

Mental Health Foundation response to Department for Science, Innovation, and Technology consultation

Growing up in the online world

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About the Mental Health Foundation

Since 1949, [MHF](#) has been the UK's leading charity for everyone's mental health. With prevention at the heart of what it does, MHF aims to find and address the sources of mental health problems so that people and communities can thrive.

MHF Opening Statement

The influence of digital technology on our mental health is one of the most contested but important social issues of our day.

The Mental Health Foundation's position has been informed through reviewing evidence and listening to young people, experts, and bereaved parents to understand what a responsible, proportionate response should be. Our considerations also included a roundtable discussion in Westminster in March.

We also held two focus group sessions with the [Mental Health Foundation Young Leaders](#) (Young Leaders)¹ network about social media and mental health. In these sessions we discussed the questions included in this consultation and sought their views, including perspectives on any social media ban. We will be including these contributions throughout our response. Our response also draws on our previously-published [organisational position](#), which can be summarised in four points:

- **Assess all platforms for child safety**
 - Any platform that cannot demonstrate safe design should not be accessible to children.
- **Allow platforms to return once they meet safety standards**
 - Some may choose to create child-specific services; others may adapt their functionality for younger users. Either way this puts the onus on companies to make their product safe by design.
- **Introduce age ratings, not a single cut-off**
 - As with films, we propose age categories - such as 13, 16 and 18 - to reflect different developmental stages.

¹ [Mental Health Foundation Young Leaders](#) (Young Leaders) are a diverse collective of young people from various backgrounds across the UK, who are keen to influence the ways in which the mental health and wellbeing of others can be protected. This initiative is run in partnership with Leaders Unlocked, a social enterprise focused on youth-led social action that enables young people to influence decision-making.

- **Support children offline**

- We need to rebuild support for children to socialise and play in their communities, including through youth clubs and sports facilities, and we need to ensure that they are equipped with the skills to navigate online worlds safely.

This is all part of a Safety by Design approach² which we believe must be at the forefront of any new regulatory regime. To this end, we also support the Safety by Design Code of Practice coordinated by the Online Safety Network.³ As part of this work, the Online Safety Act network also commissioned a representative poll of UK adults.⁴ This was conducted by YouGov and its findings will be cited in our responses to the questions in this consultation.

This Safety By Design code of practice would do the following:

- Social media platforms safety tested before launch, not after harm — with the people most affected by harm involved in the testing.
- Children’s accounts are private by default — with strangers unable to find or message them.
- Addictive features turned off by default — autoplay, infinite scroll, streaks, lootboxes, push alerts. They can be opted into where safe; they should not be the starting point.
- A ban on ‘dark patterns’ — the manipulative design tricks that push users into choices they would not otherwise make.
- Real accountability — a named board-level person responsible for safety, with public reporting on what’s working and what isn’t.
- Redress - routes for people harmed by services, or activity on them, to seek action from companies.

We are advocating for Ofcom to include this alongside other codes covering illegal harms and the protection of children.

Chapter 1: Understanding how children use technology

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

Social media can offer real benefits for its users, including young people. We heard from the Young Leaders that social media platforms can provide a sense of community and be beneficial to building an identity. Moreover, they stressed online spaces could provide other benefits. These included a place to secure mental health support, access to peer communities, and an opportunity to explore identity in a safer setting.

However, there was an acceptance that the current status quo is not working and that changes to how social media is regulated are required. In order for users to enjoy the full

² Safety by design can be defined as: the company designing and profiting from the product must build it to be safe from the start, rather than leaving users at risk of harm or expecting them to be responsible for keeping themselves safe.

³ Onlinesafetyact.net (n.d.) Safety by design: Code of practice. Available at: https://www.onlinesafetyact.net/documents/1684/Safety_by_Design_-_Code_of_Practice.pdf (Accessed: 20 May 2026).

⁴ YouGov surveyed 2043 UK adults aged 18+ between 1st May and 12th May, 2026. Data weighted to be representative of the UK adult population.

benefits that social media can bring, there must be appropriate safeguards and regulations, with punishments for organisations that do not meet these standards.

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

Whilst social media is not the only cause of the significant rise in mental health needs amongst children and young people, it is a critical and modifiable factor that has had a considerable influence on our children's mental health. The current situation is unacceptable, with far too many children being harmed by social media. Polling by YouGov on behalf of the Online Safety Act Network demonstrated that only 2% think platforms are doing a good job of reducing the risk of harm to users, with 61% agreeing that social media companies take little or no responsibility for designing products that are safe for users.³

The harm caused by addictive design, promotion of self-harm and eating disorder and hate material highlights this case. Social media platforms are often designed to promote continued engagement. This can encourage overuse or even addiction like behaviour among child users.⁵ 75% of children informed an Internet Matters survey that they have experienced harm online.⁶ Participants in our Young Leaders group sessions identified algorithm driven scrolling as a key risk with young people quickly pulled into prolonged, passive consumption.

The content readily available to young people on social media can also be particularly damaging. This can include suicide, self-harm, and eating disorders content, which has been demonstrated to be dangerous for young people's mental health. Furthermore, the feeds of young people can also be full of idealised images of bodies, which can impact on young people's sense of their own body image.^{7,8} Our research has demonstrated how devastating this can be to a young person's mental health causing them to feel shame, anxiety, and even suicidal thoughts.⁹ A review of 26 studies by European Psychiatry found that adolescents exposed to idealised body image content on social media platforms such as Instagram and TikTok experienced reduced self-esteem, higher levels of anxiety, and depression, and greater body dissatisfaction.¹⁰

News content shared on social media is another area of concern. The Office of the Children's Commissioner has detailed how some young people became fixated on what they saw, thinking obsessively or having intrusive and persistent thoughts that impacted their

⁵ Business & Human Rights Resource Centre. (2023). Meta's platforms are allegedly designed to be addictive to children. Accessed January 27, 2026. <https://www.business-humanrights.org/en/latest-news/usa-meta-faces-allegations-of-designing-platforms-to-foster-addiction-in-children/>

⁶ Internet Matters (n.d.) Internet Matters Pulse. Available at: <https://www.internetmatters.org/pulse/> (Accessed: 9 March 2026).

⁷ Mental Health Foundation. Body Image. Mental Health Foundation; 2019. Accessed January 27, 2026. <https://www.mentalhealth.org.uk/explore-mental-health/articles/body-image-report-executive-summary>

⁸ Jackson KL, Janssen I, Appelhans BM, Kazlauskaitė R, Karavolos K, Dugan SA, et al. Body image satisfaction and depression in midlife women: The Study of Women's Health Across the Nation (SWAN). *Arch Womens Ment Health*. 2014 Jun 13;17(3):177–87.

⁹ Mental Health Foundation (2025) Disturbing online content one of biggest looming threats to young people's mental health. Available at: <https://www.mentalhealth.org.uk/about-us/news/disturbing-online-content-one-biggest-looming-threats-young-peoples-mental-health> (Accessed: 10 March 2026).

¹⁰ Demetriou, M., Anagnostopoulou, V., Markatis, V., Peyioti, M. & Argitis, P. (2025) The impact of social media on adolescent body image: A comprehensive review. *European Psychiatry*, 68(S1). Available at: <https://www.cambridge.org/core/journals/european-psychiatry/article/impact-of-social-media-on-adolescent-body-image-a-comprehensive-review/C6D67875BB177DEB23C6C0566926811D> (Accessed: 9 March 2026)

daily lives.¹¹ Internet Matters polling¹² from 2025 highlights that 61% of children who consume news on social media say that they have seen a story that has worried or upset them in the past month, with 47% saying that seeing news content on social media gives them new problems to think about with many feeling overwhelmed.¹³ These themes also came out in our sessions with the Young Leaders who discussed being exposed to unmoderated extremist or harmful content online.

