

Chapter 1 covers questions related to the following topic:

- Understanding how children use technology
- What are the benefits of social media use, and being online, for children?
- Social media and other digital services support a wide range of activities, including creative expression, social connection, academic development, and civic engagement. In addition, these services offer essential tools that educators and parents rely on to support children's healthy development and to facilitate parent engagement with extracurricular activities, such as sports clubs.
- What are the harms or risks of social media use, and being online, for children?
- As children spend more time on social media platforms, they can encounter harms, including unsafe interactions, inappropriate content, and engagement practices designed to maximise time spent online that can have addictive outcomes. At the same time, many parents have reported facing challenges in effectively supervising their children online.
- Do you think the benefits of children using social media, and being online, outweigh the risks, or the other way around?
- Policymakers should undertake targeted efforts that address specific harms and empower parents with meaningful controls. However, many current online safety proposals impose overly broad prohibitions on digital services, including blanket age-based bans on social media use and algorithmic feed restrictions, that fail to account for the diversity of online experiences and the many ways children and families use digital platforms. Treating all social media use as inherently harmful risks limiting these beneficial uses and impeding digital literacy and children's equitable participation in the digital environment. Broad restrictions, such as screen time limits, algorithmic feed bans, or blanket age bans, also do not address the specific features and practices that drive harmful outcomes online. In order to better balance protecting children online with enabling age-appropriate access to beneficial content and services, policymakers should prioritise targeted, risk-based legislation that focuses on known harms, unsafe interactions, and excessive engagement practices. An approach that emphasises transparency, empowers parents with meaningful controls, and holds bad actors accountable for demonstrably harmful practices can reduce the risk of harmful outcomes without denying opportunities to develop digital literacy or participate in online communities.

Chapter 2: Interventions for safer, more positive experiences

- There is no current legal requirement for social media services to have a minimum age of access, though many services set their minimum age policy at 13. A minimum age of access for a social media service would equate to a ban for anyone younger than the minimum age. Would you support a legal requirement for social media services to have a minimum age of access?
 - y/n/don't know

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

- At what age do you think the age of digital consent in the UK should be set for information society services?
 - 13, 14, 15, 16, don't know, other

- 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.*

- 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.*

- 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"***
 - Strongly agree/disagree/etc

- 'Functionality' refers to a feature of a service which enables interactions or actions between its users. This includes a range of capabilities that services offer. Some online services allow their users to engage with the following functionalities. Do you think these functionalities should be age restricted so that children below a certain age cannot engage with them? (Please select all that apply)

- Live streaming, ability to send nude images or videos, disappearing content, location sharing, connecting or talking to strangers, don't know, none of the above, other
- To what extent do you agree or disagree with the following statement: ***"Restricting children's access to these features/functionalities, would provide for a safer online experience for children"***
Features/functionalities include live streaming, the ability to send nude images or videos, disappearing content, location sharing and connecting or talking to strangers.
 - Strongly agree/disagree/etc
- 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.*
- The following design features are sometimes known as 'persuasive', meaning they may encourage children to stay online for longer. From the following list, please select the ones you think are particularly 'persuasive' to children: (Please select all that apply)
 - Infinite scrolling, autoplay, affirmation features ('likes', comments), alerts and push notifications, content recommendation algorithms, don't know, none of the above, other
- Which of these features do you think should be age restricted? (Please select all that apply)
 - (same as above)
- Would you support the following restrictions for children's access to online services?
 - Daily screen time limits for individual apps, restricting overnight access for individual apps, both, neither, don't know
- 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.*
- What factors are important when determining which apps, sites or services to apply **minimum age of access restrictions** to? *For example, user-*

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

- Are there any types of apps, sites or services that you want to be captured by **minimum age of access restrictions**?
- What factors are important when determining which apps, sites or services to apply **age-restrictions on specific features and functionalities**? *For example, user-to-user interaction, the ability to post material, persuasive design features, risky functionalities, the ability to generate non-text mediums such as video or images, the target age group, the size of the service.*
- Are there any types of apps, sites or services that you want to be captured by **age-restrictions to features/ functionalities**?
- Some services are already exempt from the Online Safety Act. Examples include internal business services, services with limited functionalities and services provided by persons providing education or childcare. Are there additional types of service which you think would be appropriate to exempt from age restrictions? *These might include services whose primary purpose is delivery of educational content, services that offer specific child or teen accounts or versions, or services which offer parental controls.*
- An AI chatbot is an artificial intelligence system that can replicate human-like conversations with users. They can generate images, videos, text or audio in response to 'prompts' from users in real time. They may also remember context and personalise responses to individual users. These services can draw from a variety of datasets including live search results and large language models. AI chatbots can be standalone services or embedded within another service. Examples of this include ChatGPT (standalone) or embedded within services, such as Grok (within X).
What are the benefits to children of using AI chatbots?
For example, this might include as a search function, for educational purposes, for creativity.
- Which AI chatbot features are most risky for children?
(Please select all that apply)
 - Realism of interactions, personalization of interactions, how they mimic friendships, romantic relationships, how they mimic empathy, flattering language, features to encourage more questions/requests, ability to recall interactions across sessions,

the type of content generated, allowing children to have accounts, hallucination or false/misleading responses, ability to engage in/generate mature content, don't know, none of the above, other

