

Consultation Response:

Growing up in the online world: a national consultation

Zero Tolerance for UK Government, 19th May 2026

Questions

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

Zero Tolerance is Scotland's expert organisation on the primary prevention of men's violence against women and girls (VAWG). Primary prevention is a long-term strategy to prevent violence before it starts by addressing the root cause – gender inequality. Social media and the online world is a vital source of social, civic, and educational connection and information for children.

UNCRC General Comment No. 25 establishes that children's rights apply equally online as offline. Children have the right to access information online, and states have an obligation to facilitate, not restrict, that access. It also establishes that the best interests of the child must guide all digital policy decisions (UN Committee on the Rights of the Child, 2021).

UNICEF Innocenti's 2025 working paper on the best interests of the child in the digital environment argues that digital policy decisions must consider children's full range of rights, including rights to education, play, expression, and participation, not only protection rights (UNICEF Innocenti, 2025).

Policy which restricts children's access to online spaces without first consulting children, without examining whether adequate offline alternatives exist, and without holding platforms accountable, does not meet the best interest's standard required by international law.

Broadly, benefits of social media and being online include providing children with the ability to:

- Stay in touch with friends and family/carers
- Access news and information about their rights
- Access information on current affairs within their societal context
- Access information relating to their health and wellbeing
- Participate in activism and discussion relating to their rights and those of their peers
- Engage with educational materials
- Engage with content relating to hobbies and interests
- Learn digital skills and engage with online resources relevant to employment and studies
- Access services related to online banking
- Engage with offline experiences and resources that they may never otherwise have access to, as a result of online signposting
- Learn to navigate and safely integrate into the online world, which is realistically a part of most people's lives in the UK

In the UK, to be compatible with Article 12 of the UNCRC we must listen to and give due weight to the views of young people themselves when considering decisions which affect them (UNICEF, 2010). Furthermore, Scotland incorporated the UNCRC into domestic law through the UNCRC (Incorporation) (Scotland) Act 2024. Scottish public bodies contributing to UK Government consultations on behalf of Scotland's children therefore have legal obligations to consider children's rights in their decision-making.

The drafting of UNCRC General Comment No. 25 involved the largest ever consultation of children on digital rights: 709 young people in 28 countries. Young people consistently called for safer design, more transparency, and meaningful participation in digital policy. They did not call for bans (UN Committee on the Rights of the Child, 2021).

"A safer, fairer digital world requires systemic change. Platforms must embed safety and privacy into their design; Governments must set clear standards that uphold children's rights; and tech companies must be transparent about how

their algorithms and data systems work. And young people must be included as partners in shaping digital policy." Young participant, UN 'Our Digital World, Our Say' initiative, 2025 (UN Human Rights (OHCHR), 2025).

Similarly, Childnet's Youth Advisory Board members shared their views on social media and mental health on Safer Internet Day 2024. Young people described the benefits they value - community, self-expression, entertainment and connection - while acknowledging harms (Childnet International/Place2Be, 2024). Most importantly, they called for better platform design and digital literacy support, not removal of access. Crucially, charities, healthcare providers, governmental departments and other trusted sources of information deliver services and content for the benefit of children via social media and other online spaces. Access to this content is particularly essential in tackling misogyny, addressing gender inequalities, and preventing violence against women and girls (VAWG).

In relation to these vital issues for women and girls, the benefits of social media and being online include providing children with the ability to:

- Access information on healthy relationships that may not be available to children at school
- Gain exposure to different ways of life and see relationships modelled which help young women and girls to recognise dynamics and patterns of behaviour which are abusive
- Access websites which advise children of their rights regarding abuse
- Access digital services such as online chats with domestic abuse and gender based violence services. This includes access to phone numbers and email addresses for these services, and information which can direct young women and girls and those of marginalised genders to their nearest available shelter or refuge
- Access to peers and friends online and through social media. Particularly where young people are of marginalised experience and are facing violence and/or exclusion from peers in school or domestic environments
- Engage with content which models healthy masculinity to young men and boys

- Access resources which offer positive alternatives to the extreme misogynistic content increasingly promoted to and influencing the beliefs and behaviours of young men and boys

The benefits of social media and online spaces which we have listed in response to this question, both broad and VAWG-specific in scope, are elevated when considering children of especially marginalised experience. These children are additionally also less likely to have equitable access to relevant service provision than their non-marginalised peers.

"Social media is not a luxury, for many children, especially those who are isolated or marginalised, it is a lifeline providing access to learning, connection, play, and self-expression." (UNICEF, 2025).

