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**Submission to the Inquiry into the harm young New Zealanders encounter online, and the roles that Government, business, and society should play in addressing those harms.**

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**Save the Children**

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# About Save the Children

Save the Children New Zealand is a non-governmental organisation and a registered charity originally established in the United Kingdom in 1919 and in New Zealand in 1947. We are committed to saving children's lives, protecting their rights and providing children with the opportunity to live healthy, successful lives and achieve their full potential. Our vision is a world where every child realises the right to survival, protection, development and participation. In Aotearoa New Zealand we raise funds to support our work, advocate for the rights of children to be understood, respected and upheld, provide child rights education so children and adults can learn about child rights and support youth participation through our Generation Hope programme.

**Vision:** Save the Children's vision is a world in which every child attains the right to survival, protection, development and participation.

**Mission:** We work to inspire breakthroughs in the way the world treats children and to achieve immediate and lasting change in their lives.

**Our Ambition:** We commit to doing whatever it takes to ensure by 2030 ALL children, especially the most marginalized and deprived, survive, learn, and are protected.

More information is available on the [Save the Children New Zealand website](#).

# INTRODUCTION

Save the Children welcomes the opportunity to share our submission on the Inquiry into the harm young New Zealanders encounter online, and the roles that Government, business, and society should play in addressing those harms.

We request the opportunity to present an oral submission with members of our Generation Hope youth team to the Education and Workforce Committee.

In our submission we make the following ten recommendations. These recommendations are discussed in more detail in the body of our submission.

## Recommendations

We call on decision makers to implement the following recommendations:

1. Consider a child rights approach to children's and young people's experience of the online world, encompassing provision, participation and protection in alignment with the three key pillars of the Convention on the Rights of the Child.<sup>1</sup>
2. Take a lifecourse approach to preventing harm to children and young people when online that includes the consideration of children's views, experiences and advice they have to share for a safer and more positive online world.
3. Develop, resource and implement Digital Citizenship Education to empower both children and adults to effectively reduce risks and empower children's safe and positive experiences online.
4. Hold tech platforms to account and require the significant reduction of exposure to extremely harmful, objectionable, and illegal content online.
5. Prohibit the use of algorithms that deliberately serve up inappropriate and harmful content to children and youth online.
6. Prohibit the use of strategies and settings that encourage children's excessive and/or addictive use of devices or apps.
7. Develop and implement greater controls related to online advertising that limit the amount and content of advertising being served up to children and young people online.
8. Work with children and youth to share their input into policies or legislation that may be implemented to prevent or reduce harm to children and young people online.
9. Require tech platforms to ensure that reporting, privacy and safety mechanisms can easily be accessed by young people and are effective in responding to reports of harmful behaviour or content.
10. Establish and implement age-appropriate content and/or access controls. This applies to both children and adults prohibiting children from accessing adult content similar to an R18 rating, and prevent adults from accessing platforms intended for children such as child focused live online gaming sites or chats.

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<sup>1</sup> United Nations. (1989). United Nations Convention on the Rights of the Child. Available online at <https://www.ohchr.org/en/instruments-mechanisms/instruments/convention-rights-child>

## The online world is diverse, complex, and both positive and negative

Save the Children supports the Government taking concrete steps to better understand the harms young people encounter online and the roles key stakeholder groups such as Government, business and society should play in addressing those harms.

It is clear that serious harm exists in the online world. This harm may occur through content, including content that is deemed objectionable and illegal in New Zealand and may include, suicide, child sexual abuse material, violent extremist content, and graphic violence.

Harm may also occur through the ways children and young people are treated, including by strangers or by people known to them, such as bullying, harassment, grooming, encouraging self-harm, eating disorders or violent behaviours, objectifying, sexual exploitation, scamming or other forms of exploitation, or radicalisation.<sup>2</sup> Too much time online is also known to be harmful.<sup>3</sup>

This is not an exhaustive list, but points to the extreme harm and risks that exist in the online world and that care must be taken to better protect children and young people from these harms. It should be noted that these harms exist in the real world and are not limited to being online issues. How we effectively address these harms should take a broader view that cuts across both the online and 'real' world.

Conversely, the online world also provides a myriad of positive opportunities, tools, information and experiences for children and young people. Such as connecting with friends and whānau, whether quick check-ins or maintaining relationships over long-distances, connecting with like-minded friends or interest groups, learning and skill development opportunities, the ability to seek information to support their learning and interests, connection to services, entertainment, or the ability to create and share content to a wider audience in positive ways.

For children and young people in Aotearoa New Zealand, the online world is deeply enmeshed in their daily lives. According to the 2023 Census, 93% of households have access to the internet, while InternetNZ<sup>4</sup> reports 93% of New Zealanders over 18 years (under 18s not reported) use the internet at home at least once a day. Increasingly everyday activities are moving online, such as buying the things we

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<sup>2</sup> Classification Office Te Mana Whakaatu. (2025) Content that Crosses the Line: Conversations with young people about extremely harmful content online. Available at

<https://www.classificationoffice.govt.nz/resources/research/content-that-crosses-the-line/>

<sup>3</sup> Cullen, J., et al. (2024). Impacts of digital technologies on child and adolescent health: recommendations for safer screen use in educational settings. *New Zealand Medical Journal*, 127(1598), pp 9-13. <https://nzmj.org.nz/journal/vol-137-no-1598/impacts-of-digital-technologies-on-child-and-adolescent-health-recommendations-for-safer-screen-use-in-educational-settings>

<sup>4</sup> Retrieved from <https://internetnz.nz/new-zealands-internet-insights/new-zealands-internet-insights-2021/how-do-new-zealanders-use-the-internet/>



want and need, or phones – traditional landline telephone connections are rapidly decreasing, and the national copper network is being actively phased out.<sup>5</sup> Watching TV is reliant on a digital connection and many New Zealanders access television by streaming it through a device. Health services, including mental health services, are another example of increasing reliance on the digital world where access to information and support is actively promoted including to young people. Such as messaging support apps or text response services. The Lowdown<sup>6</sup> and Aunty Dee<sup>7</sup> are just two examples.

