

Growing up in the online world: a national consultation

Response from the Children's Commissioner

May 2026

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Foreword from Dame Rachel de Souza



In the time I have been Children's Commissioner, the online world has changed rapidly, as have the ways in which children interact with it. Perhaps the single biggest change is this: we used to speak about the differences between children's offline and online lives. But over the time I have served as Commissioner, the walls that separate the two have come tumbling down.

Over the last five years, I have consistently called for the strongest possible protection for children online in order to meet that challenge. I want to see protections that apply far beyond just social media platforms, but are designed to cover all of the ways in which children engage with the online world.

Because all too often, I hear from children and their families that we have been too slow at every step. I hear concerns that our policy response will not be able keep pace with how technology changes. And that is justified because our policy response is not keeping up with the technology, and the technology is only getting more sophisticated.

So while I welcome the proposals to restrict social media platforms for younger children, we need to think bigger. We need to ask ourselves at every turn if we really, deep down, think that what we are doing is good enough for children. We need to pause, and ask ourselves if we'd allow anyone to design a system that delivers the outcomes we are seeing, or if we could develop the internet all over again if we would allow for such a divide between online and offline life to exist in the first place.

We would never allow a 14-year-old girl access to explicit pornography if it were bought from a shop. Yet accessing it is normalised online.

We would be incredibly concerned if a strange adult approached a 13-year-old boy in a playground. Yet I hear time and again from children that they're approached by strangers when gaming.

Few people of good conscience think that children in psychological distress don't need a trusted professional to speak to. Yet we seem far too relaxed about children turning to chatbots for advice, guidance, and companionship. It is time for us to act. We need to decide what kind of world we want children to live in, and make concrete steps towards making that world a reality.

We have taken our first steps in that direction. The UK has passed the Online Safety Act. Despite these significant changes, the harm from technology companies' unconditional and unfettered access to children is becoming clearer and clearer through conversations I have had with both children and parents. We have to listen to children, and they have told me that the things they value about the online world often come at the expense of their wellbeing, and sometimes their safety. They want digital spaces to learn, connect and play, but these spaces are almost never designed with their best interests in mind.

There is no clearer evidence of the dereliction of adult duty than the fact that I have heard from children that they are often taking it upon themselves to keep themselves safe and well - turning off notifications, deleting accounts and using app blockers - while adults continue to debate how children should be taught to navigate these murky digital waters.

The enormous burden of responsibility for being safe and well online must not be placed on children's shoulders - it is our duty as adults to make sure that the world is safe for children. I want the government to force companies to make sure children are not just safe on their platforms, but also well. How the government responds to this consultation will shape what it's like to grow up in this country for years to come. I do not believe it is an overstatement to say that online regulation will be the defining issue for England's children over the next decade.

We will never eradicate every risk, but we can do much better than we are. It is almost three years since the Online Safety Act was passed, yet children are still being exposed to numerous risks online. Children are still seeing harmful content that they should not be: 15% of UK children aged 13-17 had seen content promoting eating disorders, and 13% had seen content promoting suicide and self-harm. And the

legislation doesn't protect against the other more insidious harms children face – the pressure to stay online, the hours wasted, the endless scrolling late at night.

That is why the government is right to commit to urgent action. We cannot continue to allow children to be exposed to these risks. I have resisted calls for bans until now. But this has gone on too long.

Now, we must draw the line.

I am calling for all online services – not just social media platforms, but gaming sites and any platforms that make use of harmful features and functionalities – to be banned from accessing children, until they can prove that they are designed in a way that will protect children's safety and wellbeing.

These are the terms that I believe this debate should be using. It is not about 'banning children'. Children have done nothing wrong. They are not the culprit. It is about banning powerful technology companies from accessing and harming England's children.

I want to see the government push technology companies to address not just what children are seeing, but how they are seeing it. That will mean drawing up a list of all the features that make online services risky for children - because they increase the risk of addiction, seeing harmful content, or being contacted by strangers. That list will need to include persuasive design features like autoplay, infinite scrolling and popularity metrics (the "like" button and count, for instance) as well as features that allow users to share their location and livestream.

Any service using these features and functionalities should not be allowed to access children until they remove those features or genuinely mitigate the harms from them. If and when online services prove, using a robust risk assessment system, that they are safe, the age limit can be removed.

My response applies this same call to AI tools, including AI chatbots, which remain a serious cause of concern owing largely to the lack of regulation of them, or even knowledge about what risks they present. I am concerned we are making the same mistake with AI as we did with social media, and I want children to be protected from that before more harm is done. The limited anecdotal evidence I have heard from children, and the developing evidence base around children using LLMs for emotional companionship, have left me truly alarmed at this issue.

This restriction must apply equally to all children – that means until they turn 18. Because if we are genuinely seeking to safeguard children from harm, we cannot allow 16- and 17-year-olds to have lesser protection.

Most of our online culture came about relatively organically. The internet is too big, too sprawling, too odd to be the product of any one vision. But this means we have too often been reactive in our response to it. Slow to legislate. Unable or unwilling to fully grasp the scope of what we are dealing with. As concern mounts, I believe this current moment offers us cause for alarm, certainly – but more than that, it offers us huge opportunity.

Today, we have a chance to redefine the relationship children have with the online world. We can articulate a vision of a good online life. We can redraw the boundaries of what is acceptable. I believe that children can and should be able to enjoy an online world where they learn, play and connect with others – but a radical rebalancing is required before that can happen. A clear age limit on all online services must be the first step.

Executive Summary

The government's consultation on children's use of social media and the online world focused on specific problems and solutions which the Commissioner has responded to. A summary of the Commissioner's key positions is as follows:

Minimum age limits

- All online platforms that are accessible to children should be required to complete an enhanced risk assessment, assessing for risks to both children's safety and wellbeing from platform design. These features include livestreaming, ephemeral messaging, encrypted messaging, infinite scrolling and recommender feeds.
- Any service that does not remove harmful content or risky features should not be able to provide services to under 18s.
- Services that are required to implement a minimum age of 18 must use Highly Effective Age Assurance. All services that have a role in providing a child access to specific online services must also put in place age checks. This includes devices, internet service providers and app stores.
- Age checks should be monitored and tested for effectiveness. If children are not able to access online services that are age restricted to 18, they should be regarded as successful.
- The government should ask Ofcom and the Children's Commissioner to develop a list of harmful and risky features and functionalities.

