An Roinn Sláinte
Department of Health

Online Health Taskforce
Final Report

Online health and rights for Ireland's children and young people

September 2025

An Roinn Sláinte
Department of Health

Contents

1. Foreword from the Taskforce Chair

I am honoured to have been entrusted with the leadership of this important taskforce, established in September 2024 with terms of reference that guide our comprehensive approach to developing a public health response to the harms caused to children and young people by certain types of online activity. Our full mandate is set out in Appendix B. I am grateful for the continued commitment to this vital work, demonstrated by Minister Carroll MacNeill TD and set out in the 2025 Programme for Government, to addressing these complex challenges.

When I accepted the role as Chair of this Taskforce, I brought with me a deep conviction about the interconnected nature of children and young people's lives. Children and young people live in dynamic, intersectional, correlational digital, physical (offline), cultural and metaphysical spaces. Our analysis and recommendations must address risks in all of these interconnected environments to help them to thrive, as well as to protect them from harm.

This understanding has been central to our work from the outset. In the Interim Report, as Chair, I wrote an essay, "Rooted in Reality: Investing in Spaces to Thrive and Places to Belong for Ireland's Children and Young People," exploring how the digital landscape presents both unprecedented opportunities and significant risks for children and young people. However, addressing online harms cannot be separated from strengthening offline engagement opportunities. The need to invest in and strengthen offline spaces and places for young people is not separate from – but is integral to – addressing the challenges of the digital world.

The evidence we have examined consistently shows that Irish children and young people are spending increasing amounts of time online, often at the expense of physical activity, face-to-face social interaction, and participation in organised activities. Recent findings show a worrying decline in reported happiness among children and young people aged 10-17, from 88.2% in 2018 to just 78.5% in 2022 (Department of Children, Disability and Equality, 2025). This decline demands our urgent attention and a comprehensive response that recognises the holistic nature of their well-being.

Most importantly, our work has been fundamentally shaped by the voices of children and young people themselves. The National Youth Assembly on Youth Online Health, held in July 2025, provided invaluable direct insights that have been central to our deliberations. Young people identified six key priority areas – regulation, age restrictions, artificial intelligence, body image, healthy online spaces, and accessible language – that demonstrate both their sophisticated understanding of digital risks and their determination to be part of the solution. Their recommendations have not merely informed our work; they have been essential to it.

Our Taskforce has been guided by fundamental public health values: prevention of harm, protection of vulnerable populations, promotion of health and well-being, evidence-informed decision making, and prioritising children and young people's well-being over commercial

interests. We have drawn on multiple sources of evidence, including the Institute of Public Health's literature review, stakeholder consultations, and expert presentations. However, it is the authentic voices of young people that have provided the crucial foundation for our understanding.

Our recommendations are structured in two tiers: four Foundational Principles that establish the overarching policy direction, and ten Operational Recommendations across key domains. These must be considered as an integrated whole, with synergy between elements being essential to their effectiveness. The evidence consistently demonstrates that comprehensive, coordinated approaches are most likely to succeed in promoting population health, protecting vulnerable groups, and reducing digital health inequalities.

The declining happiness rates among Irish children and young people should serve as a national call to action that cannot afford piecemeal responses or delay. The recommendations in this report represent an urgent imperative for Government action – one that respects children and young people's rights, recognises both the benefits and risks of digital engagement, and calls for the investment in both digital safety measures and physical spaces that will enable Ireland's young people not merely to navigate these challenges, but to thrive.

This digital environment continues to evolve at an unprecedented pace, presenting both known and yet-to-be-discovered challenges that demand our ongoing vigilance. The increasing prevalence of Artificial Intelligence (AI) chatbots creating false relationships with children and young people, the emergence of AI-generated child sexual abuse material, and artificial intelligence's capacity to amplify harmful content represent just the current visible threats. As technology advances, new forms of harm will undoubtedly emerge that we cannot yet anticipate. Our understanding of these risks continues to deepen, and our responses must be equally dynamic and future-focussed. The recommendations we present are designed not only to address current known risks but to establish adaptive frameworks that can respond to emerging and unknown threats as they develop.

I extend my sincere gratitude to my fellow Taskforce members, whose expertise, dedication, and shared commitment to protecting the rights and well-being of Ireland's children and young people has been unwavering. I also thank the dedicated secretarial team for their professional guidance and support throughout this critical endeavour.

As we present these recommendations to the Minister for Health and Government, to address the harms caused to children and young people by certain types of online activity, we do so with the conviction that they represent a balanced, evidence-informed pathway forward that enables prompt and coordinated action across government.

Jillian van Turnhout
Chair of the Online Health Taskforce

2. Executive Summary

The Online Health Taskforce has developed a comprehensive framework to address the complex challenges facing children and young people in digital environments. Drawing on extensive evidence from the National Youth Assembly, stakeholder consultations, academic research, and expert analysis, these recommendations represent a balanced approach that recognises both the significant benefits and serious risks from online technology use.

This framework operates through two tiers: four Foundational Principles that establish the overarching policy direction, and ten Operational Recommendations that provide specific, actionable measures. These span five key domains: children and young people's rights, safety by design, critical digital literacy, enforcement and accountability, and regulatory frameworks.

The framework forms an integrated whole, with synergy between elements being essential to its effectiveness. Comprehensive, coordinated approaches are most likely to succeed in promoting population health, protecting vulnerable groups, and reducing digital health inequalities amongst Ireland's children and young people.

Foundational Principles

Four Foundational Principles are proposed:

1. The Irish Government must ensure that all of its actions and considerations afford children and young people their rights in the digital environment, equivalent to those in the physical world[1], including the right to health, privacy, safety, participation, freedom of expression, access to information and education, and protection from harm.

2. All relevant Irish Government strategies, legislative frameworks, funding allocations, and delivery mechanisms must work coherently[2] to ensure that all children and young people's spaces – online and offline – provide opportunities for them to be healthy and safe, to grow, to learn, to thrive, to explore and achieve.

3. The Irish Government should lead international cooperation to promote online health, well-being and safety, including supporting the implementation of international and national regulations.

4. A coordinated research strategy should be implemented that is proactive and responsive, in order to keep up with the fast pace of change in the digital environment, to promote health and well-being, and to support pre-emptive action to prevent future harm.

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[1] Including as proposed by the United Nations Committee on the Rights of the Child (United Nations, 2021).

[2] The United Nations Committee on the Rights of the Child identifies coordination as one of a number of general measures to implement children's rights (United Nations, 2021).

Operational Recommendations

Ten Operational Recommendations are proposed, grouped under five categories:

> a. The need for a Children and Young People's rights focus
>
> b. Safety by Design
>
> c. Critical digital literacy
>
> d. Enforcement and accountability
>
> e. European Union (EU) and national regulations

a) The need for a Children and Young People's Rights focus

Operational Recommendation One: In framing policies and strategies to promote health and well-being, to ensure online safety and to uphold children and young people's rights, attention must be given to all potential areas of risk, with solutions co-produced with all relevant stakeholders, most importantly with children and young people themselves.

Operational Recommendation Two: The Irish Government should mobilise existing mechanisms and, as necessary, establish new mechanisms for meaningful consultation with children and young people to ensure healthy and safe environments.

b) Safety by Design

Operational Recommendation Three: Ireland should advocate at EU level that all providers of digital products and services be required by regulation to incorporate "Child Rights by Design"[3] principles into the design, features, and functioning of their services and algorithms, encompassing the full spectrum of children and young people's rights including equity and diversity, best interests of the child, consultation, participation, age-appropriateness, privacy, safety, well-being, development, and agency. This is in line with the European Commission's guidelines under Article 28 of the Digital Services Act published in July 2025.

Operational Recommendation Four: The Irish Government should develop a two-stage regulatory approach that builds upon existing age classification frameworks, with implementation proceeding sector by sector: first establishing a comprehensive legally binding system that categorises digital products and services by age-appropriateness, then requiring providers within each sector to implement effective, privacy-preserving, and non-discriminatory age verification mechanisms, as appropriate, to enforce these classifications.

