

Aberlour is the largest solely Scottish children's charity. Delivering more than fifty services, we work with children, young people and families, providing services and support in communities across Scotland.

We work with families to overcome the challenges they face, such as the impact of drugs and alcohol, growing up in and leaving care, poor mental health, living with a disability, experience of domestic abuse or the impact of poverty and disadvantage.

We offer compassionate support to families and support them in their journey to heal and grow.

INTRODUCTION

Aberlour places the safety, wellbeing and human rights of children at the heart of its practice. Central to this is to ensure that children and young people are safeguarded, in both the physical and online world. The context of the digital environment is rapidly changing and Aberlour is committed to keeping pace and responding to these changes.

Aberlour maintains rigorous organisational policies to support children, young people and families to navigate the digital environment safely and reduce risk of harm. Our approach focuses on building resilience, avoiding blanket bans, and empowering children and families to use parental controls and supervision.

We believe that outright bans on technology use are ineffective and may increase risk by driving behaviour underground. We advocate for education, regulation of technology companies, and open conversations with our young people as more effective approaches. These principles are embedded in Article 17 of the UNCRC, which tells us children should be empowered by knowledge and skills to keep themselves safe in a digital world.

In response to this consultation, we have chosen to respond only to questions where we can provide insight from our organisational experience and knowledge or where we can reflect the views of children, young people and families we support. In preparing our response we have engaged with and reflected the views and experiences of children and young people supported by some of our community based and residential children's services

CHAPTER 1: UNDERSTANDING HOW CHILDREN USE TECHNOLOGY

WHAT ARE THE BENEFITS OF SOCIAL MEDIA USE, AND BEING ONLINE, FOR CHILDREN?

At Aberlour, we support and promote the safe use of technology with children, young people and families. The online environment is part of our everyday lives for work, learning, information, socialising and leisure activities. It can make a positive contribution

to children's lives, providing information and resources, connection with friends and communities.

Communities are created within online platforms allowing people with similar interests and activities to easily interact, for example, online gaming. These communities can involve children and young people and can create a sense of acceptance, belonging and rapport.

The principles that underpin our social media use policies are embedded in the United Nations' Convention of the Rights of the Child (UNCRC), incorporated into Scots' Law in 2024, which we will reference throughout. Article 17 of the UNCRC tells us children should be empowered by knowledge and skills to keep themselves safe in a digital world.

Furthermore, the UNCRC General Comment No. 25 on children's rights in relation to the digital environment emphasises the importance of digital inclusion, stating that all children should have equal and effective access to the digital environment in ways that are meaningful for them. It also highlights the need to consider each child's age and stage of development when designing measures to protect children in, or facilitate their access to, the online environment.

WHAT ARE THE HARMS OR RISKS OF SOCIAL MEDIA USE, AND BEING ONLINE, FOR CHILDREN?

There is inappropriate content available in online environments which can cause a risk of harm to children, young people and adults that we work with. This includes content which is sexual in nature (i.e. pornography, nude images and sexual language), violent, threatening or disturbing images and content, as well as content which is intended to mislead or misinform. Algorithms tend to favour controversial content by design. Often, children and young people are forced into seeing harmful content without ever searching for it. Algorithms add to the addictive nature of social media, as well as many other features such as infinite scrolling. Combined, this creates an online environment that is constantly being fed with harmful content. For example, content around self-harm or suicide ideation has become normalised on social media, to the extent that such content can become part of the child's worldview.

Another significant risk is how people behave online. This can be how the people we support behave or present themselves online and / or how other people's conduct can impact negatively on the people we support. Conduct of either party may involve sharing indecent material, misrepresentation of self, bullying, hate speech, grooming, blackmail and coercive control.

Contact between people online can also be the source of risk. We need to consider and understand the dynamics between the people we support and people they talk to in the digital space. This differs to connections formed in the physical world as there are often challenges in authenticating who you are connecting with online and there can be people with harmful motives, for example, those who seek to manipulate, exploit or intimidate.