Screen time limits and curfews

- Screen time limits and curfews should be a last resort. They could be included in wider efforts to provide information to parents about which services are most appropriate for children – for instance by providing age ratings as for films or games.

AI tools

- The government must bring in new legislation that would bring all AI products, content and companies in scope of existing – and any new – online safety regulation and UK product safety standards.

Circumvention and enforcement

- VPNs should not be banned for children. They should be subject the same risk assessments that we recommend all internet services undertake. Internet service providers and app stores should provide age assurance to ensure unsafe VPNs cannot be used by children.

1. Understanding how children use technology

Benefits and risks

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

The Children's Commissioner has been championing children's digital rights since the beginning of her tenure in 2021, and was made a statutory consultee of the Online Safety Act 2023.¹ The Commissioner has produced numerous reports documenting the harms that happen to children of all ages and demographics online, and has also asked children what they want to see changed about the online world to make these spaces not just safe, but also supportive of their childhoods and wellbeing. Evidence on the impact and exposure of children to harmful content covered in the Act is staggering: 70% children had been exposed to online pornography before the age of 18 when surveyed in 2025, and the average age to have first seen it was 13.² It is normal for the online pornography children see to be violent - 58% of respondents who had seen pornography had seen depictions of strangulation, which is now a prohibited category of pornography under the Crime and Policing Act 2026.³ Beyond pornography, other content categories which should be addressed by Ofcom's implementation, supervision and enforcement of the Online Safety Act have been found to be commonly consumed among children. The Children's Commissioner's polling of children in April 2026 found that 15% of UK children aged 13 to 17 had seen content promoting eating disorders and 13% had seen content promoting suicide or self-harm in the last 3 months¹. No child should see this content.

Despite the passing of the Online Safety Act 2023 and the concerted effort from the Commissioner and civil society to support Ofcom in implementing and enforcing it, the Act has not resulted in the mitigation of those risks to children. The concern of parents and the ongoing evidence from children,⁴ as well as the need to call a consultation on this topic, evidences this. The Commissioner's priority will

¹ This online survey was commissioned by the Children's Commissioner's office and conducted by market research company OnePoll, in accordance with the Market Research Society's code of conduct. Data was collected between 10 and 17 April 2026. All participants are double-opted in to take part in research and are paid an amount depending on the length and complexity of the survey. This survey was overseen and edited by the OnePoll research team. OnePoll are MRS Company Partners, corporate membership of ESOMAR and Members of the British Polling Council.

always be the safety of children. The Commissioner does not think that online platforms should have access to children if they cannot prove they are free from the litany of risks that have rendered this consultation necessary at all, and much of which could and should have been addressed with the thorough and swift implementation of the Online Safety Act and the Age Appropriate Design Code.

The Commissioner's analysis of 253,000 responses from children and adults on their behalf to The Big Ambition⁵ found that online harms are evolving alongside technology, and without the changes the Commissioner has recently called for to Ofcom's Children's Codes, the Online Safety Act itself and further measures to keep step with this technological evolution, harm will only ever be addressed retrospectively, which is not the Children's Commissioner's view of what good safeguarding for a good childhood looks like. New and emerging risks of harm include content becoming more sophisticated to circumvent regulations⁶, and new technologies that are not always covered by existing regulations such as AI chatbots.⁷

The consultation document does provide strong evidence about the risks of some of the functionalities that present a high risk of harm to children, including livestreaming, disappearing messages, stranger pairing and location services. The Commissioner notes that these functionalities were themselves identified in Ofcom's Children's Register of Risks, which lists the risks of harm regulated services should assess against when carrying out their risk assessments.⁸ It has been noted in the Commissioner's response to Ofcom's consultation on the children's code, and by a number of civil society organisations⁹, that despite being identified in the Register of Risks, Ofcom has chosen not to include corresponding safety measures in their children's codes of practice.

To demonstrate that weighing risks and benefits is a flawed approach to justifying any further changes to the online regulation, and that introducing measures based on the principles of safety and wellbeing is a more effective and appropriate step towards the goal of enriching children's lives, the Commissioner will address some of the benefits identified in the consultation document itself.

The document lists a number of online services children use to be creative and connect with other people. While the Commissioner's own research has shown that creativity and connection are important to children, the Commissioner also recognises that there are some platforms that enable creativity and connection but nonetheless have minimum age requirements for users to be on those platforms. Examples which the document includes recording original songs and sharing them on Soundcloud, whose Terms of Service states that, unless a user is based in the USA or in the European Union, users

must be 16 years or older.¹⁰ Similarly, TikTok requires users to be 16 years old in order to use TikTok Live¹¹, the function that allows users to livestream videos on their platform. The Commissioner recognises that the consultation does discuss age restrictions for certain platforms and functionalities later in the questions, but the Commissioner does not think that the consultation should list something as a benefit if it is not supposed to be accessed by children. Instead, questioning if the platform itself is safe according to a set criteria which the Commissioner will discuss later in this consultation, and if it is supportive of children's wellbeing, is a more accurate way to consider if accessing these platforms is beneficial for children. The Commissioner also notes that a number of case studies in the document that purport to show that content on named online platforms like YouTube Kids can "significantly boost their language skills in creative and engaging ways". Youtube Kids does host some educational and beneficial content, but it also hosts other content that is equally accessible but should be regarded as low quality content that provides children with no enrichment, even if it does meet Youtube's own quality principles – which, crucially, are there to guide content-creators, not require them to be followed.¹²

The CCo wants the government to have a consistent and considered approach to bringing in changes to support children's digital wellbeing, and this means having a consistent approach to all new technologies as they are introduced to children's lives. The key question for the Commissioner is:

- i. has this technology been proven safe? and
- ii. will this technology promote children's wellbeing?

It is by this measure, not the weighing of benefits and risks, that the Commissioner urges decisions to be made.