Education is deeply enmeshed in the digital world. According to New Zealand based research, New Zealand leads in classroom device and internet usage globally.<sup>8</sup> Via the Save the Children New Zealand survey, children report school as the second most common place, after their home, that they access the internet.<sup>9</sup>

According to international research by Save the Children, children's engagement in the digital world has become so prevalent it is estimated that every half second a child goes onto the internet for the first time.<sup>10</sup>

## Action to prevent and limit harm is needed

According to reports by the Chief Censor Classification Office<sup>11</sup>, exposure to harmful content is increasing and parents, teachers, youth workers –and young people themselves – have consistently raised concerns about the impact of harmful content.

These concerns are consistent with a range of recent reports that delve into children's experiences of the online world, including the recent report published by Save the Children NZ<sup>12</sup>, Children and Youth Online Safety in Aotearoa New Zealand. This report is based on the responses of 900+ children and young

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<sup>5</sup> Retrieved from <https://www.rnz.co.nz/news/business/515424/time-running-out-for-nz-s-copper-phone-network>

<sup>6</sup> Available at <https://www.thelowdown.co.nz/>

<sup>7</sup> Available at <https://www.auntydee.co.nz/>

<sup>8</sup> Cullen, J., et al. (2024). Impacts of digital technologies on child and adolescent health: recommendations for safer screen use in educational settings. *New Zealand Medical Journal*, 127(1598), pp 9-13. <https://nzmj.org.nz/journal/vol-137-no-1598/impacts-of-digital-technologies-on-child-and-adolescent-health-recommendations-for-safer-screenuse-in-educational-settings>

<sup>9</sup> Save the Children New Zealand. (2025). Available online <https://www.savethechildren.org.nz/assets/Files/Reports/STC-NetSafe-Online-Safety-Report-2025.pdf>

<sup>10</sup> Save the Children International. (2022). Why Children Need Protection in a Digital World. Available online <https://www.savethechildren.org/us/charity-stories/why-children-need-protection-in-a-digital-world>

<sup>11</sup> Classification Office Te Mana Whakaatu. (2025) Content that Crosses the Line: Conversations with young people about extremely harmful content online. Available at <https://www.classificationoffice.govt.nz/resources/research/content-that-crosses-the-line/>

<sup>12</sup> Save the Children New Zealand. (2025). Available online <https://www.savethechildren.org.nz/assets/Files/Reports/STC-NetSafe-Online-Safety-Report-2025.pdf>

people aged 6 – 18 years old who voluntarily participated in an anonymous survey that provided children and youth the opportunity to share their views, experiences and advice related to online safety. The survey also explored the ways that children across various age groups engage in the digital world. The full report is included in Appendix Two of this submission.

While Save the Children New Zealand is strongly supportive of action to prevent and limit harm to children and youth via the digital world, we do not support the proposed ban on social media for children under 16 years of age. This measure would only protect children aged 14-15 years and is narrowly focused to social media rather than the broader digital world. The proposed ban does not address harmful content or harmful behaviours and fails to protect children 16 years and older who are at significant risk of, and some report the experience of, serious harm.

Based on our findings and in consideration of additional research while also taking into account children's rights under the UN Convention on the Rights of the Child (the Convention)<sup>13</sup>, Save the Children New Zealand makes the following recommendations to prevent and limit children and young people experiencing online harm.

## **Understanding, respecting and upholding children's rights online through a child rights approach**

**Recommendation 1: We encourage decision makers to consider a child rights approach to children's and young people's experience of the online world, encompassing provision, participation and protection in alignment with the three key pillars of the Convention on the Rights of the Child.<sup>14</sup>**

New Zealand ratified the UN Convention on the Rights of the Child in 1993 according all children in Aotearoa civil, political, economic, social and cultural rights, and sets out in detail what every child needs to have a safe, happy and fulfilled childhood. The Convention applies to all children under 18 years of age.

Children all over the world, including in Aotearoa New Zealand, are deeply immersed in the digital world. Increasingly, being online is part of children's daily lives.<sup>15</sup> Research reveals that every half second a child

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<sup>13</sup> United Nations. (1993). United Nations Convention on the Rights of the Child. Available at <https://www.ohchr.org/en/instruments-mechanisms/instruments/convention-rights-child>

<sup>14</sup> Te One, S. (2011). Defining Rights: Children's rights in theory and in practice. *He Kupu*, Vol 2, Num 4 - March 2011. Available online <https://www.hekupu.ac.nz/article/defining-rights-childrens-rights-theory-and-practice>

<sup>15</sup> Committee on the Rights of the Child. (2021). General comment No. 25 (2021) on children's rights in relation to the digital environment. United Nations, available online at [https://tbinternet.ohchr.org/\\_layouts/15/treatybodyexternal/Download.aspx?symbolno=CRC/C/GC/25&Lang=en](https://tbinternet.ohchr.org/_layouts/15/treatybodyexternal/Download.aspx?symbolno=CRC/C/GC/25&Lang=en)



goes on the internet for the first time.<sup>16</sup> Additionally, children engage in the online environment in diverse ways, and this engagement is influenced by their age and stage of development.

Taking a child rights approach to improving children's and young people's experience of the online world requires decision makers to consider children as digital citizens and legitimate consumers of and contributors to the online world. By acknowledging children in this way, adults must consider provision, participation and protection of children using digital devices and engaging in the digital world.

Provision relates to how children can access and engage in the digital world in positive, safe and equitable ways.

