.*

¹¹ *Ibid.*

¹² *Ibid.*

address the complexity of children's online experiences. Considering social media policy through the lens of children's rights and General Comment No. 25 will allow governments to achieve a more balanced and informed approach that seeks not simply to restrict children's access to digital spaces, but to ensure that children are able to participate in them safely, meaningfully, and without discrimination.

Designing Solutions with Children and Young People

Central to a rights-based analysis of social media and technology policy is ensuring that young people's voices and opinions are heard. Child rights and digital rights experts have repeatedly stated that the best approach to addressing the various crises that young people are experiencing, and which social media/use of digital technology *can* contribute to, is to **simply ask them**. Children are not docile, disempowered beings. As children's rights advocates, CLC supports and suggests policy solutions that place children and young people's views at the centre, in line with General Comment No.25.

In adopting a rights-based approach to technology policy, the UK Government should listen to what young people are communicating to them about their experiences of the online world. Only by ensuring both their participation as well as understanding and acting upon their lived realities of social media, can policies on this issue be successful. Article 12 of the UNCRC requires that children have the right to share their views and have those views given due weight in all matters affecting them.¹³ This is a cornerstone of the UNCRC and applies to all aspects of policy and all levels of decision-making.

The element of being given due weight is of critical importance. CLC welcomes that the government is open to hearing the views of children and young people and assert that this should not be a tick-box exercise. Members of Youth@CLC have raised the issue of adults ignoring their views in policymaking in previous work that they participated in around digital rights, facilitated by the UN Human Rights Office, 5Rights Foundation and Digital Futures for Children.¹⁴ In this, one member stated:

"There's a lot of hypocrisy on this. Young people have a better awareness of how much social media and online activity plays a role in real world activities. We understand the benefits and opportunities, and how much online stuff facilitates our real lives. It's so interchangeable at this stage and is such a big part of our lives. We need to learn to live with it and use it responsibly. And young people already do use it responsibly, and have the skills to do so, much more so than adults do. They just need to actually listen to us."

- Member of Youth@CLC during focus group

Unfortunately, any acknowledgement of children's views in relation to the online world is often paired with a hesitation as to whether children and young people are best placed to determine what would work best for them. This is the case even though children and young people are both active participants in online spaces and are often better equipped than the adults in their lives in understanding it. They are therefore the most in tune to the usefulness and appropriateness of proposed changes to technology policy.

¹³ The United Nations Convention on the Rights of the Child (1989). Available at: <https://www.ohchr.org/en/instruments-mechanisms/instruments/convention-rights-child>

¹⁴ Children's Law Centre, (2026). Young People's Voices: Youth@CLC's Participation in 'Our Digital World, Our Say'. Available at: <https://childrenslawcentre.org.uk/?mdocs-file=8772>

Therefore, for any proposed policies around children's online lives to be compliant with the UK Government's obligations under international human rights standards, children must not only be consulted, but the government must ensure that the requirements of meaningful engagement are met. This should include providing a designated audience to which children's views are able to influence policy and practice in a tangible way, and a genuine co-design model to ensure that those most impacted by policies are the ones directly feeding into it.¹⁵ With that, Youth@CLC's responses to the consultation questions are outlined below.

¹⁵ Lundy, L. (2004). 'Voice is not enough': Conceptualising Article 12 of the United Nations Convention on the Rights of the Child. *British Education Research Journal* 5, no. 2: 82-90.

Youth@CLC's Response to Consultation Questionnaire

Understanding Usage

In relation to understanding young people's usage of the digital environment, members of Youth@CLC outlined how the devices and digital products that they most frequently use included: phones, laptops, smart watches, interactive whiteboards, TVs, and iPads. They noted that their phones were mostly used for social media, while the likes of laptops and iPads were mostly for education/school. The apps that they used across these devices, and the ways in which they access the internet in their everyday lives included through the use of: TikTok, Instagram, WhatsApp, Chat GPT, BBC News/news apps, Snapchat, Duolingo, Microsoft Teams, Uber, Pinterest, Google, Facebook, YouTube, Google Classroom, and Spotify.