2. Interventions for safer, more positive experiences

Restricting social media services by age

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

Yes. The Children's Commissioner is calling for a minimum age of access of 18 years old to be applied for any online services that is found to have risky features and functionalities as an emergency measure. The minimum age can be lifted if the online service in question removes those features or functionalities. Whether or not an online service needs to implement a minimum age limit should be determined by an expanded child risk assessment, in addition to the existing child risk assessment for harmful online content currently mandatory to all services accessible to children under the Online Safety Act. Services that are assessed to be low or no risk will not need to implement a minimum age limit. Examples of online services that are accessible to children include search services, gaming sites and apps, in addition to social media platforms.

The level of harm children are facing today is unacceptable. The Children's Commissioner's first priority is the safety of children. It is very clear, both from what children have told the Commissioner, and from the information which has not been provided by either Ofcom or technology companies, that allowing online services with risky features to have continued access to children in the way that they do is not tenable. The Children's Commissioner will therefore support the introduction of a further legal requirement for social media services which have specific features or functionalities to prevent children under the age of 18 to set up accounts on those platforms.

The Commissioner is calling for the minimum age of 18 for these specific cases because that is the age at which a child becomes an adult. Age itself is not a predictor of harm, and there are a number of factors are in play which make a child more vulnerable to online harm. This age limit is an emergency measure which should be brought in and maintained until online platforms have removed the features in question, and can prove their sites will not only keep children safe, but also ensure their general wellbeing.

All children are vulnerable to online harm, and age children is not the only determining factor in feelings of safety. Only 74% of UK 6- to 17-year-olds reported feeling safe online in April 2026, in polling carried out by OnePoll for the Children's Commissioner, after the Protection of Children's Code was enacted. This is 77% for children without SEND, but lower at only two thirds (66%) of children with SEND. These findings build on previous research carried out by the Commissioner's Office. In 2024, the Commissioner's office found that agreement rates with the statement "I feel safe online" varied by factors such as gender, SEND status, mental health, and education setting. Girls were less likely to agree with the statement than boys (67% and 75%). Children living in a mental health hospital felt the least safe online, with 43% agreeing with the statement, and 47% of those living in supported accommodation. Only 28% of children who disagreed they felt safe online agreed with the statement "you feel happy with the way you look". For comparison, 54% of children who agreed they felt safe online also agreed that they felt happy with the way they looked.¹³ This variance shows that there are a number of factors that contribute to how a child experiences the online world beyond the age of a child. What is indisputable is that harm is happening to children under 18 in a manner that adults do not comprehend and that the adults that are responsible for keeping children safe are still several steps behind existing and emerging risks.

The Commissioner wishes to highlight that this minimum age limit should be an emergency measure, lifted if and only when online services are able to prove to the public and the UK government that they have removed the risky features identified and are manifestly safe for children. The emergency measure should be introduced alongside robust enforcement of existing measures, the strengthening of the Online Safety Act and the cooperation of online platforms and regulators towards the same agreed goal. Children do not see the removal of themselves or their peers from the online world as the only solution – in fact, they agreed with a variety of options in the April 2026 polling. Things that children felt would make them feel safer online included having 'an adult to talk to if I see something bad' (35%), if they were not 'able to talk to strangers' (34%), could access 'child-only apps and websites' (32%) or if they had 'clear rules about what I can watch and play' (27%). Others wanted 'not having content suggested to me' (18%), 'not having any access to social media' (10%), or something else (1%), while for 5% nothing would make them feel safe online. Only 8% did not know what would make them feel safer online.

The introduction of a legal minimum age must be seen as an emergency measure in response to a crisis. That crisis is threefold:

- i. That harm is happening at scale;

- ii. That the existing measures we have to mitigate harm are not working, for reasons as varied as the fact that they are not yet in force, have not been implemented in a robust manner. or not evidenced yet to be working, and that these measures contain loopholes that require legal changes to be closed; and
- iii. That there is too much we do not know about the way these platforms work to say that they are safe enough for our children to be able to access them.

Until online services provide evidence that they are safe for children, the government needs to pull the emergency lever and block access to children.

Existing regulation requires services that are accessible to children to risk assess for risks of children encountering harmful content online, and for services to then choose which safety measures are needed to mitigate those risks.¹⁴ The Commissioner is recommending that this is expanded. Services that are accessible to children should have to risk assess for harm caused by all features and functionalities that present a risk of harm to children, in isolation of content. This includes features named later in this consultation document, such as infinite scrolling, push notifications and disappearing messages. The existence of any of these risky features should be considered a factor in a decision made about whether or not a platform meets the threshold for a minimum age. This is a risk-based approach.

A risk-based approach to setting minimum age limits must:

1. Require online services to provide evidence that they are safe for children at certain ages, before children at those ages are able to access services. This includes accessing any content on that site, not just a restriction on setting up an account.
2. Require the host of online services that are used to result in a child being able to access a specific online platform to have a duty to implement the minimum age limit as defined by UK legislation and relevant codes. This means that app stores, internet service providers and devices should provide multi-level barriers for a child being exposed to inappropriate content, platform design or experiences. What this looks like in practice is, if you are a child, your Internet Service Provider should check your age at the point of sale of your device and data plan set up, and that information should be shared with the device's app stores. Online platforms in scope of the age restriction should have a separate age gate that complies with Ofcom's criteria for Highly Effective Age Assurance.

3. Establish a safety by design code of practice, which would act as a reference point for assessing whether or not a service has children's interests built into its design. The protection of children's rights and wellbeing is a choice that is made at the development stage of a model. A safety by design code will give online platforms a blueprint for enacting that choice in their service and certify them as potential services that children under 18 could use.
4. The Commissioner strongly recommends that the government appoints Ofcom to oversee the implementation of this new restriction, and provides them with the power and confidence to implement the restrictions to their full potential.
5. The government should commission an independent body to develop an age rating criteria, which would inform the design code against which services are assessed for their risk level.