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[3] (Livingstone and Pothong, 2023).

c) Critical digital literacy

Operational Recommendation Five: Building on existing initiatives, an evidence-informed critical digital literacy campaign and educational programme should be implemented across Ireland. This should focus on the promotion of health and well-being, ensuring online safety and protecting children and young people's rights. The campaign and educational programme should aim to support not only children and young people, but also those who have caring responsibilities for them, including parents, carers, teachers, youth workers and relevant health professionals.

d) Enforcement and accountability

Operational Recommendation Six: The role that recommender systems play in recommending inappropriate or harmful content to children and young people needs to be addressed by platforms and regulators. Platforms need to ensure that there are effective measures in place to adequately mitigate the risks of children being recommended inappropriate or harmful content. Regulators need to supervise and enforce these obligations under the Digital Services Act (DSA), and in particular, the obligation to swiftly remove content that is illegal and/or harmful.[4] The exemption from liability for harmful but legal content on platforms should be reconsidered if the required steps are not taken by platforms to meet the requirements of the DSA and Online Safety and Media Regulation Act (OSMRA). Where existing legal frameworks prove insufficient to protect children and young people from algorithmic harms, additional regulatory measures should be developed.

Operational Recommendation Seven: Coimisiún na Meán must be adequately resourced through its levy-based funding system to deliver effective enforcement of online safety regulations, ensuring both proactive prevention of breaches and swift, robust responses to violations. To ensure appropriate Oireachtas scrutiny, Coimisiún na Meán should provide, in its annual report a comprehensive assessment of resource adequacy in protecting children and young people's health and well-being online. Any enforcement gaps or shortfalls can be reviewed by the Oireachtas so that the Government is enabled to take appropriate action.

Operational Recommendation Eight: The Irish Government should consider strengthening sanctions and accountability measures under the Online Safety and Media Regulation Act to ensure that Board Members and executives of bodies providing digital products and services are held appropriately accountable for certain breaches of online safety regulations affecting children and young people's health, safety and welfare.

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[4] This will require legislative measures, including EU wide legislation to counter CSAM as proposed in the EU Commission CSAM re-cast draft directive and its currently dormant draft Regulation.

e) EU and national regulations

Operational Recommendation Nine: The Irish Government should take a leadership role during its Presidency of the Council of the EU from July 2026, with the aim of encouraging collaboration and alignment of policy actions in the digital environment that will promote health and well-being, as well as ensuring safety and protecting children and young people's rights.

Operational Recommendation Ten: The Irish Government should support the development of the EU Digital Fairness Act (DFA). This Act would address problematic online practices not covered by existing EU consumer laws, and will aim to create a healthier and safer digital environment for all consumers, especially children and young people.

3. Background and Context

3.1 Policy Landscape

As documented in the Taskforce's Interim Report (Department of Health, 2025), a comprehensive horizon-scanning exercise identified and analysed existing cross-departmental initiatives addressing online safety. This mapping exercise informed the Taskforce's evidence-based approach and illuminated the complex policy landscape within which these recommendations operate.

3.2 Guiding principles: Public Health values

The Taskforce's approach was underpinned by public health values, which can be summarised as follows:

- Prevention of harm, through strategies to avert the occurrence of disease, at a population level

- Protection and safeguarding populations from health threats and ensuring that communities have safe and healthy environments

- Promotion of health education and resources to improve the health of populations through behaviour change and advocacy. It moves beyond a focus on individual behaviour towards a wide range of social and environmental interventions

- Policy developments based on health equity and social justice in health outcomes

- Evidence-informed decision making

- Collective responsibility and community engagement

- Transparency and accountability.

Guided by these values, the Taskforce has placed particular emphasis on the following:

- Recognising that online environments shape population health outcomes

- Understanding that individual "digital choices" are constrained by broader systemic factors

- Prioritising children and young people's well-being over commercial interests

- Ensuring equitable access to protective measures

- Making evidence-informed recommendations that serve the broader public good.

4. Informing our conclusions

The Taskforce has analysed multiple sources of evidence, in order to identify and bring forward recommendations that are informed, robust and practicable.

A wide range of literature and reports was considered to understand what problems needed to be addressed and to identify what solutions would likely be most effective. Targeted discussions took place with leading academics and subject matter experts from different disciplines to bring forward the best available evidence to inform our findings and recommendations.

Specific activities have included:

- The National Youth Assembly on Youth Online Health: "Creating Safe and Healthy Digital Spaces for Ireland's Young People", held on 9th July 2025, in Dublin was jointly convened by the Department of Health and the Department of Children, Disability, and Equality (DCDE). The Assembly's recommendations have been central to informing this report, ensuring the voices and lived experiences of young people—those most affected by online harms— directly informed our work. These recommendations are presented in full in the "National Youth Assembly report" (The National Youth Assembly on Youth Online Health, 2025). This standalone report will be published alongside this Taskforce report to provide the full context of youth voices in this process.

- A targeted approach to stakeholder engagement was employed through a structured consultation process, which gathered perspectives from a diverse range of stakeholders, including subject matter experts, professionals working in relevant fields, parents, and young people themselves. The responses were analysed to identify recurring concerns and suggested solutions.

- The Institute of Public Health (IPH) undertook research to examine children's engagement with marketing of specific health harming products, namely: tobacco, e-cigarettes, alcohol, sunbeds, gambling, and high fat, salt and sugar (HFSS) foods and drinks. Findings and recommendations are presented in full in the report, "Protecting children from harms online – a report on children's exposure to health harming products online and options to enhance protections in Ireland" (O'Connor, Reynolds and McAvoy, 2025), which forms part of this submission to the Minister.

- The Taskforce has engaged with relevant government departments to ensure our recommendations build upon existing policy frameworks, whilst addressing critical gaps in applying a public health approach to ensuring children and young people's health and well-being online.

An iterative approach was adopted as part of developing recommendations. Following initial analysis of all evidence strands, the Taskforce established focused subgroups to undertake

deep dives into specific thematic areas. These subgroups then brought their detailed analysis back to the full Taskforce for collective discussion, refinement, and final agreement on the recommendations.

4.1 National Youth Assembly Findings and Recommendations

The National Youth Assembly on Youth Online Health: 'Creating Safe and Healthy Digital Spaces for Ireland's Young People', held on 9th July 2025, identified six key themes to help shape the public health response to the harms caused to children and young people by certain types of online activity. These were: (1) Regulation; (2) Age Restrictions; (3) Artificial Intelligence; (4) Body Image; (5) Healthy Online Spaces; and (6) Language that Works. The Assembly's recommendations have been instrumental in focussing the Taskforce's attention on the specific issues that concern young people. These are summarised in the following table.

Recommendations from National Youth Assembly, 9th July 2025

Regulation:

- Real people should be monitoring platforms for violent, inappropriate and sexualised content accessible by under 18s, and not Artificial Intelligence. Such content should be restricted or potentially banned for under 18s.

- Ensure tech companies use clear and concise language in terms and conditions and legal documents to ensure that people can clearly read and understand them.

Age restrictions:

- There needs to be age verification in place, with ID/documents required.

- There should be bans and consequences for sharing intimate images.

Artificial Intelligence:

- There should be a ban on the distribution and creation of deepfake content online.

- Increase the education in schools about Artificial Intelligence, especially on how to use it sustainably and not become overly reliant on it.

Body Image:

- We recommend that the government should fund educational programmes based on body image, as it will help prevent things such as eating disorders and negative body image.

- We recommend a focus on primary students to prevent issues before they become prevalent in children's lives. Increase protections for children by increasing

transparency and accountability from influencers and corporations. This can be achieved through influencers disclosing photos that are edited, platforms hiding/ flagging content with edited or potentially harmful/unhealthy aspects for younger viewers and banning body image corporations from using targeted ads for younger users, e.g. shapewear, diets etc.

Healthy Online Spaces:

- Many apps overlook[5] harmful content and don't remove it. The responsibility for removing damaging content, e.g. N.S.F.W. (Not Safe For Work), should rest with the administrators of the platforms/apps.