- Which functionalities of AI chatbots should minimum age restrictions apply to?
- Should AI chatbots have minimum age restrictions?
 - y/n
 - Please explain the reasoning
- 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.*

Chapter 3: Enforcement and compliance

Age assurance

If online minimum age restrictions were to be introduced, services in scope would need to prove that their users were above the required age. Age assurance methods include, but are not limited to, facial age estimation, photo ID matching, AI and biometric based systems, and age inference (where AI predicts age based on online behaviour).

- To what extent do you agree or disagree with the following statement: ***“Adults should complete age checks more often, if it means children are safer online”***
 - Strongly agree/disagree/etc
- 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.

Online services have a range of age assurance options that operate on a sliding scale of accuracy. The more accurate forms of assurance also generally present the greatest risks because they require more sensitive personal information to produce more accurate identification. As a result, standard practice is to use less intrusive forms of age assurance, like age estimation or inference, as a means of restricting access to content or services that themselves present lower levels of age-related risk. Accordingly, services that use these methods can limit users' access to sensitive content while providing more age-appropriate experiences for children or teens under a threshold age.

Unfortunately, some stakeholders have suggested using the most privacy intrusive form of assurance—age verification—as a means of restricting access to all content available on a given platform or app store. This construct poses unnecessary risks to privacy in order to limit access to content that may present no foreseeable age-related risks in addition to sensitive materials. Mitigating online harms requires more than a one-size-fits-all prohibition on access to a combination of harmful and benign content and instead must involve consensus standards and best practices around notification and gamification based on age-related risks.

Broad age verification mandates should be avoided because they would generally require collection and storage of government-issued identification, creating highly valuable targets for misuse or breach and exposing consumers to increased risks related to the loss or exploitation of their personal information. They would also normalise the expectation that individuals must trade their personal information for basic access to digital services and creates incentives for expanded data collection across the digital ecosystem.

- 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.

- ACT urges policymakers to consider that small and medium-sized enterprises (SMEs) operating online services, and in particular startups and scaleups, have limited staff and resources to comply with new requirements in comparison to their larger counterparts. Even if requirements are written to put new burdens on large platforms, the SMEs that use those platforms will still have to undertake some degree of new product engineering to comply. Increased costs can put compliance out of reach for lower-resourced firms, meaning that firms in other countries may avoid the UK market and firms within the UK may not compete at all. In addition, the vast majority of apps on the major app stores do not pose any particular risk to

children, use children's data for anything, or even know whether any of their individual users are children. Requiring them to undertake certain age assurance measures could have the unintended effect of significantly expanding the number of entities collecting and cataloguing children's data, which is directly opposed to the goal of improving children's privacy online.

- How, if at all, could age assurance be made more effective?
- What should be considered when assessing the effectiveness of age-verification and age-assurance technologies?
- Virtual Private Networks (VPNs) are tools that create a secure private connection between your device and the internet. They are used for several purposes, such as protecting sensitive communications and protecting privacy, including in a corporate context.

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

- Which of the options below do you think the government should prioritise to reduce circumvention of online safety rules in the UK? (Please select the most important one to you)
 - More education for children, restricting children's access to VPNs, none of the above, don't know, other
- To what extent do you agree or disagree with the following statement:
"Everyone should go through age checks to access a VPN if it would prevent children using them"
Strongly agree/disagree/etc
- What do you think the impacts would be if VPNs were age-restricted?
- VPNs can be an important privacy tool so government must engage with communities of vulnerable young people to see how they use VPNs and what impact their removal could have on their safety.
For example, impacts on the safety and wellbeing of children, or the impact for parents and carers, as well as other users. You could also comment on the impact on all users' privacy and data or on business costs, revenue, and innovation.
- What should be considered to make age-restricting VPNs effective and workable?

For example, public trust and engagement with increased age assurance requirements, accessibility of age assurance methods and variations of age assurance approaches across services, interaction with legitimate uses of VPNs.

- In February 2026, the Department for Education (DfE) updated the guidance on mobile phones in schools and stipulated that all schools should be mobile phone-free environments by default unless there is a good reason for phones to be in use.

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

“To address some of the challenges schools face with mobile phones, the Department for Education’s (DfE) non-statutory guidance on ‘mobile phones in schools’ should be made statutory.”