Named features in the consultation which the Children's Commissioner is particularly worried about and which should be included in the risk assessment are:

Safety risks:

- a) Livestreaming
- b) The ability to send nude images (which the CCo would call a lack of enforcement of the Online Safety Act, as this is illegal)
- c) Disappearing content
- d) Location sharing
- e) Ability to communicate with strangers online

Wellbeing risks:

- a) Infinite scrolling
 - b) Autoplay
 - c) Affirmation features (eg, 'like' counts)
 - d) Push notifications
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e) Content recommender algorithms

The Children's Commissioner has noted that a legal age limit is not a perfect solution, nor is it a long term solution. It is an emergency measure given how unsafe children now are. The Commissioner notes that a legal age limit may result in children migrating to other online spaces that are less well known and therefore less likely to be regulated or safe. It is with regard to these factors that the Commissioner is strongly urging the government to take a "both and" approach to online regulation. It is essential that any legal age limit is introduced as part of a wider approach to improving children's digital lives, which will include continued efforts to strengthen both the Online Safety Act and its implementation, further legislation specific to new technologies such as generative AI, and a Safety by Design code for all online services, including internet providers and app stores.

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"?

The Commissioner agrees that there should be a legally enforceable minimum age of access for social media of at least 18, for the reasons set out above and in addition to the continued effort to strengthen other parts of the online safety regime.

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?

No, for reasons described above.

What do you think the impacts would be of having minimum age requirements higher than 13 for social media services?

There are risks of setting age limits. In *What I Wish My Parents Knew*¹⁵, a guide for parents and carers on supporting their children's digital lives written with input from children, participants explained that they were scared to tell their parents that something happened online due to fear of parental punishment. Age limits could exacerbate this risk, with children worried about the fact that they were not meant to be on certain platforms to begin with, and as such the government should consider mitigation of this

outcome, via information for parents about how to deal with difficult conversations about online harms. As described in the response to questions above, there is also the risk of children migrating to unsafe or less well known sites, and the risk that children will attempt to circumvent additional measures.

To address the other impacts named in the consultation question, and as has been stated multiple times in the Commissioner's responses to Ofcom's consultations on the Protection of Children's Codes of Practice, the Commissioner does not recognise business costs or the impact on revenue or innovation as factors that should be weighed up against the safety of children.

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

The age of digital consent should be 18. The Age Appropriate Design Code, which provides protection for all children under the age of 18 in the design and development of a service, is a statutory code of practice which applies to information society services likely to be accessed by children in the UK.¹⁶ This includes many apps, programs, connected toys and devices, search engines, social media platforms, streaming services, online games, news or educational websites and websites offering other goods or services to users over the internet. It is not restricted to services specifically directed at children. The substance of the Code is data protection, but this can and should be more widely applied to children's overall online lives.

What risks or burdens may be associated with raising the minimum age of digital consent? Enforcement and compliance?

The Commissioner does not recognise business costs or the impact on revenue or innovation as factors that should be weighed up against the safety of children.

What should be considered to make raising the digital age of consent effective and workable?

Obtaining parental consent for under 18s will be an additional burden for parents and industry, and designing a workable and accurate system for recording parental consent remains a challenge.

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”?

An assessment should be made about whether an online platform provides children with a legitimate reason (for example, joining a political party) and there is a reason that service should be exempt from a higher age limit. The assessment should be made using the same criteria used by services to assess if they should be accessible to children under 18, described above. Services should have to prove that they are a) safe and b) beneficial to child’s wellbeing.

It is notable and significant that platforms use children’s data to market products to them, often not with their best interests at heart but the interests of business. This is a fundamental concern that requires a total redesign of the way the online world operates, which will not be achieved by raising or lowering age boundaries.

Restricting services based on “risky” functionalities

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?

Features and functionalities named in the consultation:

- a) Live streaming**
 - b) Ability to send nude images or videos**
 - c) Disappearing content**
 - d) Location sharing**
 - e) Connecting or talking to strangers**
-

The Commissioner agrees that all the functionalities set out in this question should be counted as part of the risk assessment platforms complete to inform whether or not they need to bring in additional age restrictions, described in response to questions in this consultation.

Under the Online Safety Act 2023, indecent images of a child (Child Sexual Abuse Material) is an illegal content category.¹⁷ Any service which allows a child to send a nude image or video of themselves is in breach of the Act. All regulated service providers have to complete an Illegal Content risk assessment which Ofcom can and should request and scrutinise. The Commissioner would expect the regulator to assess this functionality as a significant risk to children and for them to oversee that the platform in question takes appropriate and sufficient steps to mitigate it. The Commissioner recommends that the government confirms that the regulator is taking as strong action as it has the power to, to prevent children from encountering these risks. There should be no ability for children to share these images, by design.

The Commissioner would like to address some of the named functionalities below and justify why they should be considered in this risk assessment.

Livestreaming spaces are inherently risky, as there is little to prevent harmful content being shared because of the nature of live broadcasting. Ofcom have recognised live-streaming as a feature of concern¹⁸ and have proposed that human content moderators are put in place on online platforms to moderate the content. As the risk of harm for live-streaming is content based, the Commissioner considers it possible for the regulator to go further on this point as live human moderation is unlikely to be widely effective at reducing the risk children either broadcast or consume harmful content. The Commissioner would strongly welcome age restrictions on services which have a live-streaming function and would welcome it being included in a risk assessment for an age limit.

Being approached by strangers online is an area of concern for the Commissioner, and this functionality is an example of the risks at play in this consultation which looks so narrowly at children's use of social media. Social media platforms are not the only platforms where children are approached by strangers. The Commissioner's research has found that gaming sites are high risk for this interaction too. Of all the UK children aged 6 to 17 polled by OnePoll in April 2026 for the Children's Commissioner, 87% reported that they play video games. The Commissioner's polling asked the 13 to 17 year olds who said yes whether, while playing video games, they had ever been sent a message or chat by someone they didn't know. Over half (51%) said yes, 46% said no, 2% did not know, and 1% did not want to say.

Based on your previous answers, please specify your preferred minimum age for each of the functionalities named in the consultation.

The Commissioner is calling for the minimum age of 18 because that is the age at which a child legally becomes an adult.

To what extent do you agree or disagree with the following statement: “Restricting children’s access to these named features/ functionalities, would provide for a safer online experience for children”

The Commissioner agrees that the features and functionalities identified in the consultation question are inherently risky for all users, particularly children. The Commissioner is calling for an emergency age limit to be put into place not only because there would be more limits to the online world they inhabit, but because it will force technology companies who want to provide a service to children to finally address the known risks of harm, and to redesign their services to be in the best interests of the child. The limit will have an immediate positive impact on children’s digital lives, as it will remove them from dangerous online spaces until such time that those spaces are made safe enough for them to return.