- Platforms should make it more difficult for a user to make another account after being banned.

Language that works:

- While recognising the positive impact of friendlier language on young people's interactions, it is an issue that shouldn't be of such high importance to the Taskforce.

- Consultations on the topic of language should be carried out with young people, especially those under 18 years of age.

The independent youth-led analysis set out in the National Youth Assembly of Ireland report on Online Health provided valuable input to the Taskforce's deliberations. The Assembly's perspectives influenced the Taskforce's approach, but the recommendations represent the Taskforce's own conclusions. This standalone report will be published alongside this Taskforce report to provide the full context of youth voices in this process. (The National Youth Assembly on Youth Online Health, 2025).

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[5] Applications.

4.2 Stakeholder Consultation

A total of 86 responses were received by the Taskforce through an online consultation process, with a breakdown of the organisation type declared by submitters as follows:

Figure 1: Submission Organisation Types

Submission Organisation Types
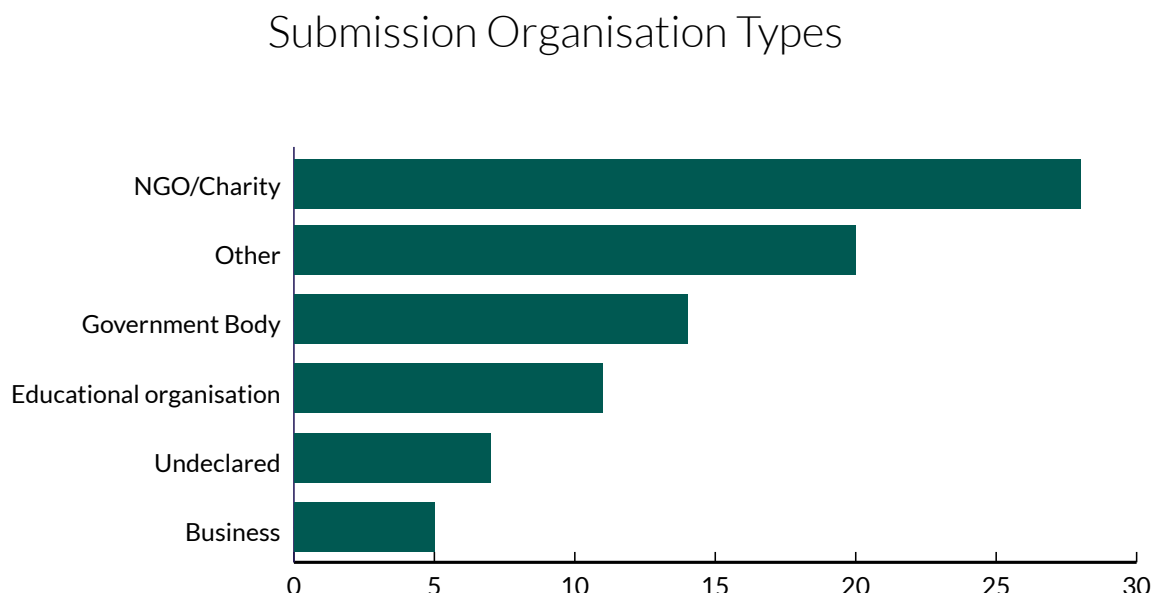
Through a semi-automated process based on hierarchical summarisation using a large language model[6], six key themes were identified as important within the submissions.

These themes were:

Theme 1. Regulation and Safety Measures:

- Implementing age verification to prevent underage access to inappropriate content Regulating online marketing and advertising to children, including restrictions on high fat, salt, and sugar (HFSS) food ads

- Introducing robust and transparent control measures to protect children from online harms.

Theme 2. Education and Awareness:

- Making online safety and critical digital literacy education an integral part of the curriculum from age 5 to 18

- Providing training and resources for teachers to teach online safety and critical digital literacy effectively.

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[6] After some preliminary experiments with a selection of large language models, a locally running version of the llama3.3 model (https://ollama.com/library/llama3.3) was used for this summarisation.

Theme 3. Parental Involvement and Responsibility:

- Encouraging parental buy-in and involvement in regulating children's online activities

- Providing parents with resources and guidance on how to have conversations with their children about online safety, mental health, and other issues

- Supporting parents in setting boundaries and monitoring their children's online activities.

Theme 4. Industry Involvement and Collaboration:

- Collaborating with industry leaders to develop age verification technologies and promote online safety

- Working with the Department of Education to supply children with secure phones and introduce gradual exposure to apps as they develop

- Encouraging tech companies to design products and services that prioritise children's safety and well-being.

Theme 5. Health and Well-being:

- Addressing the impact of social media[7] on children's self-esteem and mental health

- Reducing children's exposure to harmful online content, including misogyny and sexualisation of young girls

- Promoting healthy online behaviours, such as responsible social media usage and balanced screen time.


Theme 6. Access and Equality:

- Ensuring equal access to safe and secure online technologies for all children

- Providing a universal basic phone and software for school-aged youth to promote equality and safety

- Addressing the digital divide and ensuring that all children have access to the resources they need to stay safe online.

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[7] "Social media refers to websites and computer programs that make communication possible with the use of computers or mobile phones. Social media can take the singular or plural form of the verb."
www.collinsdictionary.com/dictionary/english/social-media.

Individual submissions were associated with multiple themes, and this grouping was used as a way to organise the submissions for review. These identified priority themes were considered by the Taskforce as part of the evidence used to form its conclusions and recommendations. The frequency of assignment of these themes is shown below.

Figure 2: Theme Frequencies

Theme Frequencies
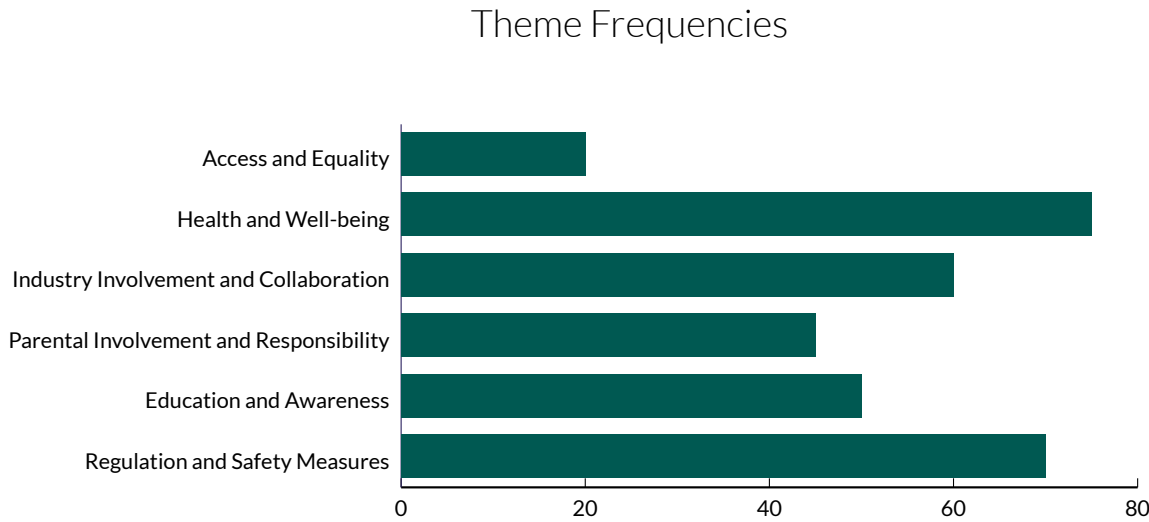
A similar approach, using a large language model, was also used to generate short summaries of each submission. These were reviewed and revised by a member of the taskforce team and were used as submission abstracts.