This would mean schools have a legal duty to follow the guidance, which explains to individual schools and trusts how to implement a policy that prohibits the use of mobile phones throughout the school day, unless they have good reasons not to. This includes during lessons, the time between lessons, breaktimes and lunchtime.

- Strongly agree/disagree/etc
- 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.
- Are there specific circumstances where you think children should be permitted to have or use a mobile phone during the school day?
(Please select all that apply)
 - Medical needs, special educational needs/SEND reqs, individual safeguarding concerns, caring responsibilities, educational or learning purposes, travel to and from school, don’t know, none of the above (ban phones), none of the above (always allow phones), other

Chapter 4: Preparing children for a digital future

- **Media literacy** is about understanding, questioning, and making sense of the content you see online. It helps children tell the difference between fact and opinion, check sources and assess their trustworthiness, and recognise how online content can affect thoughts, feelings and behaviour.
Digital literacy means having the practical skills to use devices and online services safely, confidently and independently. This includes knowing how to set up and use devices, recognising scams, protecting personal information, and managing everyday digital tasks.

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

(Please select all that apply)

- Managing screen time and online habits, spotting adverts, sponsored posts or AI gen content, keeping personal information private, online behavior and experiences (bullying etc), checking if information is true, understanding how social media works, staying safe online, reporting harmful or upsetting content, knowing which apps or sites are right for their age, don't know, none of the above, other

- Where, if anywhere, would you like to see more support available in the future?

This could include places you already use but don't offer support and you would like them to, or places that could offer more support with help from government or others.

(Please select all that apply)

- Schools or childcare settings, community or youth spaces, parent or carer groups or networks, public services, faith or cultural groups, non-gov online sources, gov websites, don't know, none of the above, other

- 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)

- Lots of stuff everyone will say yes to

- 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)

- Lots of stuff everyone will say yes to

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

(Please select all that apply)

- Gov, online platform trust and safety teams, parents, children, development experts, educators, youth workers, child advocates, don't know, none of the above, other

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

(Please select all that apply)

- Develop best practices for industry, develop guidance for parents, develop guidance for children, reviewing international approaches, industry voluntary promotion, don't know, none of the above, other
- 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.

Chapter 5: Supporting families

- Many online platforms provide parental control tools which allow parents and carers to oversee and place parameters around children's online activity, including content, time and functionality-based restrictions.
To what extent do you agree or disagree with the following statement:
"Parents should have control over the online experiences of their children"
 - Strongly agree/disagree/etc
 - Explain the reasoning behind your answer
- As policymakers develop online safety legislation, they should prioritise approaches that place parents in control of their children's digital experiences. Rather than broad mandates, the focus should be on policies that would enable parents to better monitor and manage their children's digital engagement by enabling them to consent to sharing age-related information and allow access to age-appropriate content. Relying on self-reported age signals would eliminate many of the privacy and security concerns with mandatory age assurance, as would limiting age assessment requirements to apps that offer differentiated experiences for adults and minors or that are intended for adults only. This approach enables parents to restrict access to inappropriate apps without imposing costly compliance burdens on developers whose services pose no risks to children. Policymakers should also provide relevant agencies with sufficient resources to educate parents about existing parental controls and promote digital literacy. Parents already have access to a variety of tools to manage screen time, limit access to specific apps or content, restrict communications, and set device-use schedules. However, awareness and adoption of these tools remain low. In a 2025 study, the Family Online Safety Institute surveyed parents in the United States and found that parental control adoption rates ranged from 51 percent on tablets to 35 percent on video game consoles.¹ Improving public awareness and understanding

¹ "Connected and Protected: Insights from FOSI's 2025 Online Safety Survey." *Family Online Safety Institute*, 28 May 2025, fosi.org/research/connected-and-protected-insights-from-fosis-2025-online-safety-survey/.

of these tools will empower parents to better protect their children online without imposing broad mandates that impede children's digital access or digital literacy education.

- How should this level of control change for children of different ages?
For example, a 16-year-old and an 11-year-old.
- What would help parents and carers to more effectively use parental controls? **As mentioned previously**, policymakers should also provide relevant agencies with sufficient resources to educate parents about existing parental controls and promote digital literacy. Parents already have access to a variety of tools to manage screen time, limit access to specific apps or content, restrict communications, and set device-use schedules. However, awareness and adoption of these tools remain low. In a 2025 study, the Family Online Safety Institute surveyed parents in the United States and found that parental control adoption rates ranged from 51 percent on tablets to 35 percent on video game consoles.² Improving public awareness and understanding of these tools will empower parents to better protect their children online without imposing broad mandates that impede children's digital access or digital literacy education.
- *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.*

² "Connected and Protected: Insights from FOSI's 2025 Online Safety Survey." *Family Online Safety Institute*, 28 May 2025, fosi.org/research/connected-and-protected-insights-from-fosis-2025-online-safety-survey/.