The commercial world uses online platforms to market and advertise their products and services. Children and young people can be the target audience for these campaigns,

which increases risks. For example, images of celebrities and their lifestyles can lead to unrealistic standards of beauty and wealth, which can create issues for children around body image, mental health and sexualisation. Children and young people, and in turn their parents/ carers, can face pressure to keep up financially with the latest trends. Many online platforms promote games with in-app purchasing options and sexualised advertising can be featured in many of the apps and platforms that children regularly engage with.

We recognise that toxic masculinity is on the rise and its ideas are spread through online platforms. Research by Vodafone found that 69% of boys aged 11-14 have been exposed to content promoting misogyny. 59% of the boys came across this content through innocent searches, driven by the algorithm of the social media app itself.¹ Further research has found that 1 in 5 men aged 16-29 think favourably of Andrew Tate, the controversial social media influencer.²

Aberlour delivers a local programme of work in Falkirk for high school aged boys to provide a safe space for them to talk about their worldviews and to develop a deeper understanding of gender-based violence. The programme looks to change behaviour and encourage boys to challenge others. This is the type of work that can more meaningfully combat the harms of social media than an outright ban might achieve, building resilience and encourages self-reflection and improvement. When asked if they noticed a change within themselves, one boy fed back, ***“Yes because I have learnt so much, I think I am a better person.”***

While we recognise the positive impact online communities can have on children and young people, we also understand that established communities can accelerate the process of grooming, leading to exploitation.

While developing our social media and digital use policies, our young people told us:

“Don’t just tell us ‘not to do it’. We’re teenagers, of course we are going to look at mad stuff. Maybe, I don’t know, try give us ideas on how to handle what we are seeing.”

“You’ll never know about every app, there are new ones all the time. Things change. You’ve got to trust us.”

“You could check the young person’s phone with them. Sit with them and explain why you are doing it, don’t be shady and do it when they’re not around.”

¹ [AI ‘Aggro-rithms’ target boys with harmful content within 60s](#)

² [Masculinity and women’s equality: study finds emerging gender divide in young people’s attitudes | Ipsos](#)

DO YOU THINK THE BENEFITS OF CHILDREN USING SOCIAL MEDIA, AND BEING ONLINE, OUTWEIGH THE RISKS, OR THE OTHER WAY AROUND?

- Benefits strongly outweigh the risks
- Benefits somewhat outweigh the risks
- Benefits and risks are roughly equal
- Risks somewhat outweigh the benefits
- Risks strongly outweigh the benefits
- Don't know / Prefer not to answer

CHAPTER 2: INTERVENTIONS FOR SAFER, MORE POSITIVE EXPERIENCES

WOULD YOU SUPPORT A LEGAL REQUIREMENT FOR SOCIAL MEDIA SERVICES TO HAVE A MINIMUM AGE OF ACCESS?

- Yes
- No
- Don't know/Prefer not to answer

**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"**

- Strongly agree
- Somewhat agree
- Neither agree nor disagree
- Somewhat disagree
- Strongly disagree
- Don't know/ Prefer not to answer

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.

It is important when we are assessing risks in the digital space and constructing plans to safeguard children and young people that we also are seeking to promote digital resilience. Evidence suggests that where there are risks for young people in the digital world that this can lead to interventions which prohibit or limit the young person's access to online spaces, particularly for children with vulnerabilities. However, this leads to

children who are at highest risk of online harms having fewer opportunities to learn how to keep themselves safe online. It can also increase risks as children may be worried to tell adults if they are experiencing difficulties online, in case they get in trouble or have their devices/access removed.

In December 2025, the Australian government implemented The Online Safety Act (Social Media Minimum Age) Bill, effectively banning social media access for under-16s. The [evidence](#) remains inconclusive on whether this measure is succeeding in protecting young people from online risks and pressures.³ Studies have shown that it is resulting in a lack of visibility and monitoring of children and young people's online activity, making it more difficult to keep them safe and reduce online harms. For example, research by [YouGov](#) found that 27% of parents noted a shift to alternative or less regulated platforms.⁴ 25% observed reduced social connection, creativity or peer support online. Other [research](#) has reached similar conclusions, for example: "They often don't eliminate the behaviour, they redistribute it – to workarounds, substitutes, and less visible spaces."⁵

A major University of Adelaide [study](#) had found that the relationship between social media use and mental wellbeing was complex, varying by age and sex.⁶ The data points to moderate use being most beneficial, with abstinence and excessive use both being problematic. In the wake of the ban in Australia, Kids Helpline [reported](#) an increase in young people calling specifically with concerns about the restrictions, including those experiencing learning difficulties, mental health concerns and social isolation.⁷ The young people cited loss of communities online, learning opportunities and activities to manage anxiety.