Participation of children encourages children to share their views, insights and expertise with adults to create a safer more positive experience, but also to be empowered to keep themselves and others safe while online.

Protection from harm is a shared responsibility shared by tech providers (or platforms), decision makers such as government, adults that support children - at home, at school, and in the community, and children themselves as informed citizens, consumers and creators.

For these three pillars to be successful, there needs to be responsibility and accountability where adults, providers and decision makers fulfil their duty to uphold children's rights in the online world.<sup>17</sup> And, that there is accountability for those that intentionally seek to harm children whether directly through some form of abuse or exploitation, or more indirectly such as platforms that allow and even promote harmful content, behaviour and practices. Governments have a critical role in implementing legislation and policies that will ensure this accountability to children is realised.

For additional information, General comment No. 25 (2021)<sup>18</sup> on children's rights in relation to the digital environment, explains how States parties should implement the Convention in relation to the digital environment and provides guidance on relevant legislative, policy and other measures to ensure full compliance with their obligations under the Convention and the Optional Protocols thereto in the light of the opportunities, risks and challenges in promoting, respecting, protecting and fulfilling all children's rights in the digital environment.<sup>19</sup>

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<sup>16</sup> Save the Children. (2022). Why Children Need Protection in a Digital World. Available online at <https://www.savethechildren.org/us/charity-stories/why-children-need-protection-in-a-digital-world>

<sup>17</sup> Committee on the Rights of the Child. (2021). General comment No. 25 (2021) on children's rights in relation to the digital environment. Available online at <https://www.ohchr.org/en/documents/general-comments-and-recommendations/general-comment-no-25-2021-childrens-rights-relation>

<sup>18</sup> Ibid.

<sup>19</sup> Ibid.

## A Lifecourse Approach

**Recommendation 2: Take a lifecourse approach to preventing harm to children and young people when online that includes the consideration of children’s views, experiences and advice they have to share for a safer and more positive online world.**

All around us, children of all ages are engaging in the online world. A lifecourse approach is needed to protect and support children of all ages; as children develop the way they engage in the online world also develops.

Examples include, pre-school children watching content via YouTube or early learning activities via Google or apps, primary school aged children streaming television content or music, playing games, or using technology as part of their learning, older children 14 years+ engaging in television and music streaming, gaming, technology-based learning and participating in social media platforms, and millions of children developing and uploading their own content.

Children’s early ability to engage online and be safe while doing so is completely reliant on adults; and this also changes as children develop. However, while adult support, primarily via parents may change, it doesn’t become any less important.

Currently, tech platforms provide a myriad of opportunities for children to access and engage in the digital world and content creators continue to develop and disseminate content designed for children at various ages to engage with online.

By considering and understanding how children engage in the digital world across their lifecourse, effective decisions can be made by decision makers including governments to foster a safer environment that doesn’t necessarily exclude children.<sup>20</sup>

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<sup>20</sup> Committee on the Rights of the Child. (2021). General comment No. 25 (2021) on children’s rights in relation to the digital environment. Available online at <https://www.ohchr.org/en/documents/general-comments-and-recommendations/general-comment-no-25-2021-childrens-rights-relation>

## Digital Citizenship Education

**Recommendation 3: Develop, resource and implement Digital Citizenship Education to empower both children and adults to effectively reduce risks and empower children's safe and positive experience online.**

International evidence shows that structured digital citizenship education can reduce risks and empower children.

Children across the world are calling for digital education as a means to support their agency in keeping themselves and others safe online through being aware of dangers, informed of actions they can take to avoid harm, and knowing what they should do if they experience harm.

Digital citizenship education is more than 'how' to use a device or app. It is about critical thinking, decision making, awareness of one's own behaviours and the awareness of others, safety, inclusion, collaboration and creativity.

Currently, New Zealand does not have a comprehensive or nationally implemented Digital Education Citizenship education curriculum or programme. Various resources, activities and information related to digital education can be found, however this is reliant on the interest of individuals rather than an intentional nationwide strategic approach to reach all children.

A successful example of Digital Citizenship Education can be found via the DQ Institute based in Singapore. The Global DQ Every Child Initiative (DQ Institute)<sup>21</sup> implemented a program that engaged 8–12-year-olds in 107 countries through a gamified platform teaching digital literacy, online safety, and responsible behaviour.

Key outcomes of the programme include:

- 15% reduction in cyber-risk exposure,
- One of the largest global datasets based on children's direct feedback on digital experiences,
- Demonstrates that children can be meaningfully involved in identifying risks and developing safer behaviours online, and
- Improves critical thinking, empathy and global citizenship skills.

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<sup>21</sup> #DQEveryChild. Global Digital Citizenship Movement for 8-12 year olds. Available at <https://www.dqinstitute.org/dqeverychild/>

## Increase the Accountability of Technology Platforms and Providers

### **Recommendation 4: Hold tech platforms to account and require the significant reduction of exposure to extremely harmful, objectionable, and illegal content online.**

If we are to achieve meaningful change and reduce the harm that children and young people are experiencing online, there must be greater accountability of the technology platforms and providers (tech platforms or similar).