A blanket age ban would therefore disproportionately restrict access to these benefits for children who are:

- Care-experienced; Scotland in particular has specific obligations to these children as a result of commitments to The Promise, the core outcome of the Independent Care Review (Independent Care Review, 2020)
- Socioeconomically disadvantaged (Müller, Klaus-Martin, and others. 2025)
- Disabled and for whom offline services and spaces may not be accessible
- Neurodivergent and for whom offline services and spaces may not be accessible
- Part of racialised communities and minoritised ethnic groups
- LGBTQ+ communities (Trevor Project and Digital Wellness Lab, 2025) – particularly those in rural environments in Scotland (LGBT Youth Scotland 2023)

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

Social media use and being online present a variety of serious risks and harms to children. These risks and harms are gendered.

Young women and girls experience disproportionate levels of risk and associated harm due to the prevalence and severity of gendered violence, abuse, harassment, and misogyny in online spaces and social media.

Ofcom's Strategic priorities acknowledge that 'The government is particularly concerned about the amount of abuse women and girls receive online, with Ofcom's annual Online Nation report finding that women are more likely to encounter misogynistic content or content relating to negative body image and are more likely to be negatively affected by harmful content they encounter (Ofcom / DSIT, 2025).

Men and boys meanwhile are at risk from content, often intentionally promoted through algorithms, which exploits their insecurities and vulnerabilities. This content

creates an expectation to model unhealthy masculinity rooted in misogyny and gender inequality; under the misguided impression that these behaviours and beliefs will help them to attain an ideal of what it is to be 'successful' as men (Zero Tolerance, 2024). Harmful content is often promoted to and engaged with by children as a result of the intentional design of algorithms.

An age ban does not address this. A 16-year-old girl faces the same algorithmically amplified misogynistic content as a 15-year-old. This is not appropriate at any age. The problem is the content, the actions of perpetrators, and intentional design features of social media platforms which prioritise sensational or controversial content based on user data. An effective solution must therefore take a primary prevention approach and address risk at the root cause: the design of social media platforms, unacceptable content hosted on those platforms, and the misogynistic and abusive behaviours of content creators and users.

There must also be greater provision of safer offline spaces for all children, to provide viable alternatives to online spaces. This will provide more opportunities for children to engage with activities and services without needing to rely as frequently on online spaces and social media – which may otherwise be their only option for meeting their needs. These spaces must be developed with a focus on safeguarding and creating environments free from VAWG. They should be developed to be systemically and intersectionally inclusive, sensitive to the needs of especially marginalised young people who may typically be excluded from offline spaces.

Risks associated with social media use and being online, for children, include exposure to:

- Content which platforms misogynistic and sexist beliefs and behaviours, encouraging harmful beliefs, furthering gender inequality and directly harming children of all genders – particularly women and girls
- Gender-based violence, which is disproportionately perpetrated by men and boys and harms children of all genders – particularly women and girls. This can take the form of comments and direct communication which aims to threaten, intimidate, or harass. Sending or requesting sexual images, generating

sexualised 'deepfakes' through the use of AI tools, and other forms of harassment, bullying, and abuse. All of these online risks and harms translate into offline risks, harms and negative impacts

- Content promoting unrealistic and harmful aesthetic ideals which furthers gender inequality and directly harms children
- Content encouraging unhealthy relationships with eating, which disproportionately impacts women and girls
- Content promoting and encouraging self-injury
- Content promoting and encouraging suicide, which can impact children of all genders. In the instance of online 'Incel' culture, prominent themes include fostering a sense of hopelessness amongst young men and boys who do not meet unattainable constructed gender ideals. Promoting or discussing suicide in response to this sense of hopelessness is common
- Pornographic content, which is often available and promoted to users under the age of 18 regardless of whether they intend to access it. Ofcom's data shows that 32% of 13–17-year-olds encountered primary priority harmful content, including pornography and self-harm material, in a four-week period in 2024 (Ofcom /DSIT, 2025.) This is not a marginal problem
- Gambling (Gambling Commission, 2025) and other risk-taking behaviours, and influencers who promote extreme views e.g. incel culture
- Viewing or directly receiving communications which are misogynistic and sexist in nature, and sexual harassment – with platform design often playing a role in facilitating these risks (NSPCC, 2025). Sometimes from strangers and sometimes the peers also known to them in offline contexts such as school.
- Bullying. The most common form of bullying young people experienced in 2024 was through social media (16%), as likely as face-to-face bullying (Ofcom, 2025.)
- Risks of being contacted by adults and peers who intend to cause them harm such as through sexual abuse and exploitation, blackmail etc.

- Potential for addiction, particularly due to the way content and algorithms are designed (De, D. et al, 2025)

Exposure to certain types of content and communications causes harm to children in and of itself.

Another risk is that exposure can encourage children to themselves display and propagate harmful behaviours and actions. This is a particular issue with regard to the harmful behaviours and actions of men and boys, which are increasingly rooted in misogynistic beliefs promoted online and subsequently expressed through online and offline gender-based violence – the harm of which is very real in either case.