AI and its impact was another significant area of focus in our conversations with the Young Leaders. They cited abuse generated by AI as an area that caused concern and warranted further exploration. Some examples of this abusive content included the creation of sexually explicit or humiliating images, use of AI to amplify cyberbullying, and AI chatbots being used as mental health support without safeguards.

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

f) Don't know / Prefer not to answer

We would urge against a binary approach. As set out in our answers to the initial questions, social media use can provide real benefits, and weighing these against the serious harms it can cause to arrive a simple answer to this question would be an impossible task. Our position is that the current status quo is not acceptable and further regulations and safeguards are required.

Chapter 2: Interventions for safer, more positive experiences

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

a) Yes – but we would propose age categories - such as 13, 16 and 18 - to reflect different developmental stages and level of platform safety measures as opposed to a single cut off. This is set out in more detail in our opening statement.

13. To what extent do you agree or disagree with the following statement: “Social media services should have a minimum age of access of at least 16 and should not be accessible to any children under that age”

d) Somewhat disagree

We would direct you to our opening statement which discusses introducing different age ratings to reflect different developmental stages.

14. Would you support a legal requirement for social media services to have a minimum age of access lower than 16? If so, at what age would you set it?

e) Other

¹¹ Children's Commissioner for England (2024) I've seen horrible things: Children's experiences of the online world. Available at: <https://assets.childrenscommissioner.gov.uk/wpuploads/2024/10/Ive-seen-horrible-things-Online-Safety-Report-October-2024.pdf> (Accessed: 9 March 2026).

¹² The Internet Matters poll is a nationally representative survey of 1,000 UK children aged 11-17 and focus groups with children aged 13-17.

¹³ Internet Matters (n.d.) The impact of online news on children's wellbeing. Available at: <https://www.internetmatters.org/hub/research/impact-online-news-childrens-wellbeing/> (Accessed: 9 March 2026).

We would direct you to our opening statement which discusses introducing different age ratings to reflect different developmental stages.

Please explain the reasoning behind your answers about minimum age requirements

The current situation is unacceptable, and cannot be allowed to continue. Many platforms have failed to act and inflicted damage on our young people. These platforms should lose access to our children as a matter of urgency. No social media platform should be able to have access to children unless they meet clear safety standards, independently assessed.

However, this does not equate to support of a blanket and permanent ban on all social media for under 16s. Instead, we would favour an approach which introduces age ratings and not a single cut-off. As with films, we would advocate for different age categories – perhaps 13, 16, and 18 to reflect different developmental stages. Different social media services would have different age categories.

A legal requirement for a single minimum age of access was also not favored by the Young Leaders. They indicated that making platforms safer would be a far more effective approach. Moreover, fully removing access would not necessarily address underlying harms and could worsen outcomes for vulnerable users. Instead stronger default safety settings for under-16s and clearer enforced standards on algorithmic content, particularly around misogyny, racism, sexualised content and violent content could be more effective. They also argued that young people routinely bypass restrictions and that bans simply delay exposure until thresholds are crossed.

15. What do you think the impacts would be of having a minimum age requirements higher than 13 for social media services? For example, impacts on the safety and wellbeing of children, or the impact for parents and carers, as well as other users. You could also comment on the impact on all users' privacy and data or on business costs, revenue, and innovation.

The impact of having a minimum age requirement higher than 13 is likely to be varied. Undoubtedly there could be potential positive impacts such as reduced exposure to harmful and distressing content, and a lower risk of algorithm-driven mental health harms. However, these also need to be weighed up against the risks of blocking access to support and peer communities, and other unintended consequences. Young people can often use online spaces to seek help, identify affirmation and connection. There are also doubts about how effective any age restrictions would be. Some existing research shows that children can often bypass age checks and restrictions may push them to less moderated spaces.¹⁴

Individuals participating in the Young Leaders focus groups argued having a minimum age requirement higher than 13 could bring negative outcomes with a ban worsening outcomes for vulnerable users. Moreover, overly restrictive approaches could increase isolation, particularly for young people experiencing bullying, unsafe home environments, or mental health difficulties.

This is why we need a regime where individual services are judged on their safety, and where the content and systems available to young people are suitable for their developmental stage.

¹⁴ Molly Rose Foundation (2026) *Australia social media ban: research briefing*. London: Molly Rose Foundation. Available at: https://mollyrosefoundation.org/wp-content/uploads/2026/04/MRF_Australia-Social-Media-Ban-Research_Briefing-April-26.pdf (Accessed: 27 April 2026).

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

e) Other

It is our view that the digital age of consent is necessary but insufficient as a measure on its own. A defined age can provide legal certainty for platforms and regulators and is a clear trigger for parental involvement.

However, the current digital age of consent is not grounded in how children actively develop. Children's understanding of privacy and data evolves gradually and not suddenly at 13.¹⁵ Research indicates that awareness develops gradually with age and not necessarily at a fixed threshold. Development is cognitive, emotional, and social and does not align with a single age threshold. As with our view on social media use in general, we would advocate for a tiered age-appropriate design to digital consent.

However, the success of any consent model will ultimately be limited if systems continue to be risky by design. There is evidence that vast quantities of data are collected before the age of 13 and many children use social media before the age of 13 despite the rules of social media platforms, thereby limiting the effectiveness of any age of digital consent. The current model over relies on children to protect themselves in environments designed against their interests.¹⁶

In our opening statement we argue for a safety by design approach that places more of the onus on platforms as opposed to children. Children should not bear the burden of managing risk. Platforms should be required to default to the highest privacy levels, avoid harmful design patterns, and limit data extraction. If platforms fail to reach these standards, they should not be allowed access to our children.

17. What risks or burdens may be associated with raising the minimum age of digital consent? For example, ensuring parental consent, costs to industry, access to services, volume of requests, etc

The Mental Health Foundation does not have evidence for this question.

18. What should be considered to make raising the digital age of consent effective and workable? For example, suitable approaches to verify users' ages (including where parental consent is required) or suitable approaches to verify a parent or carer's identity, age and relationship to the child.

As we have argued in our answer to question 16, we do not believe raising the digital age of consent is sufficient alone to protecting our children and their data, while accepting it is one of several policy levers that should be pursued.

No age-gating measure is ever going to be totally effective, and there will always be some children and young people who will be able to find their way round the system. This was highlighted in sessions with the Young Leaders. Participants from these sessions were sceptical about age verification and ID based enforcement. They cited possible privacy breaches, data misuse fears, and past negative experiences with age checks. To secure support from young people, any age-gating measures must take into account their concerns.

¹⁵ Stoilova, M., Livingstone, S. and Nandagiri, R. (2019) *Children's data and privacy online: Growing up in a digital age*. London: London School of Economics and Political Science.

¹⁶ 5Rights Foundation (2023) *Disrupted childhood: The cost of persuasive design*. London: 5Rights Foundation.

Young people broadly support age checks, but want to see systems that actually work.¹⁷ Young people have a strong reluctance to share personal information and want to see their privacy respected. Privacy preserving methods need to be prioritised with a focus on proving age and not the full identity. One way of doing this might be through zero knowledge proof. The burden also needs to be taken away from children with a greater emphasis on platforms to make their platforms safer.

While there is merit in looking at how we can tighten how current checks operate, for the system to be truly effective it needs support from children and young people.