What do you think the impacts would be if some online services were required to introduce age restrictions on specific features and functionalities?

The introduction of age restrictions on specific features and functionalities would, if robustly implemented, represent one of the most significant improvements to children's online safety achievable within the current regulatory framework. The features that present the greatest risk to children such as open messaging from unknown adults, engagement-optimising algorithmic feeds, public discoverability, real-money mechanics, and live interaction with strangers, are key elements of the online infrastructure that could so easily be changed.

Restricting them would materially reduce children's exposure to grooming, to harmful content served by recommendation systems, to the anxiety-generating dynamics of public social performance, and to the financial exploitation embedded in platform monetisation systems. These are all preventable sources of harm.

However, the Commissioner cautions that the restriction of features on mainstream platforms without equivalent requirements on alternatives will displace children rather than protect them. The impact on children's safety is only positive if the regime applies consistently across equivalent risk environments.

'Addiction', compulsive design and displacement

Features and functionalities named in the consultation:

- a) Infinite scrolling
- b) Autoplay
- c) Affirmation features (e.g. 'likes', comments)
- d) Alerts and push notifications
- e) Content recommendation algorithms (these are algorithms which provide personalised recommendations on a user's feed)

The following design features are sometimes known as 'persuasive', meaning they may encourage children to stay online for longer. Which ones are particularly 'persuasive' to children?

All features identified in this question are persuasive, because they have one function and that is to keep the user engaged on whatever online service has chosen to use them. These features exist on the majority of the most popular online platforms used by children, and are features of both adult and child accounts, meaning there is no distinction or special regard paid to the needs of children's interests. As this "persuasive" function is designed with the interests of businesses at their core, with no possible argument to be made that they benefit children in any way, the Commissioner also regards these features as inherently risky and sometimes harmful.

The Children's Commissioner's April 2026 polling of 2,000 UK 6 to 17 year olds asked children if they had an account on social media. Around half (47%) said yes, with the proportion being much higher for older teens (74% of 13-15 year olds and 87% of 16-17 year olds). Of all these social media users aged 13 to 17, many (26%) would like to spend less time scrolling on social media each day. This is despite most

teenage children with a social media account taking action to manage the time they spend. Children are trying to have more control over their social media use. Only about a third of those polled (34%) do nothing to manage the time they spend on social media, but 27% turn off notifications, the most popular action, followed by setting time limits (21%), and putting their device somewhere else such as giving it to a parent or putting it in a drawer (19%). 12% reported having 'deleted one or more of my accounts' and 9% reported having used 'apps or other technology tools to block or limit access'.

In conversations with young people for numerous research reports, including *"I've seen horrible things": children's experiences of online harms*¹⁹ and *"What I wish my parents knew": a guide for parents and carers on managing children's digital lives*²⁰, children regularly bring up the impact these persuasive design features have on them. They express frustrations with feeling that they do not have control over the amount of time they spend online and on certain platforms.

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

As all these features are risky because they are designed without children's interests in mind, and that they are designed with the intention to retain users which often comes into conflict with the interests of children, the Commissioner strongly recommends that the presence of any of these features on an online platform or service is considered in the risk assessment the Commissioner is calling for services to have to carry out to determine if they are a platform that would be required to bring in a minimum age limit. Furthermore, the Commissioner would strongly recommend that the presence of any or a combination of these features automatically means that service is in scope of the minimum age duty.

The results of the Children's Commissioner's polling of 2,000 UK 6-to-17-year-olds in April 2026 demonstrates that children feel responsible for the volume of time they spend online, but not always in control of it.

If the government were to restrict the use of these features as a back stop, it would be an example of restricting children's access to parts of the online world whose primary purpose is not to enrich the lives of children until such time that those sites can prove they have righted themselves. This is the Commissioner's preferred approach.

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

The Commissioner recommends that all features named in this question are restricted for users aged 18 and under, for the reasons stated in response to questions 12 and 21.

Would you support children having daily screentime limits for individual apps, and/or children being restricted from overnight access for individual apps?

The Commissioner does not consider the suggested restrictions a solution to the problem this consultation is trying to solve. The issue at hand is that online platforms are not designed to support the wellbeing of children, but that children should have a right to use tools that enable them to learn, socialise and play safely. The solution to this is to require companies to change the elements of their services that present a risk of harm to children, or cause harm to them. Daily screentime limits or an overnight curfew will not achieve this and the Commissioner does not support them on their own.

The Commissioner regards problematic screentime use in children to be a harmful but preventable outcome resulting from the choice of platform designers. Problematic screentime is often defined by what is taking place on screens, not simply the volume of time spent on a device, and is most commonly caused by the features on a device or a platform. Problematic screentime is the product of a series of choices made by a developer in order to protect further the interests of an online business, which largely require users to give as much attention to a product as possible. It is therefore the responsibility of companies to solve, and it is government's role to say so.

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

The Commissioner does not anticipate that screentime limits alone will meaningfully address the problem at the heart of this consultation. Screentime limits and overnight curfews will mean there are technological blocks to children spending time on screens at night and at given times during the day. There are obvious benefits to these, as it will address the concern shared among parents and academics that screentime is having a negative impact on a lot of time-related parts of a child's life, like family life and playtime.²¹ However, the Commissioner notes that screentime limits alone will do little to address

the reasons children feel compelled to spend so much time on screens, even when they admit they do not want to. Screen time limits need to be introduced as part of a package of measures that confront the addictive design features of devices and online services.

As has been stated multiple times in the Commissioner's responses to Ofcom's consultations on the Protection of Children's Codes of practice, the Commissioner does not recognise business costs or the impact on revenue or innovation as factors that should be weighed up against the safety of children.

Which services age restrictions should apply to

What factors are important when determining which apps, sites or services to apply minimum age of access restrictions to?