This violence disproportionately harms young women and girls, and people of marginalised genders.

The focus of this consultation relates to social media and online spaces. We must however remain cognisant that these underpinning behaviours, inequalities, and forms of gender-based violence are by no means unique to the online world. The online world does not operate in a vacuum and harmful beliefs and behaviours are similarly propagated, learned from, built into design, and reinforced by a society which is systemically patriarchal, violent, and inequitable for women and girls. Contemporary life in the UK is a combination of offline and online experiences for the vast majority of people. To be effective in addressing associated risks and harms, we must take a primary prevention approach. One which considers the interface between online and offline, acknowledges that they are part of the same world, and addresses the issues at their root cause: gender inequality.

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

- a. Yes
- b. No
- c. Don't know/Prefer not to answer

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

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

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

- a. Yes – 13
- b. Yes – 14
- c. Yes – 15
- d. No – not lower than 16
- e. Other (please specify)
- f. Don't know/ Prefer not to answer

Please explain the reasoning behind your answers about minimum age requirements.

Current evidence from other countries which have introduced minimum age restrictions for social media and online spaces does not suggest that this is an effective approach in preventing access. Furthermore, restricting access would fail to address the key risks and harms at their root cause: gender inequality and platform design. Misogyny, gender inequality, and VAWG are promoted through intentional design of platforms and features and the behaviours of some content creators and users. We therefore reiterate the call we make throughout our responses to this

consultation that an effective solution must take a primary prevention approach. An approach which does not make children bear responsibility and disadvantage for the online and offline systems which have been designed by adults for gain at the expense of their safety.

An effective solution must instead:

- Hold tech platforms accountable in robustly addressing harmful platform design and content which is not suitable regardless of age
- Tackle the root cause of VAWG and misogyny through online and offline education and engagement
- Ensure adequate provision of safer offline services and spaces for all children and young people. These services and spaces must be designed with VAWG prevention as a priority and built to be systemically and intersectionally inclusive for especially marginalised groups.

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

The risks social media can pose to young people are not inherent to the minimum age at which children and young people can access social media but rather the intentional design of the social media platforms themselves. In December 2025 UNICEF made this distinction clear; age restriction laws are not a substitute for companies improving platform design and content moderation.

"Regulation should not be a substitute for platforms investing in child safety. Laws introducing age restrictions are not an alternative to companies improving platform design and content moderation." (UNICEF, 2025).

International evidence from other countries who have implemented age restrictions clearly demonstrates that age restrictions are in practice ineffective in restricting young people's access to social media. "There is little evidence that age-based bans are an effective solution, and there is growing reason to believe they may raise as many challenges as they aim to solve." (Brookings Institution, 2025).

A minimum age requirement would therefore not only fail to address the risks associated with social media, but in the process also unduly limit young people's access to:

- Educational material
- Online social spaces which allow them to interact with more representative cross-section of their peers
- Information and services for people of marginalised experience
- Spaces which are comparatively much safer than the offline spaces available to them.

All of these areas are particularly important for young women and girls.

If age restrictions were implemented:

- Children and young people would emerge into an online world which continues to present the same risks and dangers as it does now. There is no acceptable age at which to be exposed to gender-based violence. These risks are systemic, and result from specific intentional features of social media platforms, along with behaviours influenced by misogyny and gender inequality. We must instead tackle gender inequality, and the features of social media which promote it.
- Children would not have had the opportunity to become familiar with social media environments, how to navigate them, and most importantly how to recognise and avoid some areas of risk based on expert advice.
- Children and young people would not have the opportunity to develop core technical skills needed for modern civic, educational, social and professional life in the UK.
- Children and young people would be excluded from information and advocacy around their health, rights, and relevant services.

It is clear that online spaces and social media need to be managed. The current situation is exposing children to significant risk and profound harm at scale. It would be wholly negligent to allow this to continue. Urgent change is required. Both in regard to content which is misogynistic and encourages VAWG and therefore is not appropriate at any age, and also in recognition that there will always be certain online spaces which are not suitable for children to engage with.

Current evidence suggests that age restrictions as a mechanism are not likely to be effective in reducing access. We must think systemically and address the design of the environments themselves by way of the content and features which promote content. The onus for this should be placed on platform providers through regulation targeting specific content and features such as recommendation algorithms. It should not disadvantage children, for whom social media and the online world can provide some beneficial and often essential content and outlets for self-expression. The approach must be one of systemic change, amidst a broader picture of reducing the prevalence of VAWG and misogynistic beliefs in society – both online and offline.

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

- a. Daily screen time limits for individual apps
- b. Restricting overnight access for individual apps
- c. Both – Daily screen time limits and overnight access for individual apps
- d. I would not support any of them

e. Don't know/ Prefer not to answer

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

Time limits would not address the risks and harms associated with social media and the online world.