19. To what extent do you agree or disagree with the following statement: “There is a case for changing the digital age of consent for some online services but not others”

a) Strongly agree

As we set out in our answer to Question 16, research indicates that awareness develops gradually with age and not necessarily at a fixed threshold. Development is cognitive, emotional, and social and does not align with a single age threshold. As with our view on social media use in general, we would advocate for a tiered age appropriate design to digital consent.

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

a) Live streaming

b) Ability to send nude images or videos

c) Disappearing content

d) Location sharing

e) Connecting or talking to strangers

We consider each of the other functionalities in turn and explain the reasoning for our answers.

Live Streaming

There is growing evidence that live streaming is one of the higher risks online activities that young people can engage in. This is due to the real-time interaction with strangers, a lack of effective moderation in real time, and behavioural and psychological pressure. Evidence from the NSPCC has revealed that 12% of children have video-chatted with strangers, and 10-11% were asked to remove clothing during conversations.¹⁸ The real time social pressure can also amplify harm. Broadcasting in live time increases emotional reactivity and the risks of impulsive decisions which is associated with anxiety, social comparison, and regretful

¹⁷ Internet Matters (n.d.) *Age assurance and online safety: Parents' and children's opinions*. Available at: <https://www.internetmatters.org/hub/research/age-assurance-online-safety-parents-children-opinions/> (Accessed: 21 May 2026).

¹⁸ NSPCC (2020) *Livestreaming and video-chatting: Snapshot 2*. London: National Society for the Prevention of Cruelty to Children. Available at: <https://inege.com/wp-content/uploads/2020/12/livestreaming-video-chatting-nsppc-snapshot-2.pdf> (Accessed: 20 May 2026).

behaviour. Children may also encounter sexual requests, bullying in chat comments and harmful content.

Ability to send nude images or pictures

We support the existing law on Child Sexual Abuse Material. Children should not have the capability to send such images or videos.

Disappearing Content

Disappearing messages can lead to undetected, escalatory interactions. The NSPCC has highlighted that abuse is harder to detect and report, and that any abuse is likely undercounted.¹⁹ This can create high-risk environments. Offenders can explicitly exploit features and the loss of evidence can worsen harm through preventing early intervention, and enable repeat offending. There are also specific mental health impacts to consider. With young people believing the content to be gone there is a willingness to share more personalised details which can increase the likelihood of emotions such as regret, shame, and anxiety. Moreover, in platforms where these features exist, there is often reduced moderation which amplifies the chance of content going unchecked.

Location Sharing

Location sharing can link online activity to real world physical risk. This means risks can be physical, relational, or psychological. The ICO has suggested that geolocation sharing can expose children to stalking, bullying, harassment, and abuse.²⁰ Location sharing also enables monitoring and surveillance by partners or peers. This does create potential safeguarding concerns around coercive control, sextortion, and intimidation.²¹ The surveillance and loss of autonomy can lead to stress and anxiety.²² Young people can also interpret tracking by partners as love or care even when it is coercive or abusive.²³ However, young people have also set out how this can provide them with connection, convenience, and reassurance and act as a social glue.²⁴ There are also appropriate uses of it by parents and other caregivers. Any restrictions therefore would need to be nuanced.

Connecting/Talking to Strangers

¹⁹ NSPCC (2025) *Data shows how criminals are using private messaging platforms to manipulate and groom children*. London: National Society for the Prevention of Cruelty to Children. Available at: <https://www.nspcc.org.uk/about-us/news-opinion/2025/data-shows-how-criminals-are-using-private-messaging-platforms-to-manipulate-and-groom-children/> (Accessed: 20 May 2026).

²⁰ Information Commissioner's Office (ICO) (n.d.) *Geolocation tracking*. Available at: <https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/childrens-information/childrens-code-guidance-and-resources/how-to-use-our-guidance-for-standard-one-best-interests-of-the-child/best-interests-framework/geolocation-tracking/> (Accessed: 20 May 2026).

²¹ Canadian Broadcasting Corporation (CBC) (2025) *Location sharing leaves teens at risk of sextortion, coercive control and intimidation, experts warn*. Available at: <https://www.cbc.ca/news/canada/manitoba/child-protection-social-media-location-sharing-1.7630482> (Accessed: 26 May 2026).

²² Brown, C. and Hegarty, K. (2024) 'Fear and distress: How can we measure the impact of technology-facilitated abuse in relationships?', *Social Sciences*, 13(1), 71. Available at: <https://www.mdpi.com/2076-0760/13/1/71> (Accessed: 26 May 2026). [mdpi.com]

²³ Swettenham, M. (2025) 'Haunted online: Exploring the mental health impact of cyberstalking', *European Journal of Public Health*, 35(Suppl. 4). Available at: <https://doi.org/10.1093/eurpub/ckaf161.1402> (Accessed: 26 May 2026).

²⁴ Rutledge, P.B. (2025) *Why teens love location-sharing: From safety net to social glue*, *Psychology Today*, 18 July. Available at: <https://www.psychologytoday.com/us/blog/positively-media/202507/why-teens-love-location-sharing> (Accessed: 26 May 2026).

This is a primary safeguarding risk. Around 31% of children aged 9-16 report that strangers have tried to contact them online.²⁵ Talking to strangers can be the entry point for sexual exploitation, criminal exploitation, and manipulation. Younger children from the ages of 11 and 13 can be particularly at risk of these harms, especially grooming.²⁶ Children exposed to harmful interactions report anxiety, fear, confusion, and distress. Contact with strangers is often linked to exposure to harmful content, pressure to share images, and bullying or harassment. However, younger people remain eager to meet new people and see online spaces as social and exploratory. The online space can also be an opportunity to make friends and talk with others who share your interests. This has to be balanced against the risk of exploitation and coercion.

21. Based on your previous answers, please specify your preferred minimum age for each of the functionalities below:

a) Live streaming – a tiered approach.

Due to the risks and dangers set out in our previous answer, live streaming should not be allowed for those under the age of 13. For the ages of 13-15 we would advocate for restricted live streaming with no public broadcasting, no interaction with strangers, and strong defaults. Then for ages 16-17, we would propose greater autonomy. However, there should still be strong safety features, age-appropriate design, moderation and friction.

b) Ability to send nude images or videos – age 18

As stated above, we support the existing law on Child Sexual Abuse Material. Children should not have the capability to send such images or videos.

c) Disappearing content – a tiered approach.

The evidence points towards a tiered approach. This equates to those under the age of 13 not having access to disappearing messaging. For those aged 13-15, we would advocate for strong restrictions with the default setting turned off. For older teenagers from the ages of 16-17, we would advocate for conditional access with safeguards. This means increasing autonomy, but also some safeguards such as friction, strong reporting tools, and audit trails.

d) Location sharing – a tiered approach

As with the above functionalities, we would strongly oppose this feature being available to under 13s. From aged 13 to 15, we would call for this functionality being heavily restricted with the default set off, and this setting only be allowed with trusted contacts and on a short-term basis. For older teenagers we would be in favour of conditional, controlled use. This would equate to there being no default setting, but visibility being limited with clear prompts and friction.

e) Connecting or talking to strangers – a tiered approach

Those under the age of 13 should have no contact with strangers. They are at the highest risk of grooming and manipulation. For younger teenagers we would suggest restricted and safeguarded contact. This would provide them with some independence, but also protection

²⁵ Internet Matters (2024) *Children's Wellbeing in a Digital World: Index Report 2024*. London: Internet Matters. Available at: <https://www.internetmatters.org/hub/research/childrens-wellbeing-in-a-digital-world-index-report-2024/> (Accessed: 20 May 2026).