In discussing their usage, some members of Youth@CLC engaged in a conversation about adults' perceptions of their social media use, noting that they've seen conversations about restrictions to do with Facebook but that they themselves, as well as their friends, don't use it regularly:

"They think we're using Facebook so introduce things to try change our usage. But that just tells me how little they know. It's the same for individual apps across the board. They introduce restrictions on certain types of things, but we'll just find another app to do what's been restricted. They really don't know what's going on so why would I trust them to make policy on it?"

- Member of Youth@CLC during focus group

Most members of Youth@CLC, in discussing their usage, also raised the ways in which they independently manage social media usage and screen time. There was discussion of the use of free apps to lock them out of social media, as well as utilising functions such as setting time limits for apps and screen time more generally. While cognisant of the need to manage their time spent online, there was also discussion of where that responsibility should lie, with one member stating:

"I've gotten really strict with myself and only spend 30-60 minutes a day on my phone. But that responsibility has been put on me, and it really isn't that easy to do. I'm alright at it right now because I'm revising and have exams, so I've been able to really restrict it, but the way they're designed.... when I don't have much on it's really easy to go down a rabbit hole."

- Member of Youth@CLC during focus group

Friends, Support and Community

For Youth@CLC, there was overwhelming consensus that social media is an extremely beneficial tool in their ability to find friends, support and communities where they feel

like they belong. This was particularly raised in relation to their experiences living in Northern Ireland:

“Northern Ireland is a society where we’re still pretty divided. In some places it still feels very much like there are only two types of people and there’s a lack of diversity in a lot of areas. Like yes there can be overexposure on social media, but it’s also a place where people are more comfortable being themselves and you can find your niche more easily. Especially for young people from marginalised groups. Northern Ireland can be cliquey, everyone knows everyone, it’s hard to be authentically yourself, but online you can find spaces for you.”

- Member of Youth@CLC during focus group

Another member of Youth@CLC agreed, noting that social media is a useful tool to help young people find community, as well as facilitate meeting other people in real life. They discussed this in relation to finding out about youth groups, activities, and the fact that when social media acts as a creative outlet, people can come together and meet through that. Another member added that social media is useful for staying in contact with people who they have met but don’t necessarily see on a regular basis, including family and friends who do not live nearby.

Positives vs. Negatives

In discussing the positives and negatives about being on social media, members of Youth@CLC reiterated the importance of social media for general communication and connection. There was also wide consensus that social media is important for access to information and awareness of both local and global issues. There was discussion of the fact that while they engage with mainstream news to an extent, they mostly get their information from following independent journalists, different campaigning groups, and news-based influencers.

With regards to the negative aspects of social media, members of Youth@CLC raised the spread of false information and the influence of algorithms as a problem, with several of the young people describing social media as creating an “echo chamber” where users only see one side of issues. Many members also raised the fact that social media can sometimes feel like a waste of time as it acts as something that takes them away from real life. Related to this, there was some conversation about the rise of “brain rot” content, and how this adds to the feeling of social media being a time waster. Finally, members of Youth@CLC discussed the risk of bullying and harassment online.

Many of the members of Youth@CLC also presented the case for nuance around describing the positives and negatives of social media use, describing the fact that many of the positives can also be interpreted as negatives and vice versa. For example, one member stated that while it can be an important resource and tool for information, navigating mis/disinformation can be difficult. Similarly, another member stressed that

while social media can worsen some young people's mental health, there is also an increasing number of people that discuss their journeys with mental health issues online and spread both resources and awareness on issues that young people may not receive elsewhere.

Members of Youth@CLC were keen to assert that the positives and negatives of social media use are intertwined with one another and are not easily separated. They also stressed that many of the negatives associated with social media can be attributed to algorithms that are designed to be addictive as well as an overall lack of control and agency over their own social media accounts. Generally, when young people feel in control of their use - including both time spent using social media and content - their experiences were more positive online. It was only when unwanted intrusion into their online space occurred and/or they were presented with content that they did not want to see, did they describe the negative experiences of social media.