4.3 Report by the Institute of Public Health (IPH)

"Protecting children from harms online – a report on children's exposure to health harming products online and options to enhance protections in Ireland"

The IPH report defines digital marketing as,

> *"multiple activities interacting in a variety of ways, across a variety of platforms and utilising data to inform targeting and profiling of customers"*
> *O'Connor, Reynolds and McAvoy, 2025 p.39) .*

In doing so, it recognises that,

> *"The power differential between an individual child and the commercial companies involved in data driven digital marketing of health harming products is profound"*
> *(O'Connor, Reynolds and McAvoy, 2025).*

IPH suggests four areas where change might deliver better protection from digital marketing of health-harming products, as follows:

1. Political and policy leadership

2. Reform of legislative and enforcement mechanisms

3. Better age verification

4. Establishing of systems of monitoring and observability.

IPH proposes four cross-cutting priorities alongside specific actions for each product type.

The full IPH report has been published separately and it should be regarded as complementary to this report (O'Connor, Reynolds and McAvoy, 2025).

5. Foundational Principles

In analysing research and reaching its conclusions, the Taskforce recognises that evidence in relation to digital health benefits, risks and harms is still emerging in a complex and dynamic environment. To some extent, policy initiatives in this area are necessarily experimental, given the evolving nature of digital technologies. Evidence on the nature, strength and direction of the relationship between young people's technology[8] use and impacts on depression, anxiety and suicide-related behaviours; psychological and emotional well-being; social well-being; and behavioural, physical and development remains mixed (The Lancet, 2024; World Health Organization European Region, 2025a). As well as this, as previously expressed in the Interim Report of the Online Health Taskforce,

> *"The interconnected nature of children's and young people's experiences demands a comprehensive approach that transcends traditional boundaries between digital and physical realms...challenging us to reimagine how we support their well-being and development", and requiring a Public Health "whole-of-government approach that prioritises creating meaningful spaces and supportive environments for our children and young people."*
> *Jillian van Turnhout, Chair OHT (Department of Health, 2025)*

Four Foundational Principles

Four Foundational Principles are proposed, emphasising a Children and Young People's Rights approach to decision-making that balances:

- The potential and actual benefits of digital products and services for young people, with

- recognising the potential and actual harms of digital products and services for young people.

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[8] In making these comments, the WHO report uses "technology" and "social media" use interchangeably (World Health Organization European Region, 2025a).

The Foundational Principles and the associated Operational Recommendations should be considered as an integrated framework, with synergy between all elements being seen as essential to overall effectiveness. Evidence demonstrates that comprehensive, coordinated approaches are most successful in promoting population health, reducing risks to the most vulnerable populations and reducing health inequalities.

Four Foundational Principles are proposed:

1. The Irish Government must ensure that all of its actions and considerations afford children and young people their rights in the digital environment, equivalent to those in the physical world[9], including the right to health, privacy, safety, participation, freedom of expression, access to information and education, and protection from harm.

2. All relevant Irish Government strategies, legislative frameworks, funding allocations, and delivery mechanisms must work coherently[10] to ensure that all children and young people's spaces – online and offline – provide opportunities for them to be healthy and safe, to grow, to learn, to thrive, to explore and achieve.

3. The Irish Government should lead international cooperation to promote online health, well-being and safety, including supporting the implementation of international and national regulations.

4. A coordinated research strategy should be implemented that is proactive and responsive, in order to keep up with the fast pace of change in the digital environment, to promote health and well-being, and to support pre-emptive action to prevent future harm.

The potential and actual benefits of social media for young people

Many papers discuss the benefits of social media (for example, French, 2024; Fox, Robertson and Lunn, 2025; Manolios *et al*., 2025; OECD, 2025). These include its ability to connect people and their ideas and experiences, to provide opportunities for personal and creative self-expression, and to educate (French, 2024). In relation to the latter, the opportunities provided by digital technologies to allow students to engage in self-directed learning, to collaborate on group projects, to exchange ideas about homework and to enhance and consolidate learning on an "almost inexhaustible range of topics" have also been highlighted (The Royal Australian & New Zealand College of Psychiatrists, 2018). Electronic games and devices can be used to

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[9] Including as proposed by the United Nations Committee on the Rights of the Child: "General comment No. 25 (2021) on children's rights in relation to the digital environment".

[10] The United Nations Committee on the Rights of the Child identifies coordination as one of a number of general measures to implement children's rights (United Nations, 2021).

increase physical activity in children and young people, to provide information about physical and psychological health problems which may promote engagement with health-care services (The Royal Australian & New Zealand College of Psychiatrists, 2018). Social media can be used to encourage healthy activity, enhance medication adherence, support smoking cessation and support mental health (eSafety Commissioner, 2024; French, 2024). Digital technologies can be utilised to reduce health inequalities at a population level, for example by improving access to treatment and other supports in remote and rural areas (French, 2024).

The relationship between use of technology and children and young people's mental health and well-being is complex and bidirectional (Office of the Surgeon General (OSG), 2023; McGorry *et al*., 2024; The Lancet, 2024; OECD, 2025b; The Psychological Society of Ireland (PSI) Special Interest Group in Perinatal and Infant Mental Health (SIGPIMH), 2025). Evidence underlines that impacts on children's well-being from their digital engagement are affected by a range of intersecting factors, including the type of digital activity, the gender, socioeconomic circumstances and developmental stage of the individual child, as well as their cultural and social contexts" (Fox, Robertson and Lunn, 2025).

A review by The Lancet Psychiatry Commission on young people's mental health in 2024 suggested that digital and mobile technologies can provide opportunities to redesign and improve mental health services. These include offering patients opportunities to access therapeutic platforms of care that can be integrated within face-to-face care systems, as well as reducing the risk of suicide and self-harm, depression, and harms due to alcohol consumption. Although evidence is still emerging, an online intervention in Australia, which had the sole aim of increasing access to mental health care for young people, led to improvements to young people's quality of life, as well as being cost-effective compared with usual care (McGorry *et al*., 2024).

Finally, and importantly, from a children and young people's rights perspective, from around the world, there is strong evidence that children view access to digital technologies as essential for exercising their rights to information and meaningful participation in society (Fox, Robertson and Lunn, 2025).

The potential and actual harms of social media for children and young people

Alongside evidence of the benefits that social media can bring, there is an extensive and growing body of research demonstrating significant harms associated with its use. The United Nations Committee on the Rights of the Child (UNCRC, 2021), in its General Comment No. 25 on children's rights in relation to the digital environment, warned that the digital environment may create new avenues for violence against children by facilitating situations in which they experience abuse or are influenced to harm themselves or others (United Nations, 2021). The Committee highlighted risks including,

> *"physical or mental violence, injury or abuse, neglect or maltreatment, exploitation and abuse, including sexual exploitation and abuse, child trafficking, gender-based violence, cyberaggression, cyberattacks and information warfare" (United Nations, 2021)*

UNCRC also emphasises the potential for non-State actors, including terrorist or violent extremist groups, to use digital environments to recruit and exploit children, emphasising that children who are accused of criminal offences in this context should be primarily treated as victims, and that the child justice system should apply (United Nations, 2021).

The Office of the eSafety Commissioner in Australia has summarised online harms under six key areas:

> *"Personal safety harms — e.g. direct and indirect threats or facilitation of violence; intimidation and harassment; viral challenges;*
>
> *Health and well-being harms — self harm and suicide material — material promoting eating disorders and exposure to development mentally inappropriate conduct;*
>
> *Harms to dignity — insulting and demeaning comments and trolling;*
>
> *Privacy harms including doxing, sexual extortion and image-based abuse;*
>
> *Harms involving discrimination, including hate speech, racism, misogyny, sexual harassment, homophobia and transphobia;*
>
> *Harms involving perception and manipulation, including grooming of children"*
>
> *(eSafety Commissioner, 2024, pp. 36 - 37).*

There is substantial evidence that, as well as serving as a channel for false and harmful content, social media can provide a platform for bullying, exploitation, and predation (French, 2024). A growing body of research also highlights the way that gaming apps devices and content are designed can lead to stress and anxiety for children and young people (Ging, 2017; CyberSafeKids, 2024; PA Consulting Group, 2024; Ó Ceallaigh *et al.*, 2024; OECD, 2025b).