The solution is a combination of two key factors.

Regulation of online platforms and accountability for platform providers to remove specific harmful features and content. This includes removing algorithmic recommendations of content which is not suitable at any age, such as content which promotes misogyny and VAWG. Removing AI features until these are designed and built in such a way that removes the bias and risk which is currently inherent to their design and functionality.

Education and initiatives to change harmful beliefs and behaviours by tackling violence against women and girls at its source: gender inequality.

Please refer to our previous answers to questions 9, 10, 14, and 15 for further information.

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

Technology which uses AI can and does contribute to gender inequality and violence against women and girls (VAWG).

This includes:

The generation of non-consensual sexualised images and non-consensual alteration of non-sexual images to become sexualised. This includes sexualised image generation and alteration which depicts children under the age of 18. One particularly prevalent example is deepfake content – which aims to plausibly depict a likeness of a real individual in situations which did not occur, generally a sexualised context.

These forms of image generation using AI, including chatbots, are disproportionately created at the request of users who are men and boys. The vast majority of those being depicted are women and girls. This is a “malign form of extreme misogyny and part of a continuum leading to real-world violence” (Queen Mary University of London, 2025). It is sexual violence against women and girls at significant scale.

Inherent gendered bias known to be present in AI algorithms, and the data from which they generate outputs. This results in responses and outputs which are sexist and misogynistic in nature and presented as fact. This furthers gender inequality and systemically embeds gender inequalities into AI generated responses on a range of topics (Gibson, K, 2025). Children are likely to trust this harmful information, which in many cases will have been accessed from an educational perspective. This, along with wider concerns around accuracy make AI chatbots unsuitable for educational purposes.

AI chatbots are known to have a bias towards supporting a user’s beliefs, or being trainable to do so. This risks re-enforcing misogynistic and sexist beliefs. In some cases to the point of encouraging extremist beliefs, behaviours, and actions.

AI chatbots are often characterised as having a gender, typically this is feminised and characterised as a woman or girl. These characterisations are typically presenting a role of a subservient assistant to the user, furthering sexist stereotypes and misogynistic gender expectations (Gibson, K. 2025).

AI technology as it currently exists with these forms of inherent bias and capability for readily assisting VAWG is not suitable for use by children, or users of any age. Providers of AI services with these features must be accountable through regulation and legislation to target the features themselves. In combination with this, significant urgent attention must be given to changing harmful beliefs and behaviours through education from trusted sources.

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

- 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 – a) video, b) text, c) audio, d) 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)
- m. Other (please specify)

Please refer to our response to question 34 for more information.

- n. None of the above/AI chatbot features are not risky for children
- o. Don't know/ Prefer not to answer

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

- a. Managing screen time and online habits
- b. Spotting adverts, sponsored posts or AI generated content
- 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
- j. None of the above
- k. Don't know/ Prefer not to answer

l. Other (please specify)

Children and families need most help with media literacy and education around identifying misogynistic content online and on social media. This will help people to avoid becoming radicalised and empower them to report unacceptable content. It will also support young women and girls to identify abusive behaviours and beliefs for instance in relationships and other dynamics and engage with appropriate support services.

As an example of an education programme of this kind, Scotland has invested in the Equally Safe at School programme, a whole-school approach to preventing gender-based violence in secondary schools, now under formal RCT evaluation (Hamilton, Coral, and others, 2025) This programme addresses the attitudinal foundations that make online misogyny possible. It is prevention that addresses root causes rather than managing access.

Likewise, content which engages with boys and men in particular by exploring and encouraging healthy masculinity, and tackling misogynistic views learned from both online and offline contexts, is an essential part of the solution.

Additionally RSHPE programmes in schools must include digital literacy content on gender equality, healthy relationships, and critical engagement with online content.

References

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

- a. Develop best practice principles for industry
- 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
- f. None of the above
- g. Don't know/ Prefer not to answer
- h. Other (please specify)

We must prioritise the regulation of and accountability for online platform providers which goes beyond non-binding guidance. This will create safer online environments which are currently unsafe due to specific features and content which are promote and are influenced by misogyny and gender inequality. We should also prioritise the support and creation of safer offline spaces, which offer children including those of marginalised lived experience, positive alternatives to social media and online

spaces. Please refer to our previous responses to questions 9, 10, 14,15, and 34 for further information.

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

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

The priority must be to make positive changes to the online world and social media through accountability for tech platforms and removing specific high-risk features such as algorithmic recommendations and misogynistic content. This will help build a safer environment which therefore does not place as much responsibility on parents and carers in managing the online experiences of their children. Please refer to our previous responses to questions 9, 10, 14, 15 and 34 for further information.



For Further Information

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About Us

Zero Tolerance is a Scottish charity working to end men's violence against women by tackling its root cause: gender inequality.