²⁶ UK Parliament (House of Commons Library) (2025) *Online safety for children* (Briefing Paper CBP-10205). London: House of Commons Library. Available at: <https://researchbriefings.files.parliament.uk/documents/CBP-10205/CBP-10205.pdf> (Accessed: 20 May 2026).

whilst they are at a vulnerable age. For older teenagers, we would favour conditional access with default restrictions on and prompts before engaging with unknown users.

22. To what extent do you agree or disagree with the following statement: “Restricting children’s access to these features/ functionalities, would provide for a safer online experience for children”. Features/functionality include live streaming, the ability to send nude images or videos, disappearing content, location sharing and connecting or talking to strangers

a) Strongly agree

We would direct you to our answers to 20 and 21 which sets out our reasoning.

23. What do you think the impacts would be if some online services were required to introduce age restrictions on specific features and functionalities? For example, impacts on the safety and wellbeing of children, or the impact for parents and carers, as well as other users. You could also comment on the impact on all users' privacy and data or on business costs, revenue, and innovation.

While it is difficult to comprehensively quantify the impacts until they are introduced, we believe considered and careful regulation as set out in our opening remarks would have a positive impact on the mental health and wellbeing of children. These measures would significantly reduce the harms that children are exposed to, which have been evidenced to be a driver of mental ill-health. We would also direct you to our answer to Question 15 which discusses the impact of possible regulations.

24. The following design features are sometimes known as ‘persuasive’, meaning they may encourage children to stay online for longer. From the following list, please select the ones you think are particularly ‘persuasive’ to children: (Please select all that apply).

a) Infinite scrolling

d) Alerts and push notifications

e) Content recommendation algorithms

h) Other – streaks, in-built image filters, and personalised “For You” feeds

These are all features which have been evidenced to foster addiction. We set out our reasoning below for each feature.

- Infinite Scrolling – infinite scrolling can remove natural stopping points and can create a ‘just one more’ loop. This can encourage prolonged, passive consumption without conscious choice.
- Alerts and push notifications – these can trigger repeated checking behaviour and exploit reward anticipation. This results in interrupting offline activity and pulling users back in.
- Content recommendation algorithms – these algorithms can personalise content to maximise engagement and can also continuously serve emotionally stimulating or novel material. This leads to habits being reinforced by aligning content with user preferences and vulnerabilities.
- Streaks – streaks can create obligation and fear of breaking the streak. This can turn engagement into a daily commitment.

- In-built image filters – this can encourage repeated posting and checking for feedback. It will also reinforce social validation loops.
- Personalised “For You” feeds – these feeds can blend algorithmic curation and infinite scroll, making it harder for users to disengage.

25. Which of these features do you think should be age restricted? (Please select all that apply)

a) Infinite scrolling

d) Alerts and push notifications

e) Content recommendation algorithms

h) Other – streaks, in-built image filters, and personalised “For You” feeds

A safe platform enables children to explore their interests in ways that match their developmental stage, without exposing them to habit-forming design or harmful content. It should be built with the intention of supporting children’s growth and wellbeing – offering age-appropriate material and enabling meaningful relationships with appropriate people, such as family, real-life friends, and peers who share their interests, without being artificially compelled to over-use a platform. These design features that we list above run contrary to this and should automatically disqualify a platform from being accessible to children.

Moreover, as part of best practice, social media platforms should be reducing the algorithmic promotion of harmful content. Particular attention must be centred on the needs of girls, LGBTQ+ youth and those with disabilities who face disproportionate body image pressures. To this end, we would argue for an age restriction of at least 16 for these features.

26. Based on your previous answers, please specify your preferred minimum age for each of the features below.

a) Infinite scrolling – 16 years old

d) Alerts and push notifications – 16 years old

e) Content recommendation algorithms – 16 years old

g) Other - streaks, in-built image filters, and personalised “For You” feeds – 16 years old

In this answer we have chosen to focus on the features we have talked about in answers to previous questions.

27. Would you support the following restrictions for children’s access to online services? (Please select one)

c) Both – Daily screen time limits and overnight access for individual apps

Excessive screen time is consistently linked to poorer mental health, with screen time above two hours per day associated with worse mental health outcomes.²⁷ Early childhood is a

²⁷ Stiglic, N. and Viner, R.M. (2019) ‘Effects of screentime on the health and well-being of children and adolescents: a systematic review of reviews’, *BMJ Open*, 9(1), e023191. Available at: <https://doi.org/10.1136/bmjopen-2018-023191> (Accessed: 27 April 2026).

period of heightened vulnerability with children under five years of age particularly sensitive.²⁸ Yet, the evidence does not suggest all screen time is damaging. Harm is most consistently observed beyond specific thresholds, above one hour for preschoolers and two hours for older children and adolescents.²⁸ Below these thresholds associations are often weak, with moderate, well-managed use does not reliably predict poor mental health outcomes.²⁷ To this end, we would support daily screen limits for all online services of one hour for preschoolers and two hours for older children and adolescents.

Moreover, the mental health impacts will vary depending on how screens are used, what the screens are used for, and when the screens are used. Passive consumption shows the strongest negative associations with attention, emotional regulation, and wellbeing.²⁷ Social media, and media multitasking are particularly linked to impulsivity, cognitive overload, and emotional difficulties.²⁹ Educational or interactive use show fewer negative and sometimes neutral or modestly positive associations.²⁷ Screen use especially in the evening and night time reduces sleep duration and quality which can have a serious impact on mental health.³⁰ Any screen time limit needs to fully take into account the impact of screens during different times of the day. Mental health risks are greatest where high screen use co-occurs with inactivity, poor sleep and limited adult engagement.

Any screen time limits should distinguish between passive and interactive use, educational versus entertainment content and single tasking versus multitasking environments. Limiting passive, rapid-switching and social media use is likely to yield greater mental health benefits than focusing purely on total screen hours. Firm protections should also be introduced around sleep with no screens an hour before bedtime for school aged children. Furthermore, screen time limits are most effective when matched with guaranteed daily physical activity, adequate sleep duration, and regular face to face social interaction.

28. What do you think the impacts would be if online platforms were required to restrict specific features or functionalities, or to introduce time limits? For example, impacts on the safety and wellbeing of children, or the impact for parents and carers, as well as other users. You could also comment on the impact on all users' privacy and data or on business costs, revenue, and innovation.

Most studies observe the impact of existing screen behaviour, rather than experimenting with manipulating use. It is therefore hard to accurately set out exactly what would occur if time limits were introduced. However, the evidence does indicate there could be benefits to time limiting apps, especially when limits are well targeted.

Time limits that keep use below empirically observed thresholds are likely to reduce risk, even if usage does not totally drop to zero. Introducing app limits that cap use is likely to reduce harm compared with unrestricted use. Moreover, app limits that turn off access in the evening or impose stricter caps after certain times are likely to amplify mental health benefits.

²⁸ McArthur, B.A., Tough, S. and Madigan, S. (2021) 'Screen time and developmental and behavioral outcomes for preschool children: a systematic review', *Pediatric Research*, 89(2), pp. 437–450. Available at: <https://doi.org/10.1038/s41390-020-01316-9> (Accessed: 27 April 2026).

²⁹ Uncapher, M.R., Lin, L., Rosen, L.D., Kirkorian, H.L., Baron, N.S. and Bailey, K. (2017) 'Media multitasking and cognitive, psychological, neural, and learning differences', *Pediatrics*, 140(Supplement 2), pp. S62–S66. Available at: <https://doi.org/10.1542/peds.2016-1758D> (Accessed: 27 April 2026).