Currently, our laws do not appear to be geared appropriately to ensure that tech providers and platforms can be effectively held to account for the pervasive harms that exist online. It is unacceptable that extensive harmful, violent, objectionable material that is already deemed illegal not only exists online, but appears to be easily accessible online, including by children and youth. Additionally, too many children experience this content unintentionally, some via it being served up on their app feeds, others have it shared to them without seeking it, and others find it as part of their online explorations.<sup>22</sup>

Many children and youth report they don't want to see extremely harmful content,<sup>23 24</sup> and want to see tech companies take responsibility for proactively removing or blocking such content.<sup>25</sup>

Children and young people that engaged in an online safety survey (Save the Children, Netsafe, 2025)<sup>26</sup> felt that tech companies have responsibilities related to internet content and user habits. Similar sentiments were expressed by young people that engaged in consultations led by the Classification Office where young people also expressed frustration with social media platforms – from inadequate content moderation to reporting tools seen by some as overly complicated or largely ineffective.<sup>27</sup>

Recommendations included removing live chat features from online games that are played in real-time with strangers, particularly for younger children, making it easier for children to report harm, the removal

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<sup>22</sup> Classification Office Te Mana Whakaatu. (2025) Content that Crosses the Line: Conversations with young people about extremely harmful content online. Available at <https://www.classificationoffice.govt.nz/resources/research/content-that-crosses-the-line/>

<sup>23</sup> Ibid.

<sup>24</sup> Save the Children. (2020). Protect A Generation. Available online <https://resourcecentre.savethechildren.net/document/hidden-impact-covid-19-children>

<sup>25</sup> Save the Children New Zealand. (2025) Report: Children and Youth Online Safety in Aotearoa New Zealand. Available online, <https://www.savethechildren.org.nz/assets/Files/Reports/STC-NetSafe-Online-Safety-Report-2025.pdf>

<sup>26</sup> Save the Children New Zealand. (2025) Report: Children and Youth Online Safety in Aotearoa New Zealand. Available online, <https://www.savethechildren.org.nz/assets/Files/Reports/STC-NetSafe-Online-Safety-Report-2025.pdf>

<sup>27</sup> Classification Office Te Mana Whakaatu. (2025) Content that Crosses the Line: Conversations with young people about extremely harmful content online. Available at <https://www.classificationoffice.govt.nz/resources/research/content-that-crosses-the-line/>

of reels, age limits on content, removing harmful content, and greater restrictions on unsolicited content and or comments.

Ofcom<sup>28</sup>, the regulator for communications services in the United Kingdom, has published guidance that calls on tech platforms, providers or similar to ensure the greater safety of children and youth online by deliberately designing safer experiences for children, ‘Firms must first assess the risk their service poses to children and then implement safety measures to mitigate those risks.’<sup>29</sup>

## Algorithms that serve up inappropriate and harmful content to children and youth should be prohibited

### Recommendation 5: Prohibit the use of algorithms that deliberately serve up inappropriate and harmful content to children and youth online.

There is increasing awareness of the problematic nature of algorithms that are invisible but powerful systems that determine what digital users, including children and youth, see online. Algorithms are being used to curate the content shown in social media feeds and features include suggesting a video or reel to watch next.<sup>30</sup>

This is the method that most online users receive unsolicited content. The content we see is no longer solely reliant on what we are deliberately searching for.

While algorithms can be helpful in suggesting content similar to our interests, it is not foolproof, and there is growing concern that algorithms are being used to deliberately target young people with harmful content.

According to the eSafety Commissioner (Australia), ‘While algorithms are not always harmful, their purpose is to maximise engagement – often at the expense of the user’s wellbeing. This means they may amplify sensationalist, extreme or divisive content and push adolescents toward potentially harmful content such as unrealistic beauty standards, violent material, or hate speech.’<sup>31</sup>

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<sup>28</sup> <https://www.ofcom.org.uk/about-ofcom/what-we-do/what-is-ofcom>

<sup>29</sup> <https://www.ofcom.org.uk/online-safety/protecting-children/tech-firms-must-tame-toxic-algorithms-to-protect-children-online>

<sup>30</sup> Ibid.

<sup>31</sup> eSafety Commissioner, Australia. Available online, <https://www.esafety.gov.au/newsroom/blogs/an-unfair-fight-how-algorithms-are-shaping-our-adolescents>

Children and young people have also expressed concern about the role of algorithms ‘keeping them online’ and the content they are seeing.<sup>32</sup> Some young people that participated in a consultation led by the Classification Office (New Zealand) described how social media algorithms and shared content can contribute to seeking harmful material. Recognising that, social media is designed to keep users engaged with attention-grabbing material, and shocking content can keep showing up in their feed.

A desire to limit unsolicited or ‘recommended’ content was strongly communicated by children and youth participating in an online safety survey (Save the Children, Netsafe, 2025).<sup>33</sup> ‘More control over ads and the content I see’ was the leading recommendation selected by 752 participants to make the internet better for young people in the online safety survey (Save the Children, Netsafe, 2025).<sup>34</sup>

Understanding how algorithms influence adolescents is critical for fostering healthier digital interactions. Cumulative exposure can lead to:

- **dependency** – infinite scrolling and autoplay encourage compulsive behaviour that can make it harder for adolescents to disconnect
- **misleading content** – algorithms may promote misleading or harmful content, affecting young people’s understanding of important topics and shaping their world view
- **distorted reality** – content rabbit holes can draw young people deeper and deeper into content which may encourage or reinforce harmful attitudes, thoughts and behaviours. These echo chambers can warp expectations about life, relationships, and success.<sup>35</sup>

Algorithms that serve up inappropriate and/or harmful content should be prohibited, particularly in relation to children and youth if we are to be successful in creating a safer and more positive online world for young people to engage in. Digital platforms that employ these tools must be accountable for any harm that is caused whether it is intentional, or not.

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<sup>32</sup> Classification Office Te Mana Whakaatu. (2025) Content that Crosses the Line: Conversations with young people about extremely harmful content online. Available at

<https://www.classificationoffice.govt.nz/resources/research/content-that-crosses-the-line/>

<sup>33</sup> Save the Children New Zealand. (2025) Report: Children and Youth Online Safety in Aotearoa New Zealand. Available online, <https://www.savethechildren.org.nz/assets/Files/Reports/STC-NetSafe-Online-Safety-Report-2025.pdf>

<sup>34</sup> Ibid.