Population level risks of harm are exacerbated by the fact that digital technologies have become deeply embedded in children and young people's daily lives, with negative impacts on sleep patterns, attention issues, physical development, and mental health, including anxiety and depression (Kelly *et al.*, 2018; Girela-Serrano *et al.*, 2024; OECD, 2025b). Harms are not evenly distributed; research shows, for example, that girls are regularly exposed to dangerous dieting and pro-anorexia content (Blackburn and Hogg, 2024), which negatively impacts body image and disordered eating (Dane and Bhatia, 2023). Meanwhile, boys are being targeted with male supremacist content (Baker, Ging and Andreasen, 2024), which can increase misogynist attitudes and behaviours (Roberts and Wescott, 2024). In 2020, young people in Australia described the following as their most frequent negative experiences: being contacted by a stranger (30%), receiving unwanted explicit content (20%), and being deliberately excluded from social groups (16%). These experiences were more commonly reported by older adolescents and females (French, 2024).

The Royal Australian & New Zealand College of Psychiatrists has coined the term "Problem Internet Use" (PIU), which has become widely accepted as implying very serious harms, as follows,

> *"the pervasive long-term and heavy use by a person of internet and computer-based technologies, including gaming, that is out of keeping with one's educational, social or occupational role, wellbeing and health" (The Royal Australian & New Zealand College of Psychiatrists, 2018)*

Evidence suggests that, in severe cases, PIU can be considered an addictive condition, marked by dependence, mood alteration, tolerance, withdrawal, and harm to psychosocial functioning (The Royal Australian & New Zealand College of Psychiatrists, 2018). Harms can be instigated by the actions of others, such as 'cyberbullying'; i.e. deliberately using digital media to communicate false, embarrassing or hostile information about another person. This can lead to depression, other mental health problems and suicide. Risks include the sexualisation of children and young people, imposition of adult sexual norms at inappropriate developmental stages and aggression (The Royal Australian & New Zealand College of Psychiatrists, 2018), as well as dangers related to young people exposing personal information (for example, images, date of birth, or details that can be used to triangulate the child's physical location (Office of the Surgeon General (OSG), 2023).

Researchers argue that the harms associated with online pornography include that it shapes the sexual expectations of children and young people in ways that normalise harmful, coercive, dangerous, and abusive behaviours. It is proposed that it reinforces misogynistic and disrespectful stereotypes and undermines any educational work on consent, on safe, healthy and respectful relationships and towards gender equality (Breslin and O'Connor, 2024). Specific risks and harms have been associated with widespread exposure to (violent) pornography (McLaughlin, 2023), whose sexual scripts normalise violence against women (Vera-Gray *et al.*, 2021). It is suggested that easy access to violent pornography distorts a child's sense of consent as well as their attitude towards behaviours such as choking as sexual 'norms' (Irish Medical Organisation, 2025; Press Association: The Journal, 2025).

Research suggests that additional risks are posed by Artificial Intelligence (A.I.), with reported increases in A.I. generated child sex abuse material and A.I. bots[11] acting as friends for children, sometimes with a sexual dimension, providing them with misleading advice including in relation to mental health (Internet Watch Foundation and A.R.U. Policing Institute for the Eastern Region, 2023; Children's Rights Alliance, 2025d).

A substantial and growing body of evidence describes the online risks that children and young people in Ireland specifically face. The EU Kids Online '4 Cs Framework' in Figure 3 below categorises them as contact, content, conduct, and contract risks. An important review in 2023-24, provided a range of examples that provide evidence of what it described as the "virtually unprotected lives of kids in Ireland" (CyberSafeKids, 2024).

Figure 3: The EU Kids Online 4CS model of online risks
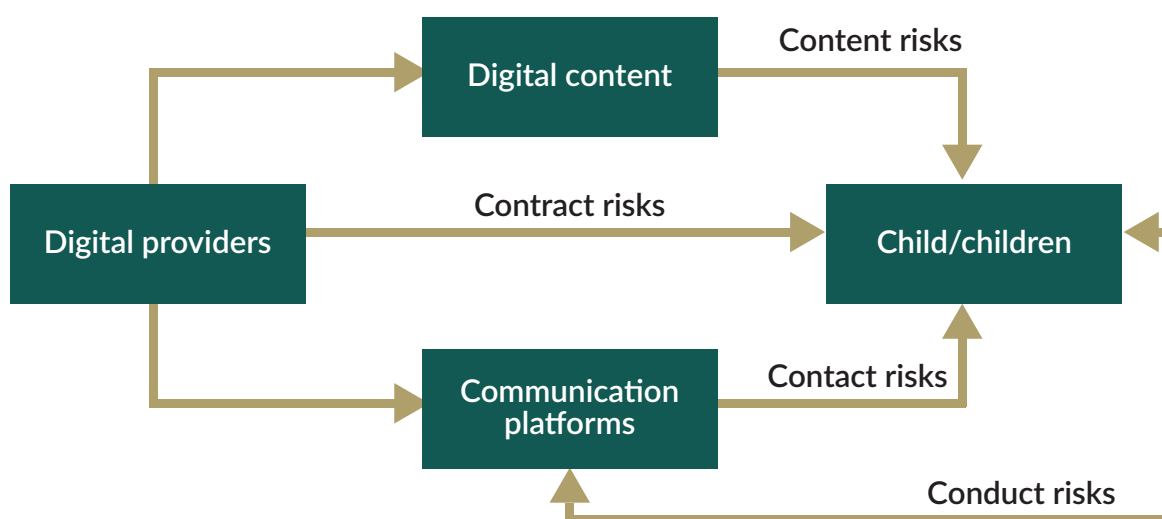
(Livingstone and Stoilova, 2021)

Media reports have indicated that image-based sexual abuse and deepfake pornography may be increasing in Ireland (De Vaal, 2022) and that there has been a sharp rise in sexual images generated by children in Irish primary schools (O'Brien, 2021).

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[11] "A bot is a computer program that carries out tasks for other programs or users, especially on the internet."
www.collinsdictionary.com/dictionary/english/bot

Screen time

The impact of screen time and social media use on children's mental and physical health" is complex and multifaceted" (Manolios *et al.*, 2025, p. 15) and the available evidence suggests caution in applying over-general risk assessment criteria to individual contexts (French, 2024). Heavy social media use may not be as harmful to mentally healthy and socially integrated young people, but it can exacerbate mental health distress in more vulnerable individuals (World Health Organization European Region, 2025a). Establishing a clear causal link between exposure to online risks and negative mental health outcomes has proven challenging (World Health Organization European Region, 2025a) and effects are likely to be non-linear, bidirectional and shaped by socioeconomic factors, the child's gender, developmental stage and cultural and social context (Fox, Robertson and Lunn, 2025).

With those qualifications, the amount of time young people spend online has been associated in several studies with increased risk of harms. High screen time has been associated with disrupted sleep, reduced physical activity, obesity, anxiety, depression, and negative effects on neurocognitive development (OECD, 2025b; World Health Organization European Region, 2025a).

A review of evidence by the Psychological Society of Ireland suggested that prolonged screen use by parents and their children can disrupt parent and child and other social relationships, also potentially contributing to behavioural and emotional regulation issues in children and young people. Evidence also suggests that excessive passive screen exposure is associated with delayed cognitive development, speech delays, inattention and poorer social skills in infants and young children, as well as lower levels of physical activity and higher rates of obesity. Young people from lower socioeconomic status (SES) backgrounds use screens more frequently and experience more harm from their digital experiences than children and young people from households with a higher SES. Health inequalities are increased when screen use displaces time that could otherwise be spent engaging in health-promoting activities, such as physical exercise, sleep, and social interaction (The Psychological Society of Ireland (PSI) Special Interest Group in Perinatal and Infant Mental Health (SIGPIMH), 2025).

6. Operational Recommendations

Chapter six summarises specific evidence that support the Operational Recommendations that are presented, these being grouped under five categories:

a) The need for a Children and Young People's Rights focus

b) Safety by Design

c) Critical digital literacy

d) Enforcement and accountability

e) EU and national regulations

a) The need for a Children and Young People's Rights focus

Operational Recommendation One: In framing policies and strategies to promote health and well-being, to ensure online safety and to uphold children and young people's rights, attention must be given to all potential areas of risk, with solutions co-produced with all relevant stakeholders, most importantly with children and young people themselves.