³⁰ Hale, L. and Guan, S. (2015) 'Screen time and sleep among school-aged children and adolescents: a systematic literature review', *Sleep Medicine Reviews*, 21, pp. 50–58. Available at: <https://doi.org/10.1016/j.smrv.2014.07.007> (Accessed: 27 April 2026).

29. What factors are important when determining which apps, sites or services to apply minimum age of access restrictions to? For example, user-to-user interaction, the ability to post material, persuasive design features, risky functionalities, ability to generate non-text mediums such as video or images, the target age group, the size of the service.

Not all young people face the same risk of harm online. Vulnerability, age, gender, being a member of a minoritised group can all increase risk of harm.³¹ This needs to be considered when deciding on relevant regulation.

As set out in our opening statement, we support a system of safety by design. This means that any platform that cannot demonstrate safe design should not be accessible to children. In particular, this would mean social media platforms not being able to push features that foster addiction. This would include streaks, infinite scrolling, and intrusive push notifications. Young people should have control over what they see and what they choose to open.

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

We would support any apps, sites, or services that does not meet the safety by design criteria we have set out being banned to children under the age of 16. In addition, we are supportive of age categories for different platforms to reflect the different developmental stages of growing up.

31. What factors are important when determining which apps, sites or services to apply age-restrictions on specific features and functionalities? For example, user-to-user interaction, the ability to post material, persuasive design features, risky functionalities, ability to generate non-text mediums such as video or images, the target age group, the size of the service.

In our opening statement, we set out which factors are important when defining further regulation.

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

See our opening statement.

33. Some services are already exempt from the Online Safety Act. Examples include internal business services, services with limited functionalities and services provided by persons providing education or childcare. Are there additional types of service which you think would be appropriate to exempt from age restrictions? These might include services whose primary purpose is delivery of educational content, services that offer specific child or teen accounts or versions, or services which offer parental controls.

The Mental Health Foundation does not have evidence for this question.

34. What are the benefits to children of using AI chatbots? For example, this might include as a search function, for educational purposes, for creativity.

AI chatbots have a wide variety of impacts, and used in the right context with the right restrictions can be positive. They can act like a coach to help people wanting to develop

³¹ NSPCC (2026) *The impact of harmful online content on children*. Available at: <https://learning.nspcc.org.uk/media/wmypc5cf/impact-harmful-online-content.pdf> (Accessed: 9 March 2026).

psychological skills like self-confidence, assertiveness, or emotional regulation. Additionally, AI chatbots can provide individualised advice on spotting unhealthy thinking patterns, or suggest action to support good mental health and can provide a view about what might be behind feelings like anxiety and suggest options to manage them in a healthy way, or offer useful advice on topics like relationships. AI chatbots might also provide a more comfortable way of opening up for someone who is struggling to ask for help because of stigma or cultural pressures.

In our research with the Young Leaders, they suggested there could be some benefits to AI chatbots. In particular how AI chatbots could provide access to support and education and be a useful tool for research. However, they were also clear that they should not be treated as emotional support or friends, particularly for young people.

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

m) Other

AI chatbots will not always be right and often make things up. They can tell us what we want to hear, reinforcing unhealthy thoughts or behaviours. Furthermore AI chatbots are not trained clinicians and should not be treated as a replacement for therapy for anyone experiencing a mental health crisis. Health services or specialist helplines should be sought in these circumstances.

Sadly, there are also documented cases where AI tools have worsened mental health symptoms, encouraged dangerous behaviour, and even triggered thoughts of self-harm and suicide.³² These chatbots are commercial tools that unlike therapy can be designed to foster dependency and keep you coming back for more. They will not always have a user's best interests at heart. Additionally chatbots will not always be private. Anything that is said to these chatbots can be recorded, noted, and used by the AI company in the future. There have been examples of companies releasing conversations into the public domain. AI can also be biased and can give answers that perpetuate wrong and harmful stereotypes.

The Young Leaders highlighted the risks that can come with using AI chatbots for mental health support without the guarantee that there are proper safeguards. Using an AI chatbot to support mental health and wellbeing is becoming increasingly common with 37% of UK adults reporting that they have used an AI chatbot to support their mental health or wellbeing.³³ Moreover, in the second session with the Young Leaders, they named a range of characteristics that were most risky for children. These are detailed below:

- **Framing of the chatbot as a friend, or as a human who can provide emotional support** – the Young Leaders were concerned about chatbots being marketed or experienced as someone who is always there to listen. This was deemed potentially dangerous as it encouraged emotional reliance, often amidst a lack of other support.
- **Using the chatbot for mental health or personal advice** – the Young Leaders expressed strong concern about the discussion of sensitive issues with AI. There was a clear desire to emphasise that AI is not a counsellor or trusted adult and can give misleading information.

³² Mental Health Foundation (n.d.) *What role can AI play in supporting good mental health?* Available at: <https://www.mentalhealth.org.uk/explore-mental-health/blogs/what-role-ai-supporting-good-mental-health> (Accessed: 27 April 2026).

³³ Mental Health UK (n.d.) *Artificial intelligence and mental health*. Available at: <https://mentalhealth-uk.org/help-and-information/health-and-wellbeing/artificial-intelligence-and-mental-health/> (Accessed: 27 April 2026).

- **Blurring of lines between human and AI interaction** – the Young Leaders disclosed how easy it is to forget that AI is not a real person, and this creates real risks particularly for younger users or those with additional needs.
- **Lack of transparency about how AI works** – the Young Leaders argued that users often did not understand how AI generated responses, and were unaware of inaccuracies, biases, and limitations. This could lead to over trusting the chatbot and thereby increasing the risk of harm.
- **Lack of safeguards** – the Young Leaders talked about how chatbots are widely accessible with few age-appropriate restrictions. This was linked to the broader problem of young people using AI because human support was missing or absent.

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

In our conversations with the Young Leaders they stressed that AI is not inherently harmful, but guidance, context, and ethical framing is required. There also remained concern about AI generated abuse. Some examples of this can be found in our answer to question 10. While not necessarily in favour of blanket age bans, individuals from the Young Leaders sessions identified a need for further regulation around AI marketed as emotional support or companions, greater transparency about AI generated content, with new safeguards to prevent harm from misinformation and overreliance.

37. Should AI chatbots have minimum age restrictions?

b) Yes – restrict access to certain features and functionalities

AI chatbots that do not meet the criteria set out in our answer to the previous question should have an age restriction of at least 16.

38. What do you think the impact would be of introducing age restrictions on AI chatbots or certain features and functions? For example, impacts on the safety and wellbeing of children, or the impact for parents and carers, as well as other users. You could also comment on the impact on all users' privacy and data or on business costs, revenue, and innovation.

In this answer we will first set out at the potential risks of AI chatbots and the harms that originate from them, before assessing using the best available evidence what the impact would be of introducing age restrictions. As we set out in our answer to Question 15, and in our opening statement which sets out why we do not support blanket bans, impacts are likely to be varied and not entirely positive or negative.