<sup>35</sup> eSafety Commissioner, Australia. Available online, <https://www.esafety.gov.au/newsroom/blogs/an-Xunfair-fight-how-algorithms-are-shaping-our-adolescents>



## Strategies and settings that encourage excessive use and/or addictive online engagement should be prohibited

### **Recommendation 6: Prohibit the use of strategies and settings that encourage children's excessive and/or addictive use of devices or apps.**

Similar to the problematic nature of algorithms, there is growing awareness of the deliberate use of strategies, app or device settings, and content type to encourage excessive time online. This deliberate targeting also applies to children.

Children participating in an online safety survey (Save the Children, Netsafe, 2025) <sup>36</sup> expressed awareness that apps encourage addictive behaviour, like 'endless scrolling' and some older youth express concern about the length of time they spent online.

Tech platforms, app and content developers should be required to prioritise safety over lengthy engagement. This is especially important for children, including very young children. Research (Cullen, et al., 2024), findings show that excessive screen time is harmful to children and youth, with young children being particularly effected.<sup>37</sup>

Not all parents are aware of the harms caused by screen time, it is also unclear how well parents are informed in relation to device settings that can be put in place to increase safety, privacy and limit time on screen. The Committee on the Rights of the Child recommends that training and advice on the appropriate use of digital devices should be given to parents, caregivers, educators and other relevant actors, taking into account the research on the effects of digital technologies on children's development, especially during the critical neurological growth spurts of early childhood and adolescence.<sup>38</sup>

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<sup>36</sup> Save the Children New Zealand. (2025) Report: Children and Youth Online Safety in Aotearoa New Zealand. Available online, <https://www.savethechildren.org.nz/assets/Files/Reports/STC-NetSafe-Online-Safety-Report-2025.pdf>

<sup>37</sup> Cullen, J., et al. (2024). Impacts of digital technologies on child and adolescent health: recommendations for safer screen use in educational settings. *New Zealand Medical Journal*, 127(1598), pp 9-13. <https://nzmj.org.nz/journal/vol-137-no-1598/impacts-of-digital-technologies-on-child-and-adolescent-health-recommendations-for-safer-screen-use-in-educational-settings>

<sup>38</sup> Committee on the Rights of the Child. (2021). General comment No. 25 (2021) on children's rights in relation to the digital environment. United Nations, available online at [https://tbinternet.ohchr.org/\\_layouts/15/treatybodyexternal/Download.aspx?symbolno=CRC/C/GC/25&Lang=en](https://tbinternet.ohchr.org/_layouts/15/treatybodyexternal/Download.aspx?symbolno=CRC/C/GC/25&Lang=en)

## Online Advertising Regulation to protect children is needed

**Recommendation 7: Develop and implement greater controls related to online advertising that limit the amount and content of advertising being served up to children and young people online.**

Online Advertising Regulation to protect children should also be considered and included in policies that limit online harm to children and young people.

Advertising to children has become a multibillion-dollar industry.<sup>39</sup> Children and teenagers are being targeted with advertising for harmful and addictive products such as gambling, alcohol, and unhealthy food online.<sup>40</sup>

[#DigitalYouth](#) report<sup>41</sup> shows children as young as 8 years old are exposed to approximately 13 junk food ads per day, while teenagers may see an average of one instance of gambling marketing, 6 alcohol ads, and 24 junk food ads daily. Furthermore, many of the ads targeted at children and young people are interactive, prompting them to engage further with the products.<sup>42</sup>

In an online safety survey (Save the Children, Netsafe, 2025),<sup>43</sup> control over ads and content was the most recommended action that would make the internet better for young people. Child and youth participants want to see fewer adverts, and they were aware that many adverts were not appropriate for children. Children and young people reported advertisements of all types popping up in the free apps they are using such as games or while on YouTube or Google. They also felt that advertisements should be restricted when they are online at school.

Advertisements are essentially a way of streaming unsolicited content into a user's feed regardless of who the user is. The streaming of unsolicited advertising content has implications in terms of being age appropriate, particularly as young children may be more likely to access the internet via a family account and potentially a parents' device.

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<sup>39</sup> UNICEF, Children and Digital Marketing. Available online at

<https://www.unicef.org/childrightsandbusiness/workstreams/responsible-technology/digital-marketing>

<sup>40</sup> London School of Economics. (2024). Children's online marketing harms: roundtable reflections. Available online at <https://www.digital-futures-for-children.net/events/marketing-harms>

<sup>41</sup> Deakin University. (2024). #Digital Youth – How children and young people are targeted with harmful product marketing online. Available online at <https://iht.deakin.edu.au/2024/06/new-research-shows-kids-are-targeted-with-alcohol-gambling-and-junk-food-ads-online/>

<sup>42</sup> Ibid.

<sup>43</sup> Save the Children New Zealand. (2025) Report: Children and Youth Online Safety in Aotearoa New Zealand. Available online, <https://www.savethechildren.org.nz/assets/Files/Reports/STC-NetSafe-Online-Safety-Report-2025.pdf>

## **Support children and youth to share their views and experiences to inform regulated online safety measures.**

**Recommendation 8: Work with children and youth to share their input into policies or legislation that may be implemented to prevent or reduce harm to children and young people online.**

For online safety measures that may include new policies or legislation to be effective, the contributions of children and young people must be supported.<sup>44</sup> Under the Convention on the Rights of the Child<sup>45</sup>, children have the right to express their views and have them taken into account on decisions being made that impact them. Children of all ages are deeply impacted by the online world; therefore, any new regulations will directly affect them.