Further, while cognisant of the full range of positive and negative experiences online, members of Youth@CLC stressed that the online world is not a fundamentally negative space for them. However, they expressed that many adults in their lives have an overwhelmingly negative perception of their social media use, which one member of Youth@CLC was eager to counter:

"They think socials are only a bad thing. There are so many sensationalised headlines that have too-negative an opinion on social media and adults only think about them. They don't consider that it can be a good thing for us, and if you take that away you're taking away my access to so many things, including my friends, information, and opportunities".

- Member of Youth@CLC during focus group

Social Media Ban for U16s

The largest portion of the discussion with Youth@CLC centered around the question of whether they agreed with a social media ban for under 16s. **Every young person that participated in the focus groups and surveys were adamant that a social media ban is not an appropriate policy response.** One member stated:

"If they ban it, and then you're suddenly exposed to social media at 16, you'll have no idea how to responsibly use it and it will be catastrophic. You won't know how to deal with misinformation, how to regulate your use, how to manage all the issues. It's just a lazy suggestion 'cause they want to look like they're doing something."

- Member of Youth@CLC during focus group

Similarly, another member of Youth@CLC added:

“I would not support a ban. Young people are being punished for adults’ actions. It assumes that on the day before you turn 16 you do not have the tools to navigate the online world but the day after you are fully equipped to navigate it.”

- Member of Youth@CLC in survey response

Another member of Youth@CLC further outlined the arbitrary nature of choosing 16 as the age, and problematised the overall issue of selecting an age:

“Picking an age that works for every child or young person won’t work. Everyone’s life experience and development is different. And the same things that could potentially harm a 14-year-old, are the same for a 16-year-old, an 18-year-old and older adults. They’ll all be impacted anyway. So, I don’t understand why they don’t try to make platforms safer for everyone overall rather than trying to introduce bans.”

- Member of Youth@CLC during focus group

Further, a member of Youth@CLC also raised the issue of young people circumventing the ban if it were to take effect:

“It wouldn’t work so it’s pointless. We know from Australia. Young people will either find a way around it and get on social media regardless. Or we’ll be pushed into darker corners of the internet, ending up on less-regulated and more dangerous sites and platforms. This would completely contradict the whole aim of a ban, which is why bans don’t make sense.”

- Member of Youth@CLC during focus group

Finally, a member of Youth@CLC noted their concern that banning social media would cut young people off from necessary resources, information, and connections:

“I’d be worried about what a ban would do for young people’s overall wellbeing. Particularly marginalised young people who don’t have a lot of support. Banning social media for them would cut them off from resources and community that could help them.”

- Member of Youth@CLC during focus group

In addition to the focus group for this particular consultation, when Youth@CLC participated in workshops on digital rights for the UN Human Rights Office, the topic of social media bans was also raised. In this, many members of Youth@CLC similarly stated that they don't think blanket bans are a good idea because young people need access to information, including things like rehab forums, access to information about relationship and sexuality education, abortion, healthcare, and places to seek support. They noted that labelling sites like this as ‘adult content’ and banning young people from viewing them was problematic and wrong. One member also outlined their worry about governments blocking the news from young people:

"We need real access to information about the likes of what is happening in Gaza, even if that content is horrible. It's so horrific that it's being labelled as inappropriate, but governments are using that as a reason to not show us when we have a right to see what is happening".

- Member of Youth@CLC during digital rights workshop

In summarising many of the issues raised above, one member of Youth@CLC stressed:

"If you're cut off from access to the internet, you're not being respected or trusted. Young people will always find a way around this and adults just need to have genuine conversations with us and trust us. We'll always find our way around a system that tries to block us off."

- Member of Youth@CLC during digital rights workshop

Social Media Features

After establishing that they do not support a social media ban for under 16s, the topic of conversation turned to whether specific functionalities of social media should be restricted to different age groups. The features outlined in the survey included: disappearing content; live streaming; location sharing; connecting or talking to strangers; and the ability to send nude images or video. Most members of Youth@CLC did not think that these features should be blocked for under 16s, with many of them stating that some of them are positive and useful features, while blocking others would not address the root cause of some of the harms.