Areas of risk include:

- Online content, including violent, hateful or pornographic material, as well as any other content deemed harmful or unsuitable for a young person's healthy development.

- Exposure to and creation of child sexual abuse material (CSAM), including A.I.-generated content and deepfake imagery.

- Harmful and/or unwanted contact, including harassment and grooming for sexual or violent purposes or for trafficking.

- Addictive design, including use of algorithms that manipulate children and young people's behaviour to lead them to conduct themselves in online contexts in ways that can harm themselves and others, for example, engaging in bullying behaviours, abuse or violence; carrying out risky challenges; oversharing personal information; adopting unhealthy behaviours, such as slimming challenges; engaging in criminal behaviours, such as cyber-attacks.

- Commercial exploitation and manipulation, including exploiting children and young people's attention, data, or purchasing via persuasive design and profiling; exposure to promotion of pornographic images and videos; marketing of health-harming products, such as tobacco, e-cigarettes, alcohol, sunbeds, gambling and high fat, salt, sugar (HFSS) foods and drinks.

Risks of harm are also associated with pervasive long-term and heavy internet use, that is associated with negative impacts on sleep patterns, physical development, and mental health, including anxiety and depression.

As well as prioritising a children and young people's rights approach in policy development and implementation, there is a need to adopt a 'balanced' and evidence-informed approach, recognising the complexity of the issues that need to be addressed and how they often compete with each other, as well as the fact that risks of harm are greater for already disadvantaged populations.

Operational Recommendation Two: The Irish Government should mobilise existing mechanisms and, as necessary, establish new mechanisms for meaningful consultation with children and young people to ensure healthy and safe environments.

Implementation could include:

- Prioritising "Child Rights by Design" principles (Livingstone and Pothong, 2023), establishing advisory mechanisms so as to embed children and young people's voices, including those from diverse socio-economic backgrounds and social groups, in policy development processes through structured consultation mechanisms

- Ensuring that Child Rights Impact Assessments (CRIA) by platforms include direct inputs from children and young people[12]

- A review by the Department of Children, Disability and Equality (DCDE), along with Tusla, of the national Child Protection and Welfare guidance, to include the risk of digital harms, including cyber bullying, abuse and exploitation

- Engaging children and young people in developing responses to specific risks posed by influencers, blogs and vlogs.

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[12] EU guidelines propose CRIA, with children's involvement (European Commission, 2025b). UNICEF has also undertaken extensive work on Digital CRIA (UNICEF, 2025).

A number of themes recur through academic papers and reports from in-depth and expert reviews, as well as advocacy groups that have considered what to do to prevent, and to mitigate, risks of harm to children and young people from digital environments, including social media. Two key themes relate to principles:

- Most importantly, the importance of prioritising child and young people's rights approach in policy development and implementation

- The need to adopt a 'balanced' and evidence-informed approach, recognising the complexity of the issues that need to be addressed and how they often compete with each other.

Children and young people's rights

Most studies and reports highlight the need to place children and young people's rights at the centre of online safety policies (for example, United Nations, 2021; Livingstone and Pothong, 2023; OECD, 2025) emphasise an approach to online safety that focusses on supporting children and young people's rights to health and welfare, education, leisure and cultural activities, as well as the right to be protected from economic, sexual and other forms of exploitation in all digital environments.

By engaging with children and young people when developing policies, legislation, programmes, services and training on children and young people's rights in relation to the digital environment, the UNCRC urges governments to involve all children, listen to their needs and give due weight to their views. UNCRC also argues that states should be responsible to ensure that digital service providers actively engage with children, applying appropriate safeguards, and give their views due consideration when developing products and services (United Nations, 2021).

By ensuring that young people are actively involved in shaping the policies that affect them—from consultation to implementation and evaluation, a child and young people's rights approach can uphold young people's rights to privacy, participation and access to information, also enabling them to care for others online (Manolios *et al.*, 2025), as well as reducing risks of harms (Doyle *et al.*, 2025). Experts (for example, Manolios *et al.*, 2025) suggest the usefulness of designers of digital products and services drawing on children and young people's views at design stage and it has also been recommended that all future digital policies should undergo youth-informed impact assessments to evaluate potential effects on mental health, equity, and rights (Doyle *et al.*, 2025). In Ireland, the Children's Rights Alliance (2025) has outlined concrete measures to embed this approach. These include amending the Online Safety and Media Regulation Act (OSMRA) to prioritise the best interests of the child and expanding Coimisiún na Meán's Youth Advisory Committee to include direct representation from under-18s (Children's Rights Alliance, 2025a, 2025b).

A balanced and evidence-informed approach

Enhancing child well-being in the digital age requires a holistic understanding of the benefits and risks associated with online environments, underpinned by strong legal and policy frameworks (OECD, 2021). Reports consistently stress that children and young people should not only be protected from online harms, and they should also be supported to access the benefits of digital connectivity, creativity, and community (Doyle *et al.*, 2025). Algorithms can be curated to offer good "rabbit holes" for exploration (Manolios *et al.*, 2025).

The Organisation for Economic Co-operation and Development (OECD) notes that,

> *"Healthy digital practices for children include balanced screen time, safe and positive online interactions, participation in offline activities like play and exercise, and protection from harmful or inappropriate content. Helping children develop such practices is essential for their well-being and rights during childhood, while also preparing them for life online as adults and equipping them with the digital skills needed for adulthood. Managing risks associated with digital technologies and media for children involves promoting offline well-being and addressing real-life vulnerabilities that may lead to the development of problematic digital habits"* (OECD, 2025b).

The Psychological Society of Ireland similarly emphasises that,

> *"a balanced approach must be prioritised, one that includes healthy digital engagement alongside offline activities that promote physical, emotional, and social wellbeing"* (The Psychological Society of Ireland (PSI) Special Interest Group in Perinatal and Infant Mental Health (SIGPIMH), 2025, p. 3).

Addressing these challenges requires all stakeholders—children, parents, educators, researchers, regulators, and technology companies—to work together, with strategies that account for diversity in children and young people's needs and experiences (Manolios *et al.*, 2025).

Banning use of smart devices by children

Evidence is mixed on the impacts that banning children from using digital technology might have. The Australian Child Rights Taskforce has argued that bans on smartphone use by children are "too blunt an instrument" and instead called for systemic regulation that holds platforms accountable while building user awareness of risk and responsibility (Australian Child Rights Task Force, 2024). Evidence would seem to support a harm-reduction approach, supporting young people to navigate digital life safely and make informed choices, rather than aiming to restrict or avoid use altogether (Doyle *et al.*, 2025); more than this, it is possible that smartphone bans in schools could have unintended negative consequences (Reynolds, Esfandiari and O'Higgins Norman, 2025).

Where children and young people have been consulted, research suggests that students prefer education on safe use over restrictive bans and that schools should focus on empowerment and mental health support rather than prohibitive measures (Reynolds, Esfandiari and O'Higgins Norman, 2025). This approach has recently been reinforced by the findings of a new report by the Ombudsman for Children's Office (OCO), representing the views of its Youth Advisory Panel (YAP) and responding to the Irish Government's announcement that there would be a ban on smartphones in schools (O'Brien, 2024), which drew on the UNCRC's recommendations (United Nations, 2021) to call for,

"a shift away from paternalistic approaches that view children as victims needing protection from harm to an approach that respects children as holders of a range of civil, political, social and economic rights, with decisions made in collaboration with children, rather than about them" (Ombudsman for Children's Office, 2025, p. 7).

The YAP went on to make the following specific recommendations:

"1. Do not introduce blanket bans in schools. Consider the impact on children's rights, particularly the right to have a say, as well as the diversity of individual schools and students when rules around phones are being designed.

2. Invest more in resources for digital education and improving schools, instead of phone pouches.

3. Carry out more research and communicate this research in a child-friendly way to young people, so they understand the evidence behind decisions that are being made.