Children of all ages are capable of providing valuable insights that can inform adults' understanding of the challenges they face online, strategies to mitigate them, and actions and knowledge that supports them to feel safe and actively avoid harm.<sup>46</sup>

The opportunity to share their views and inform decisions on how to improve safety online has been a consistent call from children across a number of research projects (see Appendix One). However, too often, children are excluded from policy decisions that directly impact them. Ensuring children have a say on an issue that deeply affects them, learning from their experiences in order to develop informed understanding and then recommendations for positive change, is why we partnered with Netsafe to develop an online survey to give children aged 6 to 18 years the opportunity to have their say on the safety of children and youth online. The full report<sup>47</sup> on the survey is available online and in Appendix Two of this submission.

Save the Children strongly recommends that in addition to the Select Committee process of this government led inquiry, that children and young people are consulted with and their views inform new regulations to improve the online safety of children and young people in Aotearoa New Zealand.

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<sup>44</sup> Committee on the Rights of the Child. (2021). General comment No. 25 (2021) on children's rights in relation to the digital environment. United Nations, available online at [https://tbinternet.ohchr.org/\\_layouts/15/treatybodyexternal/Download.aspx?symbolNo=CRC/C/GC/25&Lang=en](https://tbinternet.ohchr.org/_layouts/15/treatybodyexternal/Download.aspx?symbolNo=CRC/C/GC/25&Lang=en)

<sup>45</sup> Ibid.

<sup>46</sup> Save the Children New Zealand. (2025) Report: Children and Youth Online Safety in Aotearoa New Zealand. Available online, <https://www.savethechildren.org.nz/assets/Files/Reports/STC-NetSafe-Online-Safety-Report-2025.pdf>

<sup>47</sup> Ibid.

## Reporting, privacy and safety mechanisms must be easily accessed by young people for their protection online

**Recommendation 9: Require tech platforms to ensure that reporting, privacy and safety mechanisms can easily accessed by young people and are effective in responding to reports of harmful behaviour or content.**

It is the responsibility of tech platforms, app creators, and similar, to ensure that children and young people, and their parents are well informed and can easily access reporting, privacy and safety mechanisms.

While these mechanisms exist, not all young people know how to use them, find them accessible to use or trust their effectiveness.<sup>48 49</sup>

Children that reported feeling safe online via the survey led by Save the Children New Zealand and Netsafe (2025)<sup>50</sup> often cited using privacy tools and controls as a means of protection online as a reason for feeling safe. However, other children appeared less aware of settings and worried about their data or identity being misused. Some children recommended that privacy settings should be automatically applied and set at the highest security levels whenever a new account was made.<sup>51</sup>

Save the children calls for tech platforms, or similar, to be required to lead with a privacy and safety first approach, where the highest levels of account protections are automatically applied and users can relax these controls if they choose to. Legislation changes should enforce these protections.

Reporting mechanisms should be easily accessible this includes, that users can easily find and activate the reporting mechanism, anonymity, and should communicate whether the report of harm has been actioned. A number of young people in the online safety survey (Save the Children, Netsafe, 2025)<sup>52</sup> stated they felt

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<sup>48</sup> Save the Children New Zealand. (2025) Report: Children and Youth Online Safety in Aotearoa New Zealand. Available online, <https://www.savethechildren.org.nz/assets/Files/Reports/STC-NetSafe-Online-Safety-Report-2025.pdf>

<sup>49</sup> Classification Office Te Mana Whakaatu. (2025) Content that Crosses the Line: Conversations with young people about extremely harmful content online. Available at <https://www.classificationoffice.govt.nz/resources/research/content-that-crosses-the-line/>

<sup>50</sup> Save the Children New Zealand. (2025) Report: Children and Youth Online Safety in Aotearoa New Zealand. Available online, <https://www.savethechildren.org.nz/assets/Files/Reports/STC-NetSafe-Online-Safety-Report-2025.pdf>

<sup>51</sup> Ibid.

<sup>52</sup> Ibid.

reporting harm was ineffective or they did not trust that the platform had acted. Similar sentiments were expressed in the Classification Office Report.<sup>53</sup>

## **Establish and implement age-appropriate content and/or access controls to support greater protection for children and young people online**

**Recommendation 10: Establish and implement age-appropriate content and/or access controls. This applies to both children and adults prohibiting children from accessing adult content similar to an R18 rating, and prevent adults from accessing platforms intended for children such as child focused live online gaming sites or chats.**

Many people, children and adults alike are concerned with content children and young people are exposed to online. When content is being shared, recommended or served up online, it opens as soon as a user clicks on it. This means that harmful content can be a single click away. Unless the opening content is overtly graphic, there is no clear way of knowing the age appropriate viewing level of the content.

Save the Children recommends that mature and adults only content should be clearly rated, so people are informed of the viewing level of content they are selecting before they click on it.

Additionally, we call on tech platforms or similar, to intentionally filter content and prevent mature and adults only content from being served up, recommended or shared to accounts of children and young people under 18 years of age. Age controlled access should also be considered for platforms that are specific to children, such as limiting adults from joining live online games played by children, and related chat functions.

While parental controls exist, not all parents know how to apply them, nor are they routinely easily applied. We are calling on the responsibility to lie with the tech platform, or similar, first.

Any changes to online safety legislation, should consider how best to include a system that clearly flags the age-related rating of mature and adult only content.

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<sup>53</sup> Classification Office Te Mana Whakaatu. (2025) Content that Crosses the Line: Conversations with young people about extremely harmful content online. Available at <https://www.classificationoffice.govt.nz/resources/research/content-that-crosses-the-line/>

## Conclusion

Save the Children welcomes the Government's inquiry to greater understand the harm young New Zealanders are experiencing online and explore the roles key stakeholders play in protecting them, and to explore and consider potential solutions.

We have submitted a range of solutions based on the voices of children and young people and in consideration of relevant global and New Zealand based research. We advocate for solutions that consider the diverse ways children and youth engage in the online world.