Many of the girls participating in the focus group, in particular, outlined the importance of location sharing as a safety feature. Further, the most substantial discussion in relation to these features centred around the ability to send and receive nude images or videos. While Youth@CLC acknowledged efforts to blur sensitive content, they questioned the overall value of enabling and sharing this type of imagery online. Crucially, the discussion was not focussed on age limits. Rather, Youth@CLC broadened the conversation to consider consent and exposure more generally, arguing that *no one* should be confronted with nude content online without actively choosing to view it. Members emphasised that stronger consent-based controls were needed to ensure people are not exposed to explicit imagery unintentionally or against their wishes:

"On the nude images thing, I'm not sure why it's specifying just young people. This feels like it's an everyone problem. Things would feel safer if no one was really allowed to send nude content online, or at least if it was restricted so that you can only access it if you really consent to it."

- Member of Youth@CLC during focus group

Another member stressed:

“Banning under 16s from using these features wouldn’t stop the dangers of being online. I would suggest potentially stopping the quick add function and making sure that if you want to add someone online you would both have to add your username in.”

- Member of Youth@CLC in survey response

As identified in this suggestion, the underlying logic behind many members’ of Youth@CLC’s positions was that age restrictions on these features are not necessary, as long as young people are able to be intentional and have agency and choice over the settings and features that they use. The main takeaway for Youth@CLC was that if they had more control over their social media, they would feel more confident and safer online, with one member summarising:

“It’s less about age and more about the ability to self-select. I should always have the ability to choose what I want to engage with. When I lose the choice is when it starts to feel unsafe.”

- Member of Youth@CLC during focus group

In response to the consultation questions around design features, Youth@CLC were generally supportive of adjusting platforms in order to make them less addictive. The ability to endlessly scroll was raised as something that could be limited. However, again, Youth@CLC noted that the ability to do so is not solely harmful to children, and that the addictive design of platforms can have negative impacts on *all* users. A lot of scepticism was also expressed around the likeliness of tech companies making platforms safer by design. At present, many of the young people described how they put a lot of personal responsibility on themselves to control their social media use because:

“We know that the people who are in charge and who run social media companies don’t care. They are going to put things in place that nod to making an effort in making platforms less problematic, but their bottom line is that they want to make profit and they do that by making platforms addictive. I put the responsibility on myself because they don’t care.”

- Member of Youth@CLC during focus group

Again, when exploring the issue of features of social media, Youth@CLC did not view blanket bans on specific features as a reasonable solution. Instead, they emphasised the importance of autonomy, informed choice and platform design that enables users to control their online experiences.

AI Chatbots

Members of Youth@CLC initially expressed mixed and often cautious views about AI chatbots. While many members views AI as more unpredictable and potentially more dangerous than social media due to how new and rapidly developing it is, the discussion ultimately arrived at a similar conclusion to their views on social media use: there are

both positives and negatives to AI chatbot use, and the key policy question should not simply be whether children and young people should be allowed access to AI, but how this can be properly supported, educated and protected while using it.

Some members of Youth@CLC initially expressed concern about children interacting with AI chatbots at all. Some felt that AI presents unique risks compared with social media because harmful content can be generated so easily, including deepfakes and revenge porn. Others raised concerns about emotional dependence on AI systems and the ability for young people to seek companionship or emotional support through AI chatbots.

At the same time, many members also acknowledged the educational and practical benefits of using AI systems, particularly when used appropriately and with well-informed tactics. Several members of Youth@CLC described using AI to simplify complex information, support research and assist with revision or idea generation. One member explained:

“When I’m reading academic papers or if I come across something that I’m finding hard to understand, I ask AI to simplify it. I’ve used it for research as well as ask it to point me in the direction of sources. It makes things way more efficient. I generally think it can be used as a good tool if you’re aware of the risks.”

- Member of Youth@CLC during focus group

As discussion progressed on this topic, members of Youth@CLC increasingly emphasised that concerns around AI cannot be separated from the broader social realities that children and young people are facing. Rather than viewing emotional reliance on AI solely as a technological issue, members of Youth@CLC raised the fact that some children and young people’s AI use patterns reflect on wider experiences of exclusion, loneliness and lack of support. One member added:

“Young people are being excluded from a lot of spaces both politically and socially right now. I can see why they’re being pushed towards AI companionship instead of connecting with people in real life.”