The presence of persuasive design features and elements of a platform's online architecture, such as the ability to livestream, should automatically put a service in scope of the minimum age duty. The Commissioner's recommendation that all online services that are accessible to children have to carry out the risk assessment which would determine whether or not the minimum age duty applies to them means that the duty will be applicable to search services, gaming sites, and other online platforms as well as social media platforms. The features named in this consultation response are common features on a range of online services and it is right that they are also assessed for risks and addressed. The government should work with the Children's Commissioner's office and Ofcom to develop a full list of risky features to be used as an input in the risk assessment all platforms accessible to children based in the UK should have to fill out to legally have access to the UK market.

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

The Commissioner recommends that the framework establishing the minimum age of access should be outcomes-based rather than platform-type-based, defined by the nature and severity of risk presented to children. This should be updated regularly as new service types emerge. A static list of sites will always lag behind the technology.

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

There are specific features that the Children's Commissioner thinks should be included in the expanded risk assessment for children's wellbeing, recommended in response earlier questions. If a service uses these features, the Children's Commissioner does not think a service should have access to children. If a service chooses to remove them, then the minimum age duty can be revised. The following are examples (but a non-exhaustive list) of the features that should be identified as risks in the risk assessment and result in a service falling in scope of the minimum age restriction:

- iv. User-to-user interaction capability, particularly asymmetric interaction, where adults can initiate contact with children, view children's content, or identify children within a platform's user base, should trigger mandatory age assurance requirements.
- v. Persuasive design, or any features specifically engineered to: maximise time-on-platform, to exploit psychological vulnerabilities, or to manufacture social pressure (including infinite scroll, variable reward notification systems, public engagement metrics, and streak mechanics) are harmful to children's developing capacity for self-regulation and should trigger mandatory age assurance requirements.
- vi. Content generation capability, particularly where AI or other tools enable the rapid creation of realistic images, video, or audio. The capacity to generate non-consensual intimate imagery, to create realistic-seeming content of real individuals, or to produce content at scale without human review, represents a category of risk that did not exist at the last significant iteration of online safety regulation and must be treated seriously now.
- vii. Platform size is a legitimate operational consideration in determining the pace and modality of compliance, but must not determine whether obligations apply. A small platform presenting severe risks to children is not entitled to implement a lower standard of child protection than a large one.

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

Any service that is accessible to children and has identifiable risks of harm including specific features and functionalities should have the emergency minimum age applied until such time that those features and functionalities are removed. Every online service (including apps, search services, gaming and social media sites) is in scope of a child access assessment.

Are there additional types of service which you think would be appropriate to exempt from age restrictions?

The Commissioner does not think any additional services should be exempt from online safety duties.

Artificial Intelligence (AI) chatbots

What are the benefits to children of using AI chatbots?

Like most new technologies, the Commissioner recognises that AI and AI chatbots stand to benefit children's lives in some ways. However, the Commissioner cannot engage in a discussion about the benefits of children using a tool that not only has no standardised product testing for safety, and is largely out of scope of existing technological regulation, but that has succeeded in proving itself unsafe for not only child users but adults too. The speed at which AI and AI chatbots has been integrated into children's lives has outpaced any action or even consideration of how these might be certified as safe for children. The number of known unknowns about AI chatbots – including the quality of the data that they are trained on, a strong predictor of what they might be capable of producing, and the potential for harm – means that these tools have never been proven to be safe for children. Taking a safeguarding approach to any new or emerging technology requires the burden of proof to be on the product to show it is safe, rather than for children to have to prove that it is unsafe.

Which AI chatbot features are most risky for children?

Named features in the consultation:

- a) The realism of interactions, including realism of content generated
- b) The personalisation of interactions
- c) How they mimic relationships (friendship)
- d) How they mimic relationships (romantic)
- e) How they mimic empathy
- f) Flattering language
- g) Features to encourage more questions/ requests (e.g. asking questions back)
- h) The ability to recall interactions across sessions
- i) The type of content generated (video, text, audio, image)
- j) Allowing children to have accounts
- k) Hallucination or false, misleading responses
- l) Ability to engage in and generate mature content (e.g. sexual / romantic roleplay)

All of the features identified in this question are risky for children. Until the government has put forward legislation that would bring all AI products in scope of existing safety duties, and companies have provided strong evidence that their products are not only safe but supportive of children's best interests, the Commissioner does not believe children under 18 should be exposed to the risk inherent in these unregulated products.

The Children's Commissioner's research reports have evidenced the high risk of harm AI models present to children when they are designed without children's interests in mind and are released without any testing for child safety. Being exposed to or the subject of sexually explicit deepfake imagery or videos²² was found to be harmful even for children who had not been victims of these crimes. In that report, children explained that knowledge of technology that is widely accessible and easy to use was enough for the children the Commissioner's spoke to as part of the research to change their behaviour in ways to try and keep themselves safe. Aside from this very extreme misuse of AI, children have separately

told the Commissioner that they have concerns about their parents' ability to distinguish what is real and what is not, and that this generational divide was impacting their ability to communicate with trusted adults about their day-to-day online lives.²³ Children called image generators "scary" in this respect, showing that they feel the technology is moving much faster than anyone around them. Both these examples demonstrate a trend among children, who are attempting to take action to keep themselves safe and well where they see responsible adults unable to do that for them.

The Commissioner's position on AI companionship is unambiguous: children should not be turning to AI systems for emotional support under any circumstances. Children's emotional needs must be met by trusted adults, by families, by schools, and where necessary by trained professionals. Normalising AI as an emotional resource for children risks crowding out the human relationships that are irreplaceable, and doing so at precisely the developmental moment when those relationships are most formative.

Beyond emotional dependency, generative AI poses specific risks that should be considered: the capacity to generate content that is precisely calibrated to a child's expressed interests and vulnerabilities; the absence of any genuine safeguarding instinct in a system whose architecture is oriented toward engagement and response; and the fundamental impossibility of a child giving meaningful informed consent to an interaction whose outputs cannot be predicted even by its developers.

The Children's Commissioner's office recognises that AI is here to stay, and that it does stand to transform parts of children's lives for the better. To get there, the Commissioner wants to see the following approach taken to level the playing field between child users and AI tools and companies:

1. The government must bring in new legislation that would bring all AI products, content and companies in scope of existing online safety regulation and UK product safety standards. This includes any new legislation the government passes that requires online services to risk assess for features that risk not just children's safety, but their wellbeing and best interests to determine if they are in scope of the minimum age of 18 duty, which has been the subject of much for this consultation response.
2. The government must introduce a new regulatory framework to support AI companies to comply with the standard of safety the Commissioner expects to see set out in the legislation described in point 1.