It has also been [shown](#) that young people's access to news in Australia is negatively impacted, and falls hardest on those whose news diets were already most limited.⁸

This is a common theme from evaluations of similar approaches around the world. South Korea's shutdown, China's under-18 online gaming regulations, the Children's Online Privacy Protection Act (COPPA) in the US and attempts to block ChatGPT in New York schools have all fallen short of their intended outcomes.

Like all other life skills, children and young people learn by doing and it takes time to develop these skills. At Aberlour, our staff support children, young people and their parents and carers to take a strengths-based approach to balance risk and resilience.

The skills and qualities staff routinely use in their daily work with children, young people and families include supporting them to stay safe online: whilst technical solutions may apply to ensure digital services and content provided to children are appropriate for their

³ [Australia's Social Media Age Restriction: A Comparative Analysis of International Approaches and Bioecological Systems Impacts](#)

⁴ [New YouGov research shows cautious optimism as Australians assess impact of under-16 social media ban](#)

⁵ [Australia's under-16 social media ban won't change the reality of growing up online | Pursuit](#)

⁶ [Social Media Use and Well-being across Adolescent Development](#)

⁷ ['Distressed' teens turn to Kids Helpline following social media ban, saying they've lost support networks | The West Australian](#)

⁸ [Social media ban: the impact on young people's news engagement](#)

age and stage of development, and our knowledge needs to be kept up to date, by far the most important skill is the ability to form relationships of trust, to be non-judgemental and empathetic and to remain curious about the lives and experiences of those who we support. In doing this, we can best support our children and young people to stay safe online.

This question asks for views on all impacts, including business costs and revenue. We wish to highlight that, as stated in Article 3 of the UNCRC, the safety and wellbeing of children are paramount and take precedence over all other considerations.

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.

As already described, we would have concerns around limiting children and young people's ability to build digital resilience. This approach could also disrupt access to services such as Childline and other private channels, where young people can healthily manage their mental health and connect with others.

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.

In conversation with some of the young people we support, a range of viewpoints were expressed on this matter.

The young people from one of our residential services agreed that if social media was banned for under 16s then they would still find a way to use it and it would not work, no matter how the government tried. The current age restrictions for social media apps surprised them, as they didn't realise there were any. Upon finding that out they said it absolutely does not stop young people from using it. One young person said they had Facebook by 11 years old.

One said she would be sleeping if she wasn't on social media, and another said she would be going out more with friends. One spoke of the detrimental impact on her mental health of receiving negative comments on the videos she posts. However, it also allows her to connect with friends, create videos and explore new interests, such as Korean culture. One mentioned that improving ways of blocking features would be a positive step: ***"It's different for everyone, it should be individualised!"***

Young people supported by our [Guardianship Scotland](#) service, Scotland's national child trafficking support service, were more critical of the role that social media and particular

features have in shaping young people's views of the world.⁹ Both young people said that there should be a ban for under 16s to use social media and were concerned about the rise in racism and how algorithms disperse hateful content, particularly to impressionable children and young people. They wondered why there was not more widespread use of sites adapted specifically for children, such as YouTube Kids, to more effectively limit exposure to harmful content.

They believe that what can be posted on TikTok and promoted on FYP (For You Page) should be restricted. Violent videos have been shown there with no restriction and the more popular it becomes, the more likely it appears on children's screens. One example of this was Charlie Kirk's assassination.

The diverse range of perspectives we gathered from even a relatively small sample size demonstrates how important it is to work with each young person as an individual and maintain open conversations. While Aberlour's own view is not an outright prohibition on social media platforms, it is vital to understand and respond to the wide range of views that children and young people have on this issue.

WHAT ARE THE BENEFITS TO CHILDREN OF USING AI CHATBOTS?