Evidence has demonstrated that large language model chatbots can affirm or amplify delusional beliefs, especially in people with existing vulnerabilities. AI chatbots can often fail to detect suicidal ideation or escalating risk and do not consistently signpost to appropriate systems. Chatbots have sometimes congratulated or encouraged delusional claims instead of challenging them. There is also a considerably risk of overreliance which can be dangerous given the lack of clinical efficacy training.³²

Introducing age restrictions on AI chatbots could have a number of positive impacts. For instance, a reduced exposure of children and adolescents to evidenced harms and a lower risk of AI induced crisis escalation. Additionally, there will be clearer regulatory expectations and accountability. However, any restrictions need to be proportionate and crucially paired with other measures. We have set out some of these measures in our answers to the previous questions.

There are also risks to introducing age restrictions. AI chatbots are currently filling gaps created by mental health service shortages. While we know AI chatbots should not be viewed as substitutes for trained medical professionals, there are occasions as set out in our answer to Question 34 where they can form part of the response. Adding age restrictions could remove a coping tool for many young people without replacing it with a safer option. There is also the danger of pushing users towards riskier, more dangerous sites. Therefore any measures need to be carefully thought through and well balanced, with support available for users.

Chapter 3: Enforcement and compliance

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

- a) Strongly agree
- b) Somewhat agree
- c) Neither agree nor disagree
- d) Somewhat disagree
- e) Strongly disagree
- f) Don't know/Prefer not to answer

The Mental Health Foundation does not have evidence for this question.

40. What should be considered to make minimum age restrictions effective and workable? This could mean either age restrictions for access to whole services, or for specific risky or ‘addictive’ features or functionalities.

A perfect system without any workarounds is not realistic. Some children and young people will always seek ways around the system – this should be expected. Therefore, regardless of any minimum age restrictions complementary legislative and policy measures should also be implemented. These measures should both encourage broader design safety principles across all online environments and limit the most obvious and straightforward ways for children to circumvent this regime.

41. What do you think the impacts might be from requiring age assurance across a greater number of online platforms? For example, impacts on the safety and wellbeing of children, or the impact for parents and carers, as well as other users. You could also comment on the impact on all users' privacy and data or on business costs, revenue, and innovation.

The impacts of any age restriction measures are likely to be varied, as we set out in our answer to question 15. Undoubtedly there could be potential positive impacts, such as reduced exposure to harmful and distressing content, and a lower risk of algorithm-driven mental health harms. Young people can often use online spaces to seek help, identify affirmation and connection. As set out in our previous answers, it could also push children and young people to riskier or unregulated platforms. Some existing research shows that children can often bypass age checks and restrictions may push them to less moderated spaces.

We need a regime where the onus is placed on platforms to improve practice and safety and children get the benefit of a safe space to interact with others, whilst not extending this too far and still allowing young people to access communities like forums that might not be considered social media.

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

We would direct you to our answer to question 40.

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

The Mental Health Foundation does not have any evidence for this question.

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

The Mental Health Foundation does not have any evidence for this question.

45. Which of the options below do you think the government should prioritise to reduce circumvention of online safety rules in the UK? (Select the most important to you)

a) More education for children

b) Restricting children's access to VPNs

We have yet to be convinced there are any legitimate uses for VPNs for children and therefore would support restricting children's access. Alongside this and for online safety rules to be truly effective they require buy-in from young people. Therefore, we also need to build societal consensus and use public messaging and digital education to build organic support and adherence should be the primary objective.

46. To what extent do you agree or disagree with the following statement: "Everyone should go through age checks to access a VPN if it would prevent children using them"

b) Somewhat agree

We would support this approach providing that it is carried out in a privacy-preserving way, most achievable using zero knowledge proof.

47. What do you think the impacts would be if VPNs were age-restricted? For example, impacts on the safety and wellbeing of children, or the impact for parents and carers, as well as other users. You could also comment on the impact on all users' privacy and data or on business costs, revenue, and innovation.

Age-restricting VPNs could significantly reduce the number of children and young people accessing these sites. This is undoubtedly a positive development, even if some children and young people would seek workarounds. On specific impacts, we would direct you to our answer to Question 15 which considers the impacts of restricted access.

48. What should be considered to make age-restricting VPNs effective and workable? For example, public trust and engagement with increased age assurance requirements, accessibility of age assurance methods and variations of age assurance approaches across services, interaction with legitimate uses of VPNs.

The Mental Health Foundation does not have any evidence for this question.

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

c) Neither agree nor disagree

Legislation has already been introduced to parliament which allows schools to ban phones. We would therefore argue that no further evidence is required for this question as a decision has already been reached.

50. What impacts would there be if this guidance was made statutory and why? For example, on disruption in lessons, bullying or harassment, parental views on mobile phone policies, staff, etc.

Whilst this decision has already been made, our answer below sets out some of the likely outcomes.

Making schools mobile phone free would likely have net positive effects on students’ mental health.³⁴ The evidence suggests that the strongest benefits would be for younger pupils and vulnerable groups.³⁵ The specific positive impacts would likely be around attention regulation, emotional self-control, anxiety linked to social media, and classroom stress.

While there is limited evidence that phones specifically increase bullying, they do provide another outlet for bullies to operate on.³⁶ Therefore, removing phones from the school day would reduce one instrument that allows harassment to escalate rapidly and invisibly. This harassment and bullying disproportionately impacts minoritised groups.³⁷ Bullying is also harder to detect when it occurs on mobile phones. The creation of phone-free environments would shift harmful behaviour back into observable spaces or verbal or behavioural forms. Theoretically, this should be easier to identify, and for teachers to deal with.

However, a statutory phone ban should not be viewed as a panacea and it would need to be paired with strong offline safeguarding and reporting mechanisms. Bullying is one of the biggest risk factors for poor mental health, and any measure that can reduce bullying will have a positive impact on mental health.³⁸ We support schools taking a whole school

³⁴ Hahnefeld, A. et al. (2024) ‘Correlation of screen exposure to stress, learning, cognitive and language performance in children’, *European Child and Adolescent Psychiatry*, 33, pp. 1–14. Available at: <https://doi.org/10.1007/s00787-024-02593-6> (Accessed: 27 April 2026).

³⁵ Goodyear, V.A., Weiss, H.A. and Bonell, C. (2025) *Smartphone use and mental health: going beyond school restriction policies*. *The Lancet Regional Health – Europe*, 51, 101237. <https://doi.org/10.1016/j.lanepe.2025.101237>

³⁶ Anti-Bullying Alliance (n.d.) Prevalence and impact of bullying: prevalence of online bullying. Available at: <https://anti-bullyingalliance.org.uk/tools-information/all-about-bullying/prevalence-and-impact-bullying/prevalence-online-bullying> (Accessed: 20 May 2026).

³⁷ Gini, G. and Espelage, D.L. (2014) ‘Peer victimization, cyberbullying, and suicide risk in children and adolescents’, *JAMA*, 312(5), pp. 545–546. Available at: <https://doi.org/10.1001/jama.2014.3212> (Accessed: 27 April 2026).

³⁸ Arseneault, L. (2018) ‘Annual research review: The persistent and pervasive impact of being bullied in childhood and adolescence’, *Journal of Child Psychology and Psychiatry*, 59(4), pp. 405–421. Available at: <https://doi.org/10.1111/jcpp.12841> (Accessed: 27 April 2026).

approach to mental health which would include the introduction of anti-bullying programmes which have been demonstrated to be effective.³⁹

51. Are there specific circumstances where you think children should be permitted to have or use a mobile phone during the school day? (Please select all that apply)

- a) Medical needs**
- b) Special Educational Needs and Disabilities requirements**
- c) Individual safeguarding concerns**
- d) Caring responsibilities**
- e) Educational or learning purposes**
- f) Travel to and from school**

There are specific occasions when children should be permitted to use mobile phones. This is particularly important where access is necessary for safety, health, inclusion, or protected support. For vulnerable children especially young carers and those with health conditions, phones function as critical support infrastructure. Blanket bans can bring unintended harms to wellbeing, safety, and care. However, any exceptions should be strictly limited and defined.