- Member of Youth@CLC during focus group

This also led members of Youth@CLC to connect discussions around AI to wider debates about social media bans and restricting young people’s online participation more generally. Another member reflected:

“This also kind of links in with the social media ban question. Cause now I’m thinking about if social media was banned, young people would have even less places to turn to and would be more likely to turn to AI.”

- Member of Youth@CLC during focus group

Members of Youth@CLC repeatedly stressed that blanket bans or highly restrictive approaches would not address the root causes of these issues and would likely push young people towards workarounds rather than engaging in safer, more informed behaviours. One member of Youth@CLC therefore argued that education, media literacy and safer platform design were more effective and proportionate responses:

“It’s a similar debate. Rather than being prevented from accessing it and imposing a blanket ban, we should be taught how to use it properly, what the risks and benefits are. If there’s a blanket ban people will just find a workaround.”

- Member of Youth@CLC during focus group

Overall, members of Youth@CLC felt that the responsibility for safe AI use should not rest solely on children and young people themselves. Instead, they argued that policymakers and technology companies must ensure that AI systems are designed safely and that young people are equipped with the knowledge, support and resources needed to navigate emerging technologies responsibly. As one member concluded:

“AI should be provided in a way that suits us. It’s not young people’s responsibility to ensure AI is safe for us to use. But it does need to be.”

- Member of Youth@CLC in survey response

Phone Bans in Schools

One member of Youth@CLC outlined their school having a system where phones must be locked in a pouch for the duration of the school day. They raised a number of issues with this, namely that students have learnt how to unlock the pouches and that they have had to start bringing in other devices such as iPads or laptops for certain subjects when previously they could have used their phone. They noted that the pouches were therefore a waste of money and also place an unnecessary pressure on students to have access to multiple types of devices. Overall, this member stated:

“I think it’s a waste of time. We’ve all figured out a way to get round it, we need to use our phones sometimes, and using photos, videos, the internet, social media... it’s all become a necessary part of education. So, unless they figure out a way to make school completely tech free, then it doesn’t make sense to ban phones outright.”

- Member of Youth@CLC during focus group

Other members of Youth@CLC who do not currently have a phone ban stated that while prohibiting phone use during lessons is appropriate, an outright ban on phones in schools is a disproportionate and unnecessary response. Much like the discussions on social media and AI chatbots, members of Youth@CLC stated that phone bans in school do not get to the root cause of the problem that policymakers are attempting to address. They also similarly noted that children and young people will find a way around it, thus

the investment in phone pouches or wider infrastructure to impose a ban would end up being a waste of time and money.

Media Literacy

Members of Youth@CLC were overwhelmingly in agreement that not enough is taught in school about media literacy. They stressed that there is real potential, in the likes of the Learning for Life and Work (LLW) curriculum, to be taught things such as how to: use AI responsibly; regulate their social media use; and seek and form opinions in a complex information environment. One member noted:

“We can’t ignore AI and social media and hope that it goes away. It’s here and we need to be given guidance. Not in a way that is fearmongering or uncritical. It has to be a space where young people feel empowered to have difficult conversations and not be scared to ask questions.”

- Member of Youth@CLC during focus group

One member of Youth@CLC added that while they agree with the need for better access to media literacy information, they were concerned that teachers, and adults more generally, are not well-equipped to deliver content on this topic:

“I don’t actually think most of the adults I know are well-informed enough to have these conversations. Young people usually know more, or at least approach it in a way that is more nuanced. If we’re going to improve our media literacy then young people’s voices should be at least equal, or even carry more weight, in guiding the conversation and learning.”

- Member of Youth@CLC during focus group

Policymakers and Trust

Relatedly to the above point, when asked who they would trust to determine what is good, safe or positive online content for children, as well as who they would trust to develop policy on this issue, members of Youth@CLC overwhelmingly stated the need to meaningfully consult children and young people:

“They have to listen to young people. So many of the people making these policies grew up in a world where social media didn’t exist and they’ve never experienced social media through a child’s lens, yet they have all this power to make decisions on something they don’t know anything about. Many of them have a weird notion of what childhood is supposed to be like but each child’s experience is so different, and social media has such a range of impacts on young people that they just aren’t understanding. These people won’t see a ban, so they need to actually talk to young people.”