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

The young people from one of our residential services spoke about the benefits of using AI mostly for school or college assignments, where it is encouraged. One young person feels it is particularly useful for science.

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.

Again, we would stress that there should be no consideration higher than the safety and wellbeing of children, in line with the UNCRC.

We also believe that Article 17 of the UNCRC is clear that information and knowledge is power for children and young people. If they are not properly equipped with experience and guidance on using digital technologies, their rights are not being fully realised. This is why at Aberlour we believe in building digital resilience, and that it should be incumbent on the technology companies to ensure their platforms promote the safety and wellbeing of children.

In applying UNCRC General Comment No. 25 in this context, it is also essential that we respect the individual and evolving competencies of each young person when assessing their level of access to the digital environment. Any restrictions should also be informed by the latest research, from across a range of disciplines.

⁹ [Aberlour | Guardianship Scotland: National Child Trafficking Support Service](#)

CHAPTER 3: ENFORCEMENT AND COMPLIANCE

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.

Despite differing views from the young people we spoke to on the benefits and risks of social media use, a common theme was the difficulty posed in trying to enforce age restrictions. All felt that the current approach was not effective. Even when users openly comment about being younger than the minimum age, nothing is done about it. This again demonstrates that social media companies must do more to fulfil their duties to provide safer online environments.

The young people supported by our Guardianship Scotland service also said that they do not trust face recognition tools to determine age. They feel it does not always work and also have concerns about how their images are stored.

The young people have experiences of using share codes to prove their right to work and believe this could be a better way to prove your age. If the Government knows who you are and has your age information stored, then sharing a code is preferable to sharing your confidential personal information directly with a private company. They would trust this approach more than sharing passport or other IDs, or face ID. Another consideration is that some of our young people often do not have relevant ID due to their circumstances. Our Unaccompanied Children and Young People will be engaging with the University of Brighton's research, 'The role of digital technology in social networks and wellbeing of unaccompanied young refugees' which is a survey across the UK. We would be glad to provide feedback to the Government following this research on the specific needs of asylum-seeking young people when it comes to digital technology.

We believe that setting a legal age of access to social media to 16 will only create more unauthorised and uncontrolled use of social media, which creates greater risks for our young people. It should be incumbent on social media companies to ensure that their software and security promote the safety and wellbeing of children and improves parental and carer involvement and oversight.

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
- Other (please specify)
- Don't know/ Prefer not to answer

As our conversations with our young people demonstrate, there will always be ways around online safety rules. New platforms will be created. Legislation and restrictions thus far have failed to keep pace with technological advances. This means that, alongside working with young people to build their digital resilience, the approach must prioritise enforcing the legal duties of technology companies, and indeed incentivising them, to create and maintain environments that are safe for children to participate in. There should be substantial penalties when companies fail to do this.

CHAPTER 4: PREPARING CHILDREN FOR A DIGITAL FUTURE

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)

- By providing clear guidance that children can use on their own
- By supporting parents and carers to support children online
- By working with online platforms and services that children already use
- By supporting youth organisations and community groups to help children online
- By making help or advice easy to access when something goes wrong online
- By involving children and young people in designing support

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)

- Clear, simple information using plain language
- Content adapted for different ages, abilities or needs
- Visual, audio or interactive formats
- Support delivered through trusted local or community services
- Flexible or on-demand support that can be accessed when needed
- Support that helps parents or carers guide children online
- Other (please specify):

Ensuring Representation of Vulnerable Groups: We would like to highlight the risk of excluding children with disabilities from consultation and emphasise the importance of amplifying the voices of digitally excluded or socially isolated young people, including unaccompanied asylum-seeking children.

WHAT FURTHER ACTION SHOULD BE PRIORITISED TO SUPPORT POSITIVE ONLINE SPACES FOR YOUNG PEOPLE? (PLEASE SELECT ALL THAT APPLY)

- Develop best practice principles for industry
- Develop guidance for parents and carers
- Develop guidance for children
- Reviewing international approaches
- Industry voluntarily promoting high quality content for children
- Other (please specify):

Enforcing and strengthening existing regulations per the Online Safety Act 2023: The Online Safety Act 2023 placed duties on social media companies and search services to protect their users from illegal content and content harmful to children.