Chapter 4: Preparing children for a digital future

52. Which areas of media or digital literacy do children and families most need additional help with? (Please select all that apply)

- a) Managing screen time and online habits**
- b) Spotting adverts, sponsored posts, or AI generated content**
- d) Online behaviour and experience**
- e) Checking if information is true**
- f) Understanding how social media works**
- g) Staying safe online**
- h) Reporting harmful or upsetting content**
- i) Knowing which apps or sites are right for their age**

In our answer to this question, we focus on the areas we have identified above.

Education and digital literacy emerged as the key themes in our conversations with the Young Leaders. There was a view that children do not suddenly acquire critical skills at 16 or 18, and that media literacy and AI literacy are essential life skills, and that young people need better education on how social media and AI work.

³⁹ Gaffney, H., Ttofi, M.M. and Farrington, D.P. (2019) 'Effectiveness of school-based anti-bullying programs: A meta-analysis', *Aggression and Violent Behavior*, 45, pp. 111–133. Available at: <https://doi.org/10.1016/j.avb.2018.07.001> (Accessed: 27 April 2026).

To this end, there is a need to promptly update the digital and media literacy element of the curriculum. This would aid development, at appropriate ages and developmental stages, of the skills that children will need to understand, anticipate, and successfully navigate the risks they will encounter on adult platforms once they become of age. This should include age-appropriate units on platform, algorithmic, and AI literacy, and a granular understanding of engagement driven business models and the ways in which personal data can be monetised by platforms.

There was also a sense among the Young Leaders that young people are often exposed to adult themes too early, with little meaningful difference between under 18 and adult feeds, with a loss of safe online spaces for teenagers. The Young Leaders also spoke about needing more help to recognise and avoid harmful spaces, and how to develop healthy relationships online. They cited how young people faced an increased pressure to conform, were worried about missing out, and anxious about an overreliance on online communities where offline alternatives are limited.

Parents were identified as often less digitally confident than their children, making traditional parent controls insufficient on their own. The Young Leaders discussed the importance of educating parents alongside children particularly on platform mechanics, data use and consent, signs of online harm and supporting open, non-punitive conversations rather than surveillance-based approaches. In our conversations with the Young Leaders they suggested parents needed more support and help in a range of areas. This included understanding platforms, settings, and safety tools; recognising misinformation and AI generated content, and gaining greater digital confidence and literacy.

Families also needed clearer guidance from government and platforms about what protections exist, what children are exposed to by default, and how to seek help or redress.

53. If you are responding as a private individual, where do you go for help with online safety or media literacy skills? By online safety or media literacy skills, we mean things like staying safe online, understanding digital content and using the internet confidently and responsibly. (Please select all that apply)

- a) Schools or childcare settings**
- b) Community or youth spaces**
- c) Parent or carer groups or networks**
- d) Public services**
- e) Faith or cultural groups**
- f) Non-governmental online sources**
- g) Government websites**
- h) Tools and resources on online platforms**
- i) None of the above/I haven't used any of these to find help**
- j) Don't know/Prefer not to answer**
- k) Other**

Not applicable – The Mental Health Foundation is responding as an organisation.

54. Where, if anywhere, would you like to see more support available in the future? This could include places you already use but don't offer support and you would like them to, or places that could offer more support with help from government or others. (Please select all that apply)

- a) Schools or childcare settings**
- b) Community or youth spaces**
- c) Parent or carer groups or networks**

In our answer we have chosen to focus on areas specifically cited by the Young Leaders and where we have the most existing evidence. This is not to necessarily argue that the other places suggested in the answer would not also benefit from more support.

We would like to see more support available on governmental sources. However, for this to happen significant resource must be invested in Whitehall's ability to respond to online safety developments before they inflict the scale of harm we are seeing today.

In previous answers we have detailed the harmful impacts of social media on body image and mental health. To this end, we advocate for the mandating of evidence-based body image education within the national curriculum that addresses media literacy, critical analysis of advertising and identification of harmful online content, without placing the burden for this solely on teachers who already face substantial pressures related to delivering PSHE content.

We also believe it is imperative that all schools implement comprehensive, anti-bullying programmes. This should include cyberbullying. In our answer to question 50 we set out how bullying is a significant risk factor for mental ill health. Programmes such as KiVa, which combine universal classroom lessons with targeted interventions by school teams, demonstrate the effectiveness of whole-school approaches that focus on changing peer group dynamics rather than solely targeting bullies and victims.

These interventions should include staff training and be adequately funded. Implementation must incorporate whole-school approaches that foster inclusive environments, build emotional resilience, establish clear reporting mechanisms and engage parents and the wider community. Special attention must be given to digital literacy education and implementing specific protections for vulnerable groups, including LGBTQ+ youth, children with disabilities, young carers and those from ethnic minority backgrounds who face disproportionate rates of bullying.

Our conversations with the Young Leaders reinforced the perception that schools should be a primary access point for support and that more support is needed in these settings. The Young Leaders spoke about how many offline social spaces are limited or inaccessible and expressed a desire for more youth clubs and community spaces where young people can socialise safely offline. Parents were also viewed as a key support network, who were under-supported. In our answer to Question 52 we identify some of the areas where parents need more support.

55. Outside of schools, how could the UK government better support children and young people to stay safe and feel supported online? (Please select all that apply)

- b) By supporting parents and carers to support children online**
- d) By supporting youth organisations and community groups to help children online**

f) By involving children and young people in designing support

Alongside any reforms to the online world, we are calling for greater offline support for children's wellbeing.

The experiences and aspirations of children who will be affected by these restrictions, and of the young adults who will be exposed to unrestricted platforms, should be taken into account alongside the views of parents both when calibrating the design safety conditions and when periodically reviewing the effectiveness of the regime as a whole. Some participants from the Young Leaders also argued that young people are more responsive to peer-based support rather than top down government messaging. Peer concern and shared experiences feel more real and trusted.

There was also a consensus among the Young Leaders that there would be considerable value in providing accessible support and guidance for parents and carers. Parents were expected to regulate children's online lives without a full understanding of platforms, privacy settings, and AI systems.

56. What types of support would help children with additional needs stay safe online and build digital skills? By 'additional needs', we mean children who may need extra support for a range of reasons (such as learning, communication, health or access needs). (Please select all that apply)

- a) Clear, simple information using plain language**
- b) Content adapted for different ages, abilities, or needs**
- d) Support delivered through trusted local or community services**
- f) Support that helps parents or carers guide children online**
- h) Don't know/ Prefer not to answer**
- i) Other**

As a mental health charity we will focus our answer here on what types of support would help children with mental ill-health or are particularly vulnerable to mental health stay safe online.

Whilst no children should be exposed to the most harmful content, they should also be empowered to choose whether, and under what circumstances, they are exposed to material they find uncomfortable, as appropriate to their developmental stage. Further conversations need to take place with Ofcom on how they can create a safe online environment for individuals with specific individual mental health vulnerabilities which can be impacted by content which may be harmless to other children.

As set out in our earlier answers, the Young Leaders argued that blanket rules or bans don't work, particularly for young people who already feel excluded online. They suggested that for children with additional needs, helpful support would include specific help with privacy settings, blocking and reporting, and understanding how feeds are shaped. The Young Leaders suggested this could be delivered through youth services, community organisations, and trusted third-sector providers.