- Member of Youth@CLC during focus group

Another member added:

“I’d trust young people, people in their 20s. They were the first generation to grow up with social media and now they’re adults who understand the experience. They’re the ones who really get what the impact of social media can be.”

- Member of Youth@CLC in survey response

Members of Youth@CLC also highlighted the important role of those who work closely with children and young people on a regular basis, and who hold specific expertise on this topic, including psychologists, youth workers, and policy analysts. They were overall distrusting of people who lacked lived experience or specific subject-area expertise.

Recommendations

CLC's analysis of the issues explored in this consultation, further enriched and informed by the direct input of young people through Youth@CLC, has led us to propose the following recommendations to the UK Government:

- **Adopt a children's rights-based approach to technology policy:** All technology and online safety legislation should be grounded in the UNCRC and should incorporate the principles outlined in General Comment No.25 on children's rights in the digital environment. This will ensure that protection and participation are not framed as competing priorities, and that measures intended to protect children do not disproportionately restrict other rights.
- **Reject blanket social media bans for under 16s:** The UK Government should avoid pursuing blanket bans and broad age-based restrictions that limit children and young people's participation in digital spaces.
- **Co-design policy with young people:** In line with Article 12 of the UNCRC, children and young people should be involved in the design, development, implementation and evaluation of digital policy. Consultations should not be a "tick-box" engagement exercise, diverse groups of young people should be included, and children and young people should be considered experts in their own digital experiences.
- **Invest in comprehensive digital and media literacy education:** This should include topics such as critical engagement with social media and algorithms, how to identify mis/disinformation, understanding online consent, privacy and digital footprints, and how to build healthy online habits. Critically, this form of education should be empowering rather than approached through a lens of fear and restriction. It should also be designed and delivered in collaboration with young people.
- **Prioritise safety-by-design and platform accountability:** Responsibility should not rest solely with children, caretakers, or schools. Policymakers should strengthen regulation that requires technology companies to design platforms that are safer, more transparent and less exploitative by default. This would address the root cause of many of the issues that young people face online.
- **Recognise and address structural inequalities that affect children's wellbeing:** Policymakers should recognise that digital harms cannot be effectively addressed in isolation from the broader social conditions that affect children and young people. Any efforts to improve children's wellbeing online should therefore be accompanied by efforts to address drivers of harm such as poverty and lack of access to services. The government should therefore invest in youth services and community spaces, mental health services, education, anti-

poverty measures and inclusive and accessible support systems for marginalised young people.

- **Ensure policy is evidence-based, proportionate and non-reactionary:** The government should resist building policy around media pressure and politically expedient narratives about childhood and technology. Policy development should be grounded in robust interdisciplinary evidence, nuance, and proportionality. It should also include regular review and evaluation mechanisms, given the speed at which technology policy develops.

Conclusion

CLC welcomes the opportunity to respond to the government's public consultation on Growing Up in the Online World and are grateful to members of Youth@CLC, as always, for giving so freely and enthusiastically of their time and experiences for their views to be reflected in this submission. While we welcome the momentum around this policy issue, and agree with the urgent need to grapple with the harms children and young people face online, CLC shares the concerns expressed by Youth@CLC about the outworkings of policies that seek to ban children and young people from the online world.

Across all areas of discussion, a clear and consistent message has emerged from young people: the online world is complex, nuanced and deeply embedded in their lives. While the harms are very real, Youth@CLC strongly reject simplistic or reactionary policy responses that seek to restrict children and young people's participation online through blanket bans or overly restrictive measures. Instead, policy development must be grounded in robust evidence, children's rights standards, and the lived experiences of young people themselves. Meaningful consultation with children and young people cannot be reduced to a symbolic exercise; their expertise, insights, and experiences must actively shape policy outcomes in tangible ways.

Ultimately, both CLC and members of Youth@CLC envision an online world where children and young people are not excluded or restricted. Policymakers should therefore seek to ensure that children are able to participate in the digital world safely, confidently and with the complete range of their rights fully realised.