3. All AI companies must prove they are safe and supportive environments for children before they can be allowed to access the UK market or UK-based child users.

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

Any and every AI chatbot should be in scope of the regulatory framework the Commissioner is calling for in response to questions above.

Should AI chatbots have minimum age restrictions?

In the same way that the Commissioner is calling for a risk-based approach to determining which online services should be in scope of a minimum age duty, the Commissioner is applying same principle to determining which AI chatbots should not have minimum age restrictions: when they have proved themselves safe.

What do you think the impact would be of introducing age restrictions on AI chatbots or certain features and functions?

The Children's Commissioner thinks there would be an immediate positive impact on children's lives.

3. Enforcement and compliance

Age assurance

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

The Commissioner does not think the frequency of age checks will determine the safety of children. The quality of these age checks and the widespread implementation and enforcement of age checking duties are the issues the government should look at more closely.

What should be considered to make minimum age restrictions effective and workable?

The Commissioner recommends that the effectiveness and workability of minimum age restrictions should be measured by outcomes. If children are not able to access a site that has a minimum age of 18, then that site can be considered compliant. The Commissioner strongly recommends that the government works with the Commissioner and Ofcom to develop a monitoring framework for this.

The Commissioner notes that the UK already has an existing minimum age framework in place, which could provide the government with some lessons when designing any future age restrictions. On 25th July 2025, the duties on Part 3 (regulated user-to-user and search services) and Part 5 (services with a primary purpose to provide pornography) online service providers under the Online Safety Act 2023 were enacted. From that date, Part 5 services had to put in place Highly Effective Age Assurance (HEAA) to prevent children from accessing their site, and Part 3 services that assessed themselves to be accessible to children are required to put in place measures to prevent children from encountering harmful online content including pornography, suicide and self-harm, eating disorder content and hate content – if they assessed themselves to be a platform that presented a risk to children encountering that content. Children should now be unable to access pornography websites, and other online platforms children use should never expose them to pornographic content. This is an age-based restriction that provides the UK with a lot of learning in terms of the design of a restriction and what enforcement challenges such a restriction might present.

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

The Commissioner's view is expressed above in our response to earlier questions on this point.

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

The Commissioner notes that the effectiveness of age assurance can be measured quite simply: can children access it or not? Improving the information authorities have on the prevalence of circumvention, but also the degree of compliance in the technology sector, will provide the information needed to determine how it can be made more effective, and if it needs to.

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

The Commissioner's views on this rests on four tests:

1. Does the technology meaningfully reduce children's exposure to harmful or age-inappropriate content and experiences, and is it resilient to circumvention? The real-world impact on children's safety is the most important measure. The gap between stated minimum age requirements and actual user populations on major platforms is significant. This should be addressed. Can children use it? Systems that are difficult to navigate, exclusionary, or require documentation that some children cannot provide risk widening inequalities and reducing effectiveness overall.
2. Is it commonly understood? There should be transparency and accountability in age verification systems, owing to the inevitable processing of personal or even biometric data that these systems inherently involve. Providers must be open about how their systems work, subject to independent evaluation, and accountable when they fall short, to ensure that children and those who advocate for them can understand how and why actions are taken.

Does the burden of effort fall in the right place? Fundamentally, the burden of protection must sit with platforms, not families. A parent or carer who has to become a technology expert simply to keep their child safe online has been failed by the regulatory system.

Circumvention of age limits

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

The most talked about circumvention method is using Virtual Private Networks (VPNs). The UK has already encountered this debate when designing restrictions of Part 5 (pornography provider) online services under the Online Safety Act.²⁴ Pornography services should not normally be accessible to children using VPNs - if it becomes the case that children can normally access pornography sites using VPNs, then that porn site's HEAA method does not meet the criteria.²⁵ Should a minimum age limit be introduced, there will inevitably be a fraction of children who attempt to circumvent measures using VPNs. This does not mean that the effectiveness of that restriction is undermined, it just means that platforms and regulators need to work in concert to keep in step with them.

Early evidence from the Children's Commissioner's office shows that children are succeeding in accessing pornography despite the introduction of Highly Effective Age Assurance in the summer of 2025. The Children's Commissioner's office carried out nationally representative polling of UK children aged 13 to 17 in April 2026, exploring whether they had tried to access pornography websites in the last three months (February - April 2026). The majority of respondents reported not trying. 4% reported that they had tried, with a further 1% replying I don't know and 4% I don't want to say. Those who responded "yes" were asked if they had been successful in accessing pornography websites in the last three months. Given how few children said they had tried, the numbers are too small to be reliably reported. They nonetheless confirm that at least some children are still succeeding in accessing online pornography, despite safeguards to prevent this.

VPNs are not the only measure children will use to circumvent rules – children will use other creative means like using login details from older peers. The potential for circumvention of online rules is as wide and varied as the potential for circumvention of offline rules, but the possibility that they will be challenged should not prevent a considered rollout of rules.

To reduce the circumvention of online safety rules in the UK, should the government prioritise a. more education for children and/or b. restricting children's access to VPNs?

None of the above. The Commissioner does not believe that responsibility for keeping children off sites they shouldn't be accessing sits with anyone other than technology companies, and the relevant government bodies who stand to oversee and enforce these rules.

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"

The Commissioner regards age checks at VPN level are unnecessary unless the VPN service itself finds that it presents risks on its own platform when it carries out the risk assessment the Commissioner is calling for all services accessible to children to have to complete, described in answer to questions above.

Companies who have the responsibility to implement a minimum age on their services are able to determine, using the data they gather from users on their platforms, if a user is likely to be using a VPN (which largely route user's location to a single IP address in a stated nation) and if a user is likely to be a child. It would be the platforms' legal responsibility to keep children off their sites because of the risks present on those specific sites, rather than risks present on a VPN service. It is therefore the platforms' responsibility to monitor the age of the users on their services.

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

The Commissioner does not think there are any impacts of note.

What should be considered to make age-restricting VPNs effective and workable?