In our answer to Question 52, we discuss the role that parents can play in providing support. We would again point you to this answer. We are also supportive of the principle of age-gating as set out in our opening statement.

57. Who would you trust to determine what is meant by ‘high quality’ online content’ for children 13-16? (Please select all that apply)

- a) Government – where information is clear**
- c) Parents, carers or trusted adults – who understand how platforms work**
- d) Children**
- g) Youth workers**
- h) child advocacy charities and organisations**

Decisions about platform safety must be independent of government and involve parents, teachers, medical professionals, children themselves, and importantly, representatives of communities most likely to be served poorly by social media companies, including in their freedom of expression. This includes, but is not limited to, LGBTQ+ communities. Given the scale of the task, it is reasonable that tech companies wishing to serve children in the UK should fund the new safety regime in part or in full. We would also direct you to our answer to Question 45 which talks about the role that children should have in this process.

The Young Leaders identified several reliable sources that could be trusted to deliver high quality content. Examples raised included schools, universities, and workplaces; youth services and community organisations; libraries and community hubs; and government backed public information when it is clear, limited, and practical. There was also strong trust identified in charity-led and third sector organisations. Regarding the delivery of content, the Young Leaders reiterated that young people often trusted other young people. They should be trusted to deliver any content or information. This is not to exclude adults, but it required adults with a true understanding of the system. There was a strong lack of trust in platforms whose motives were heavily questioned.

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

- a) Develop best practice principles for industry**
- h) Other**

In this answer we will focus on the need for best practice principles for industry and further legislative changes. We are supportive of developing best principle guidelines for industry. Lord Nash’s [joint statement of principles](#) would be a good starting point for these guidelines. We have shared alongside this submission.

To begin with, there is a need to incentivise safety by design. Protections for children should be structured around a set of design safety and transparency conditions. These conditions must be anchored in primary legislation, but capable of developing dynamically by using more nimble subsidiary processes. The conditions should identify the characteristics of platforms that are harmful or otherwise not suitable for children, and should do so in a way which can ensure that child protection measures are only targeted at platforms where characteristics present a risk of harm to children and platform designers are given clear signposts and incentives, to encourage and facilitate the development of platforms which are suitable for use by children.

The statutory conditions for accessing children should address platform characteristics which pose risk of harm to children. These include but are not limited to: infinite scrolling, auto-playing, penalties for non-engagement, real time alerts and notifications, stranger pairing

and stranger contact facilities, recommending OSA-defined illegal or child-inappropriate content, livestream broadcasts, location tracking, AI features raising risks of attachment or manipulation, compliance with data privacy laws, and enforcement of platforms terms of service including minimum age limits.

Safety for children should also mean that social media platforms are no longer able to use features that foster addiction, such as streaks, infinite scrolling, and intrusive push notifications. Users should feel they are making an informed choice to open Facebook or Snapchat, rather than feeling like they are being forced against their will.. As we set out earlier in our answers, the Young Leaders expressed deep scepticism about age verification and ID based enforcement and that enforcement would be ineffective.

In addition, we would advocate for the strengthening of the Online Safety Act (OSA). The OSA is already making important contributions to protecting the public's mental health, but there is scope to improve the legislation so that it takes a better approach to protecting children. The OSA could be strengthened in the following ways:

- It should take a 'safety by design' approach, where products that are available for children are required to be developed from the ground up in such a way that they are safe and appropriate for a child's developmental stage. A representative poll conducted by YouGov on behalf of the Online Safety Act Network found that 84% of people are convinced that requiring companies to prove their products are designed and tested to be safe before use would keep all users safe online.³ 65% believe that social media platforms and their leadership, not parents or individual users should hold primary responsibility for designing products that are safe to users.³
- It should also provide meaningful empowerment for children, requiring providers to give them, and their parents and carers, control over the content they see. All children are different and can experience different types of content as harmful; they should be able to choose whether, and under what circumstances, they are exposed to material which may lead to anxiety or discomfort, including journalistic material related to war and climate change, and material which might impact their perception of their own bodies. The Act does not currently provide for this.
- There is also a need to bring generative AI fully into the scope of the Act, in particular to address the impacts of mental health disinformation and dangerous advice (including on self-harm and suicide).
- Include emergency powers which would temporarily empower Ofcom to require immediate interventions from social media platforms to address a threat to public order. If these pathways were to be provided, dangerous misinformation could be more quickly identified by independent researchers and tackled before it results in offline violence. This could help to curb the spread of harmful misinformation and hate against asylum seekers and refugees, preventing its escalation into real-world violence such as what took place most notably in summer 2024.

Furthermore, while Ofcom has taken steps in addressing pornography and suicide material online, progress is more limited on tackling sites that encourage eating disorders and protecting children on some of the largest, household name sites. Ofcom should be encouraged to be bold in its approach, and provided with appropriate resources to fully tackle the broad range of harms that can damage people's mental health.

We also asked the Young Leaders what action should be prioritised to support positive online spaces for young people. These have been covered throughout the consultation, but are summarised in full detail below. These five priorities were identified:

- **Reduce algorithmic harm and addictive design** – in particular limits on extreme personalisation for young people, safer default settings, and reduction of algorithmically driven escalation pathways.
- **Invest in digital literacy focusing on mental wellbeing** – the Young Leaders supported education that explains how social media and AI affect emotions, behaviour, and self-esteem.
- **Ensure access to human support** – there is a lack of human support both on platforms and in real life. The Young Leaders stressed there needed to be clear alternatives to young people turning to AI chatbots for emotional support.
- **Create age appropriate and developmentally supportive online spaces** – children are too readily exposed to adult content and pressures too early, with too little meaningful distinction between teenage and adult online environments. The Young Leaders identified the need for clearer and better boundaries.
- **Rebuild offline alternatives** – the Young Leaders highlighted that mental health risks increase when online spaces become the only place young people feel connected. They argued for greater investment in youth clubs and community spaces.

59. What should be considered when taking further action to support positive online spaces and content for young people? For example, how would this work in practice for services, taking into account existing best practice across industry, and who should feed into future guidance.

As we have set out in our previous answers, there is an important role for further education. A programme of public health messaging should be used to build broader societal understandings of the harms and risks posed to children by engagement-driven business models and the persuasive design characteristics of unsuitable platforms, as much as by the inappropriate content.

Ultimately, a cross-government approach to protecting children’s mental health is needed. Many of the actions that we need to improve children’s safety and give them access to social connection in the offline world are the responsibility of departments other than DSIT. We are pleased that the government has published a call for evidence for its cross-government strategy on mental health and we will be feeding into it that children’s social connection should be a key plank of the new plan.

60. To what extent do you agree or disagree with the following statement: “Parents should have control over the online experiences of their children”

b) Somewhat agree

The views of parents should be considered both when calibrating the design safety conditions and when periodically reviewing the effectiveness of the regime as a whole. However, this needs to be done in partnership with children and young people.

The Young Leaders agreed that there is a role for parents in shaping and supporting their children’s online experiences. However, while parental involvement is important, they stressed the need for some realism about what parents can realistically control, and that any parental role needs to be combined with platform, government, and community support.

61. How should this level of control change for children of different ages? For example, a 16-year-old and an 11-year-old.

We would argue that this level of control should follow the age gating principles we have set out with different levels of control for different stages of development.

62. What would help parents and carers to more effectively use parental controls? For example, more information on how to do this on purchase of a phone, help from platforms on how to set up, or greater standardisation across tools.

The Mental Health Foundation does not have evidence for this question.