Technology platforms must be held accountable for implementing effective safety measures, as is their legal duty. The burden of supporting children and young people to navigate harmful online environments should not be shifted to parents, carers and the young people themselves.

CHAPTER 5: SUPPORTING FAMILIES

**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
- Somewhat agree
- Neither agree nor disagree
- Somewhat disagree
- Strongly disagree
- Don't know/ Prefer not to answer

PLEASE EXPLAIN THE REASONING BEHIND YOUR ANSWER.

We believe we should be working with children to ensure their digital resilience is strong. With our children and young people, we do this by:

- talking
- setting controls
- thinking critically
- negotiating rules

Talking means setting up those positive relationships to ensure families feel they can trust us to help support them. Children make mistakes online, but it is important that they feel they have someone to talk to if things go wrong so we can better support them. Talking

also means making links with local partners, such as the police, who can add great value to sessions on safety.

We encourage discussions for children and young people to negotiate rules, for example, a cut off time for devices to promote healthy sleep routines or no devices at the dinner table. It is important that the adults around children model the same healthy behaviours they promote and follow the same rules that are agreed upon.

Setting controls is important for us particularly to restrict children and young people from seeing inappropriate or harmful content. Where we are caring for children and young people who live in our houses, we are responsible for making decisions about their care and support as their corporate parent. Therefore, managers and workers in these settings will assess the developmental needs of the young person to determine what technology they can access and what controls should be in place. All children and young people in our houses must have a digital safety plan in place. This can help to set expectations about safe use and be communicated with their families and social workers to ensure the plan is supported by all involved.

Aberlour IT department has controls in place for all Aberlour owned devices and Aberlour Wi-Fi networks which limits access to age-restricted sites and content. However, where young people have their own devices and mobile networks these controls may not entirely prevent access to inappropriate materials, for example when using mobile data or Wi-Fi hotspots in the community. However, we can discuss with young people, their parents and others how this is managed, and this can also be included in their safety plan. In our residential houses we set up parental controls taking into consideration the age and development stage of each individual child and young person given that not all will have the same capacity to understand information online and how to manage risks.

We recognise that controls aren't the catch all way to keep children safe - there can be ways to get round them such as using adapted codewords to avoid content being flagged by the platform's safety systems or using encrypted messaging. Children and young people can also access other people's devices or networks.

We also support children and young people in community settings, where we have little to no authority to apply controls to their devices and networks. In these cases, our role may be to support young people and their parents and carers to set controls at home. This can include the use of apps such as Google Family Link or specific controls through the household Wi-Fi carrier (e.g. Sky Shield). Our workers can direct parents and carers to more information about parental controls from the Internet Watch Foundation (IWF) and help to set them up.

What is true is that for all children and young people the adults in their lives should be able to help and support them to stay safe online and must be provided with tools to do so. Child protection is everyone's responsibility and that must apply online as well as in the real world. However, it is incumbent on government to ensure and apply safeguarding and regulatory measures to make sure the digital realm is a safe and protective space for everyone, including children and young people. It cannot be the individual responsibility of users to keep themselves safe. Developing a regulatory framework that ensures social

media platforms and technology companies are accountable for their products and services is vital to ensure children and young people can safely use digital technology, rather than to simply to exclude them from these spaces. This is the responsibility of government whose primary duty is to protect the wellbeing and rights of all children and young people and put this at the forefront of how to make the online world safe for all.

HOW SHOULD THIS LEVEL OF CONTROL CHANGE FOR CHILDREN OF DIFFERENT AGES?

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

We consider the level of control be determined by each child and young person's individual circumstances, age and level of understanding. Controls should be adjusted to promote responsibility and trust as the child gets older and builds their digital resilience. This should include the children and young people's views, as well as the people around them.

WHAT WOULD HELP PARENTS AND CARERS TO MORE EFFECTIVELY USE PARENTAL CONTROLS?

For example, more information on how to do this on purchase of a phone, help from platforms on how to set up, or greater standardisation across tools.

More effective signposting to support and information services, such as Internet Matters, would be beneficial.

For further information please contact either Rebecca.French@aberlour.org.uk or Chloe.Robertson@aberlour.org.uk