This submission has been written by Jacqui Southey, Child Rights Advocacy and Research Director on behalf of Save the Children New Zealand. For any inquiries related to this research please contact Jacqui Southey, via email [jacqui.southey@scnz.org.nz](mailto:jacqui.southey@scnz.org.nz)



# APPENDIX ONE: SUMMARY OF RESEARCH

Author: Marina Borodatova, Save the Children New Zealand

Date: 30 July 2025

## Child Rights in the Digital World

### General comment No. 25 (2021) on children's rights in relation to the digital environment

<https://www.ohchr.org/en/documents/general-comments-and-recommendations/general-comment-no-25-2021-childrens-rights-relation>

This general comment draws on the Committee's experience in reviewing States parties' reports, its day of general discussion on digital media and children's rights, the jurisprudence of the human rights treaty bodies, the recommendations of the Human Rights Council and the special procedures of the Council, two rounds of consultations with States, experts and other stakeholders on the concept note and advanced draft and an international consultation with 709 children living in a wide variety of circumstances in 28 countries in several regions.

### The Objective of the General Comment:

In the present general comment, the Committee explains how States parties should implement the Convention in relation to the digital environment and provides guidance on relevant legislative, policy and other measures to ensure full compliance with their obligations under the Convention and the Optional Protocols thereto in the light of the opportunities, risks and challenges in promoting, respecting, protecting and fulfilling all children's rights in the digital environment.

## Digital Citizenship Education

### Global DQ Every Child Initiative (DQ Institute/Singapore)

<https://www.dqinstitute.org/dqeverychild/>

A globally implemented digital citizenship program that uses a gamified platform across 107 countries, demonstrating measurable reduction in cyber-risk exposure among 8–12-year-olds

Key data points:

- This initiative involved direct engagement with 8–12-year-old children across 107 countries.
- It used a gamified digital citizenship platform (DQWorld.net) designed to both teach and assess children's digital skills, risks, and behaviours.
- Results include measurable data showing a **15% reduction in cyber-risk** exposure.
- The project gathered quantitative and qualitative data directly from children's participation, offering one of the largest datasets based on children's digital experiences and feedback globally.

## Youth19 – Youth Voice Brief

<https://static1.squarespace.com/static/5bdbb75cccf37259122e59aa/t/5f3394a2654885030c051243/1597215912482/Youth19%2BYouth%2BVoice%2BBrief.pdf>

**Conducted by:** Victoria University of Wellington, University of Otago, University of Auckland

**Participants:** 7,700+ NZ adolescents (Years 9–13)

**Regions:** Auckland, Northland, Waikato

**Data based on open-text responses from 2,763 students (36%)**

Key data points:

### Q1: *What are the biggest problems for young people today?*

- **Mental health & pressure** (most common theme):  
Students described stress, depression, and lack of support due to societal, school, and family expectations.

“Expectations. The expectation to be the best at all times... all of this pressure effects kids greatly.” – Female, 15

- **Social media & tech harm:**  
Students cited addiction, sleep disruption, emotional distress, comparison, and screen overuse.

“We are caught in our screens too much... addicted to our devices.” – Male, 16

- **Risky choices:**  
Concerns about peer pressure, substance use, pornography, and lack of education around sex and consent.
- **Bleak futures / climate anxiety / racism:**  
Feelings of being left with problems caused by adults, particularly climate change and economic inequality.

### Q2: *What needs to change to better support young people?*

- **Listen. To. Us.**  
Students pleaded for adults to take their voices seriously at home, school, and in policy.

“A way for our voice to be heard and accepted.” – Female, 14

“Having young people involved in important decisions.” – Female, 15

- **Support systems:**  
Want more low-key emotional and social support, mentoring, and early mental health intervention.
- **Update schools:**  
Call for practical life-skills learning (e.g. taxes, job seeking, managing stress) and less pressure from grades.

- **Connection & fun:**  
Suggestions included events, friend-making groups, better transport, and youth-driven social spaces.
- **Save our future:**  
Demand for climate action, affordable housing, and an inclusive, discrimination-free society.

Demographic	Responded to Q1 (%)	Responded to Q2 (%)
All students	36%	21%
Māori students	31%	19%
Pacific students	40%	23%
High decile schools	42%	24%
Asian students	37%	20%

### 2023–2024 Global Privacy Assembly (GPA) Digital Education Working Group (DEWG)

[https://globalprivacyassembly.org/wp-content/uploads/2025/03/5.-DEWG-Annual-activity-Report-2023-2024-09-October-2024.CNIL\\_.pdf](https://globalprivacyassembly.org/wp-content/uploads/2025/03/5.-DEWG-Annual-activity-Report-2023-2024-09-October-2024.CNIL_.pdf)

#### Global Consultation with 83+ Authorities

- 83 GPA members (Data Protection Authorities worldwide) responded to a detailed consultation in 2023.
- Focus: understanding parents' concerns and existing digital education strategies.

#### Parents' Concerns Identified

- Key concerns raised by parents included:
  - Exposure to inappropriate content.
  - Excessive screen time and addiction risks.
  - Lack of age-appropriate protections.
  - Unclear guidance on how to educate or support children online.

#### Educational Campaign Gaps and Recommendations

- Parents find current resources often too technical, restrictive, or fragmented.
- DEWG stressed the need for:
  - Clear, simple, age-appropriate messages for parents.
  - Resources that promote empowerment over restriction.
  - Messaging tailored to different age groups, development stages, and parental needs.

#### Initiatives & Tools Developed

- The DEWG worked to map and catalogue:
  - Best practices from national-level parental education initiatives.
  - Campaigns that include co-designed messages with parents, educators, and children.

#### Planned Releases (2024–25):

- Parent Concern Survey Results
- Unified international guidance for parents and educators to be published (non-restrictive approach).
- Resources tailored by child development stages—from young children to teens.