4. Design different approaches to phone rules depending on the age and maturity levels of children.

5. Increase support, education and awareness for parents, teachers and other adults to better understand technology and better support students through the challenges they are facing" (Ombudsman for Children's Office, 2025).

b) Safety by Design

> **Operational Recommendation Three: Ireland should advocate at EU level that all providers of digital products and services be required by regulation to incorporate "Child Rights by Design"[13] principles into the design, features, and functioning of their services and algorithms, encompassing the full spectrum of children and young people's rights by design principles including equity and diversity, best interests of the child, consultation, participation, age-appropriateness, privacy, safety, well-being, development, and agency. This is in line with the European Commission's guidelines under Article 28 of the Digital Services Act published in July 2025.**
>
> To incentivise proactive implementation and reduce regulatory burden for compliant providers, we recommend Ireland champion a tiered regulatory framework that includes:
>
> - An enhanced regulatory flexibility for compliant providers
>
> - Streamlined compliance processes and reduced reporting requirements for digital products and services that demonstrate embedded "Child Rights by Design" principles[14] across all 11 core areas
>
> - Fast-track approval processes and exemptions from prescriptive regulations for certified children and young people-safe digital services
>
> - Reduced regulatory oversight frequency for consistently compliant providers.
>
> Digital Child Safety Certification: Mirroring the CE marking system for physical toys[15], Ireland should advocate for an EU-wide certification scheme potentially requiring:
>
> - Pre-market assessment against "Child Rights by Design" principles, including mandatory children and young people consultation processes
>
> - Transparent certification display enabling informed parental and child/young person choice
>
> - Periodic re-certification ensuring ongoing compliance with evolving children and young people's rights standards.

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[13] (Livingstone and Pothong, 2023).

[14] "Child Rights by Design" Principles: (1) Equity and Diversity, (2) Best Interests, (3) Consultation, (4) Age Appropriateness, (5) Responsibility, (6) Participation, (7) Privacy, (8) Safety, (9) Wellbeing, (10) Development, and (11) Agency (see: https://cms.child rightsbydesign.5rightsfoundation.com/wp-content/uploads/2023/04/CRbD-spread_web.pdf).

[15] CE Mark for Children's Toys: The original EU directive governing toy safety, Directive 88/378/EEC, was adopted in 1988 and required toys to meet essential safety standards and be marked with CE before sale. This was significantly strengthened by Directive 2009/48/EC, adopted in June 2009, which enhanced requirements particularly in areas like chemical safety and risk assessment. This framework ensures 15 EU children's toys are among the safest in the world, with the CE mark acting as a visible guarantee of compliance with rigorous European standards.

Retrofitting incentives for existing providers: Ireland should also advocate for:

- Phased compliance timelines allowing systematic redesign of core systems and business models

- Technical assistance programmes supporting implementation across the 11 'Child Rights by Design' principles

- Incentives for digital products and services exceeding minimum requirements.

This approach creates competitive advantages for comprehensive children and young people's rights implementation whilst ensuring all digital products and services move beyond narrow safety measures to embrace children and young people's full spectrum of digital rights.

Operational Recommendation Four: The Irish Government should develop a two-stage regulatory approach that builds upon existing age classification frameworks, with implementation proceeding sector by sector: first establishing a comprehensive legally binding system that categorises digital products and services by age-appropriateness, then requiring providers within each sector to implement effective, privacy-preserving, and non-discriminatory age verification mechanisms, as appropriate, to enforce these classifications.

This should be enacted through appropriate legislation, developed in collaboration with relevant stakeholders, extending the Online Safety Framework introduced by Coimisiún na Meán and aligning with and promoting good safeguards that exist already, rather than replacing them.

Acceptable age verification methods should require minimal, privacy-respecting data collection and could be based on state-assured safe and secure digital identity services.

Addressing the systemic nature of online dangers, which are embedded in digital platforms, requires systemic solutions that go beyond individual user responsibility (Fox, Robertson and Lunn, 2025). The "Child Rights by Design" framework advocates for proactively embedding child protection into service development, making safety enforceable and central to digital design from the outset (Livingstone and Pothong, 2023).

Recommender systems and algorithms

Recommender systems and algorithms, sometimes described as "A.I. systems that profile individuals' behaviour to determine what content to show them to keep them engaged" (Irish Council for Civil Liberties, 2024). These pose significant risks of harms to children as they actively curate and direct content, profoundly influencing information flows with unprecedented control (Presuel and Martinez Sierra, 2019).

There is strong evidence that algorithms frequently push exploitative, abusive, sensational or extreme content, exposing children and young people to harmful material such as misogynistic, abusive, extremist, and self-harm related content (Breslin and O'Connor, 2024; Children's Rights Alliance, 2025c; Fox, Robertson and Lunn, 2025; OECD, 2025b; World Health Organization European Region, 2025a). It has been argued that such exposure can lead to anxiety, depression, self-harm, and may inadvertently encourage actual abuse as well as unethical, and sometimes criminal, behaviours in children and young people (OECD, 2025b).

Examples of harmful content, specifically through algorithmic recommendations include:

- An analysis of 1,000 YouTube video recommendations to 13-year-olds found examples of harmful eating disorder videos, including the "ABC "Anorexia Boot Camp" Diet of 0-500 calories for 30 days", "Thinspiration" videos presenting skeletal bodies as inspiring and "What I Eat in a Day" videos showing extreme calorie restriction" (Center for countering digital hate, 2024).

- An Irish study reviewing YouTube and TikTok shorts found evidence that boys are being targeted by high profile "manosphere" influencers:

> *"The study demonstrates that all of the male identified accounts, whether they sought out gender-normative or manosphere-related content, were fed masculinist, anti-feminist and other extremist content and that, once the account showed interest by watching this sort of content, the amount rapidly increased" (Baker, Ging and Andreasen, 2024).*

There have been many calls for greater transparency regarding algorithms and increased accessibility of platform data for independent researchers to assess and understand personalisation-driven harms (Baker, Ging and Andreasen, 2024; Fox, Robertson and Lunn,

2025). Coimisiún na Meán has stressed that recommender systems not designed with safety in mind are "likely to be unsafe for minors" (Children's Rights Alliance, 2025c, p. 294).

While the EU's Digital Services Act (European Union, 2022), which came into effect in Ireland in February 2024, has made strides in requiring transparency for algorithms and systemic risk assessments for very large online platforms (VLOPs) and very large online search engines (VLOSEs), concerns have been expressed that it does not address sufficiently the issues that give rise to potential harms. Critics argue that companies providing online platforms and services are not doing enough to prevent negative health impacts on children and young people of online activity (O'Halloran, Meehan and Heffron, 2025, p. 12).

Age assurance

While there is some debate as to the consistency and scale of risks and harms caused by digital technologies (Odgers and Jensen, 2020; Orben, 2020), there is wide-spread agreement that certain online content and experiences should not be accessible to children and young people (Livingstone and Stoilova, 2021; OECD, 2024). Consequently, many online digital technologies have stated age limits to protect children and young people from accessing them (age limits usually fall between 13 and 18) (Curley, 2020).

Recent legislation has aimed to enforce age verification in the digital environment. The European Union (EU) introduced the Digital Services Act in 2022 (European Union, 2022) which came into effect in Ireland in February 2024. At the same time in Ireland, provisions of the Online Safety Code introduced by Coimisiún na Meán enforced robust age verification requirements on video sharing platforms with their headquarters in Ireland to prevent access to harmful content (Department of Tourism, Culture, Arts, Gaeltacht, Sport and Media, 2022). These provisions, however, are limited and only apply to a narrow band of online digital services, with flexibility in their recommendations so that means that risks remain that children and young people will be exposed to health-harming products and services.