The Commissioner does not support making age-restricting VPNs, unless the VPN service carries out a risk assessment that renders a minimum age of 18 necessary according to the criteria set out above.

The Commissioner supports outcomes-based assessments of effectiveness and workability, and would suggest the model described above.

Mobile phones in schools

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.

The Commissioner somewhat agrees with the statement.

What impacts would there be if this guidance was made statutory and why?

There is no good educational reason to have mobile phones in schools, and the Commissioner is satisfied that reasonable adjustments for in-school use (for instance, the tracking of blood sugar for diabetics) would be covered under the reasonable adjustments duty for schools set out under Section 20 of the Equality Act 2010.

For reasons set out in our response to earlier questions in this consultation, the Commissioner’s position is that phones being banned during the school day would have positive outcomes in terms of staff relationships with children, school behaviour, and ability to focus in lessons. However, to ensure parental consent for phone bans, the ability of pupils, especially those in rural areas or who might have mobility needs, to organise transport to and from school will need to be maintained and factored into any proposed ban.

Are there specific circumstances where you think children should be permitted to have or use a mobile phone during the school day?

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

The Children's Commissioner has found that the majority of schools are implementing mobile phone policies in line with the recommendations in the Department for Education's previous non-statutory guidance: 99.8% of primary schools and 90% of secondary schools had a mobile phone policy that limited pupils' use of their mobile phones during the school day.²⁶ Many schools made exceptions to their policies for children who needed to access their phones during the school day. Primary schools were less likely to make exceptions; almost three quarters (74%) of primary schools did not make any exceptions to their policy for certain groups of children, compared to just one in three (34%) secondary schools. Medical needs were the most common reason for schools making exceptions to their mobile phone policies. Nearly half of secondary schools made exceptions for children with medical needs (49%).²⁷

The Commissioner notes that children with medical needs should be allowed to use mobile phones where their use is required to manage their condition. As referenced above, it feels likely that such an accommodation would be required under the terms of the reasonable adjustment duty made in the Equality Act. The Government should, as part of proposed statutory guidance, include a list of conditions that would be allowed to use mobile phones to manage them. This would allow for the Secretary of State to regularly update the guidance as and when it was appropriate to do so based on technological advances.

In answer to the specific circumstances b-e (inclusive) described in this consultation question, the Commissioner does not believe that these are areas where using a mobile phone is useful, or where appropriate other approaches cannot be found (such as school-supplied assistive technology, or a pastoral response to young carers). For circumstance f, this will be a key element of securing parental consent for phone bans, especially in rural areas, where public transport is less frequent or may not adequately cover a particular area. This is reflected in data showing that children in rural areas complete most journeys to and from school by car. Any restriction that does not allow for the possession and use of phones before and after school to arrange transport will likely face highly understandable parental opposition.

4. Preparing children for a digital future

Media and digital literacy

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

Areas named in the consultation:

- a) Managing screen time and online habits**
- b) Spotting adverts, sponsored posts or AI generated content**
- c) Keeping personal information private**
- d) Online behaviour and experiences (bullying, respect, comparison or peer pressure)**
- e) Checking if information is true**
- f) Understanding how social media works (for example, 'likes' or algorithms)**
- g) Staying safe online (including how to have conversations about online safety)**
- h) Reporting harmful or upsetting content i. Knowing which apps or sites are right for their age**

The most important factor is the simple limiting of screen time. Everything else is within the power of technology companies to solve, and they must be compelled to do so.

Outside of schools, how could the UK government better support children and young people to stay safe and feel supported online?

Interventions named in the consultation:

- a. By providing clear guidance that children can use on their own**
-

- b. By supporting parents and carers to support children online**
- c. By working with online platforms and services that children already use**
- d. By supporting youth organisations and community groups to help children online**
- e. By making help or advice easy to access when something goes wrong online**
- f. By involving children and young people in designing support**

The single most effective thing the UK government could do to better support children and young people to stay safe and feel supported online would be to ensure that full and robust implementation and enforcement of all online safety legislation is expedited, and that the UK develops a regulatory framework that proactively protects children online.

The Commissioner views educational intervention as complementary but not the pillar of good digital wellbeing for children. It is not right to teach children that they need to arm themselves against a litany of online harms, if there is no action being taken to meaningfully reduce those harms at their source.

What types of support would help children with additional needs stay safe online and build digital skills?

- i. Clear, simple information using plain language**
- ii. Content adapted for different ages, abilities or needs**
- iii. Visual, audio or interactive formats**
- iv. Support delivered through trusted local or community services**
- v. Flexible or on-demand support that can be accessed when needed**
- vi. Support that helps parents or carers guide children online**

While the Commissioner represents all children in England, this is a highly technical question that should be answered in conjunction with disability and SEN experts, and our firm guidance is that the government should seek out and prioritise responses there.

Promoting high quality content

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

- a. Government**
- b. Online platform trust and safety teams**
- c. Parents, carers or trusted adults**
- d. Children**
- e. Developmental experts**
- f. Educators**
- g. Youth workers**
- h. Child advocacy charities and organisations**

The government should listen to all relevant stakeholders named in this consultation question.

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

Actions named in the consultation:

- a. Develop best practice principles for industry**
 - b. Develop guidance for parents and carers**
 - c. Develop guidance for children**
 - d. Reviewing international approaches**
 - e. Industry voluntarily promoting high quality content for children**
-

All of the above answers are voluntary, and rely on the goodwill of the private sector to protect and promote the rights and wellbeing of England's children, as put explicitly in option e. It is unclear why an industry would do this over prioritising profit.

5. Supporting families

Parental controls

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

Somewhat agree. The Commissioner recognises that parents have a role in supporting children to be safe and well in all areas of their lives, including online and offline environments. It is right that parents feel involved in their children’s lives, and children themselves have stated that supportive conversations about online safety are helpful in helping them feel empowered online. However, the Commissioner notes the power imbalance tipped in favour of companies making decisions to design products that children want and sometimes need to use, and parents, who cannot always be there to protect their children from online harms. Parents should not be used by government to provide the protection for children that can and should be given by government and online service providers.

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

The Commissioner has expressed throughout this consultation that age alone does not delineate risk level.

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

The Commissioner cannot provide information on this point.

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