#### Global Scope & Reach

- As of 2024, the DEWG included 88 member authorities, enabling broad international coordination.
- Actively working with civil society, technology platforms, and child protection experts to:
  - Embed privacy-by-design and child-first thinking in tech tools.
  - Promote age-assurance systems to align with children's developmental needs.

### Save the Children's Online Safety Research

#### STC–NetSafe Online Safety Report 2025

<https://www.savethechildren.org.nz/assets/Files/Reports/STC-NetSafe-Online-Safety-Report-2025.pdf>

This research was based on consultations with over 900 children and youth across Aotearoa New Zealand, aged 7 to 18. It aimed to understand how young people experience the online world, what helps them feel safe, and what they want to see change.

Key data points:

What helps children feel safe online?

- Supportive adults: Children and youth across all age groups consistently said that having trusted adults (especially parents and teachers) helps them feel safe online.
- Education: Access to digital safety education helped children recognize harmful content and respond appropriately.

What harms do children face?

- Unwanted content: Children frequently reported seeing violent, sexual, or scary content—often unintentionally.
- Online bullying: A recurring issue, with older youth more likely to report being targeted.
- Addictive use: Many participants mentioned spending longer online than they wanted to, especially on social media or games.

What changes do children want?

- More content control: Children want age-appropriate restrictions, better filtering, and the ability to block unwanted ads and content.
- Greater platform accountability: Children said tech companies should be doing more to prevent harmful or inappropriate content from reaching them.
- Safer social platforms: Some suggested limiting access by age, removing toxic comment sections, and requiring better identity verification to stop fake profiles.

## Why Children Need Protection in a Digital World (Jordan Research, ~2022)

<https://www.savethechildren.org/us/charity-stories/why-children-need-protection-in-a-digital-world>

Site-specific research from Zaatari refugee camp, recognizing children's digital harm protection as one of their top five child protection priorities - affirming global relevance.

Key data points:

Children globally are entering the digital world every 0.5 seconds.

Children in conflict-affected areas are actively using digital tools and concerned about online risks.

Two-thirds of school-aged children globally lack internet access at home.

## Safe Digital Childhood Coalition (2023–present, Global)

<https://content.savethechildren.org/safe-digital-childhood/index.html>

Save the Children's \$50M global initiative focused on participation, protection, and well-being. It supports digital inclusion, digital citizenship training for children and caregivers, and amplifies youth voices

Key data points:

- 50% increase in depression risk linked to excessive screen time in adolescents.
- Girls and women are 23% less likely to use mobile internet globally, up to 43% in South Asia.
- Over 2 million people reached through digital safety campaigns in:
  - Bosnia and Herzegovina, Kosovo, Serbia (Connected & Safe project)
  - Zambia (Keeping Boys and Girls Safe Online project)
- In Bolivia:
  - 2,348 children, 2,097 caregivers, and 1,324 public servants engaged in digital safety and literacy training.
- In Sri Lanka: An Online Safety App was developed for anonymous reporting and support.

The "Protect a Generation" report by Save the Children

<https://image.savethechildren.org/protect-a-generation-report.pdf-ch11042685.pdf/3ky588jo618571iawa16agj3855p7g04.pdf>

A global study that captures the voices of children and youth about the impact of the COVID-19 pandemic, including their experiences with online harm and digital access.

- The report surveyed over 25,000 children and caregivers across 37 countries.
- It specifically included firsthand responses from children aged 11 to 17, making it one of the largest global consultations with children during the pandemic.

Key data points:

### 1. Online Safety Concerns:

- A significant number of children reported feeling unsafe online, with girls being more likely than boys to experience online harm.

- Girls reported higher levels of harassment and bullying on digital platforms.
- 2. Children's Feedback on Digital Learning and Safety:
  - Many children said they lacked digital literacy training and wished for better education on online risks.
  - Children called for stronger parental and teacher guidance to help them feel safe online.
- 3. Children's Suggestions:
  - Participants proposed the creation of safe online spaces, age-appropriate content controls, and more accountability for social media companies.
  - They emphasized the need for digital education in schools as part of their regular curriculum.
- 4. Quotes from Children:
  - A 13-year-old girl from Kenya said: *"I wish there were people we could talk to when someone harasses us online. Sometimes we are scared to tell our parents."*
  - A boy from Bolivia said: *"I want school to teach us how to use the internet better, not just how to turn on the computer."*

### Information or education to support parents of children at various age development stages

#### 2024 NZ Medical Journal: Digital Tech & Child Health

<https://bera-journals.onlinelibrary.wiley.com/doi/10.1002/rev3.70056>

#### Practical Guidance for Parents & Schools

- Encourage intentional screen use (learning, creativity) rather than passive consumption.
- Implement ergonomic practices: proper lighting, posture, regular breaks.
- Promote screen-free times: outdoor play, physical activity, social interactions.
- Support digital literacy education and awareness of healthy screen habits.

#### Key data points:

- NZ children average 42 hours/week of screen use (2012–2018), compared to global average of 35 hours/week
- NZ leads in classroom device and internet usage globally
- Significant harms observed with 2–6 hours/day of screen time in children over 5 years; 1 hour/day in younger children

Age Group	Screen Use Guidelines
0–2 yrs	No screen time; co-viewing only if needed. Limit sessions to 10–15 min if necessary .
2–5 yrs	Limit to 1 hr/day; ensure adult-supervised, intentional use .



<b>6–12 yrs</b>	Use limited to < 1/3 of school day; session max 20 min; include breaks, screen-free active times .
<b>13–18 yrs</b>	Encourage purposeful device use; breaks every 20 min; balance with outdoor activity .

## **APPENDIX TWO: REPORT CHILDREN AND YOUTH ONLINE SAFETY IN AOTEAROA NEW ZEALAND**