An emerging body of research discusses the effectiveness of different age assurance methods (for example, Hanaoka *et al.*, 2024; OECD, 2025a). This suggests there is a trade-off between the effectiveness of the approaches and the level of data disclosure and infrastructure required to implement them. However, many of the current approaches to age verification used to prevent younger users from accessing online digital technologies are largely ineffective (Curley, 2020; OECD, 2025a). The 2025 CyberSafeKids Ireland survey showed that 71% of 8-12 year olds in Ireland have social media and instant messaging accounts, despite the fact that most platforms have a minimum age requirement of 13 (CyberSafeKids, 2025). Age verification can typically be bypassed with false information or technical workarounds (Australian Government, 2025). Even with stronger checks, users often sidestep restrictions using VPNs; for instance, when Pornhub exited France in June 2025, it was reported that ProtonVPN[16] registrations surged by 1,000 percent (Mashable publication, 2025).

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[16] Proton VPN's website https://bit.ly/470kamc advertises, "Bypass censorship and g*et all* sides of the story: With Stealth, our custom VPN protocol, you can bypass government restrictions to access censored sites and social media while disguising your VPN connection.

Nonetheless, evidence from other contexts suggests that the use of age assurance can be effective in reducing access of children and young people to prohibited activities and items; for example gambling (Government of Ireland, 2024a) and tobacco (Health Service Executive, 2022). As well as this, lessons can be learned for the Irish context from efforts to improve age verification systems elsewhere, including at local, national and transnational levels (Australian Government, 2025; UK Government, 2023; European Commission, 2024, 2025a, 2025b; The European Data Protection Board, 2025).

c) Critical digital literacy

Operational Recommendation Five: Building on existing initiatives, an evidence-informed critical digital literacy campaign and educational programme should be implemented across Ireland. This should focus on the promotion of health and well-being, ensuring online safety and protecting children and young people's rights. The campaign and educational programme should aim to support not only children and young people, but also those who have caring responsibilities for them, including parents, carers, teachers, youth workers and relevant health professionals.

- The Digital Literacy Competencies[17] should be used as a starting point to develop an age-appropriate programme for children and young people, embedded through the whole school curriculum and with a focus on achieving positive health outcomes.

- With a view to implementing a cross-curricular programme of critical digital literacy in schools, all third level providers of recognised teacher training qualifications for all ages of children and young people should be required to include a mandatory core module in supporting healthy online behaviours, related to the educator's subject of expertise and practice.

- Continuous professional development opportunities and resource should be provided for teachers, youth workers and relevant health professionals, enabling them to work in partnership with parents and other carers to support children and young people's online health.

- A rolling public awareness campaign, with tailored resources for parents and carers, should be implemented, with an aim of engaging all members of the community, and including disadvantaged populations, in promoting healthy online behaviours.

- The Irish government should prohibit technology companies from partnering with schools on the development of educational resources focussed on promoting health and well-being and/or safeguarding.

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[17] Laid out in "Ireland's Literacy, Numeracy and Digital Literacy Strategy, 2024-2033" (Government of Ireland, 2024b).

- The Irish government should prohibit technology companies from partnering with schools on the development of any educational resources unless they have been licensed by the government to do so. For this purpose, a strict set of protocols is required to ensure that children's privacy and data are safeguarded and that they are not exposed via educational technology to advertising, 'persuasive design' or harmful content.

Critical digital literacy

"Digital literacy is the ability to access, explore, manage, understand, integrate, communicate, evaluate, create, and disseminate information safely and appropriately through digital technologies. It includes critical thinking, using ICT safely, responsibly and ethically , collaboration and creativity, finding real information, and respectful online communication" (Government of Ireland, 2024b).

Critical digital literacy equips children and young people to become critically engaged (re) designers of technology (Pangrazio, 2016), as well as enabling them to resist the polarising nature of the digital environment, to disagree respectfully and to develop strategies that enable them to evaluate misinformation and disinformation, and reduce risks of a wide range of harms (Pangrazio, 2016; Ging and Castellini da Silva, 2022; Breslin and O'Connor, 2024; Children's Rights Alliance, 2025b). Periods of transition, "especially during the critical neurological growth spurts of early childhood and adolescence", have been noted as important points of opportunity for educational interventions (United Nations, 2021, p. 3).

Many studies and reports emphasise the importance of ensuring digital literacy not only for children and young people, but also for their caregivers, including parents and teachers, keeping pace with rapidly changing technologies, becoming a core part of education at all levels, so as to prepare children and young people for safe and informed digital participation (United Nations, 2021; OECD, 2024, 2025b; Doyle *et al.*, 2025; Manolios *et al.*, 2025).

Several studies (Doyle *et al.*, 2025; Fox, Robertson and Lunn, 2025) emphasise that parents and carers need help to be able to support children and young people to be healthy in the digital environment, also noting that criticism is often not helpful. Parenting programmes, public campaigns, online guidelines and in-person interventions can all be useful. Evidence suggests that support for parents and carers could include helping them manage how they engage and mediate with their children to improve their children's digital maturity, resilience and safety online, include setting clear rules and boundaries to reduce risks of negative online experiences (Fox, Robertson and Lunn, 2025).

Reducing health inequalities

Drawing on experience from advocacy groups (Children's Rights Alliance, 2025b, 2025c) as well as research evidence, it is clear that health inequalities related to the digital environment are more likely to be reduced by employing a 'whole system' approach to achieving critical digital literacy, with coordinated engagement of parents, schools and digital technology companies (Breslin and O'Connor, 2024; Fox, Robertson and Lunn, 2025; The Psychological Society of Ireland (PSI) Special Interest Group in Perinatal and Infant Mental Health (SIGPIMH), 2025). Initiatives to develop and support critical digital literacy need to be designed in ways that reduce barriers for marginalised populations (including traveller, Roma, disabled, LGBTQI+ children and young people, and those from low-income backgrounds), ensuring accessible resources and support for parents, caregivers and educators to enable broader participation (Children's Rights Alliance, 2025b).

d) Enforcement and accountability

Operational Recommendation Six: The role that recommender systems play in recommending inappropriate or harmful content to children and young people needs to be addressed by platforms and regulators. Platforms need to ensure that there are effective measures in place to adequately mitigate the risks of children being recommended inappropriate or harmful content. Regulators need to supervise and enforce these obligations under the Digital Services Act (DSA), and in particular, the obligation to swiftly remove content that is illegal and/or harmful.[18] The exemption from liability for harmful but legal content on platforms should be reconsidered if the required steps are not taken by platforms to meet the requirements of the DSA and Online Safety and Media Regulation Act (OSMRA). Where existing legal frameworks prove insufficient to protect children and young people from algorithmic harms, additional regulatory measures should be developed.

- This infrastructure must be designed to proactively prevent harm from occurring by default, rather than merely reacting to reported content.[19]

[18, 19] This will require legislative measures, including EU wide legislation to counter CSAM as proposed in the EU Commission CSAM re-cast draft directive and its currently dormant draft Regulation.

Operational Recommendation Seven: Coimisiún na Meán must be adequately resourced through its levy-based funding system to deliver effective enforcement of online safety regulations, ensuring both proactive prevention of breaches and swift, robust responses to violations. To ensure appropriate Oireachtas scrutiny, Coimisiún na Meán should provide in its annual report, a comprehensive assessment of resource adequacy in protecting children and young people's health and well-being online. Any enforcement gaps or shortfalls can be reviewed by the Oireachtas so that the Government is enabled to take appropriate action.

This could include ensuring that Coimisiún na Meán would be empowered to perform oversight by:

- Directly monitoring, auditing and enforcing online safety regulations

- Geo-blocking access to online services and VPNs and until the services concerned can prove they are safe by default and by design

- Enforcement action enabling the conditional disabling of recommender algorithms and/or entire online services if a service provider cannot provide robust assurances through independent audits and transparent data that its recommender systems are safe for minors cooperating with other regulators throughout the EU and with the European Commission

- Implementing robust age verification at a national level cooperating with other regulators throughout the EU and with the European Commission.

Operational Recommendation Eight: The Irish Government should consider strengthening sanctions and accountability measures under the Online Safety and Media Regulation Act to ensure that Board Members and executives of bodies providing digital products and services are held appropriately accountable for certain breaches of online safety regulations affecting children and young people's health, safety and welfare.

This can be done by:

- Amending the OSMR Act 2022[20], following the precedent set by the Data Protection Act 2018[21], to establish personal liability for senior decision-makers at bodies providing digital products and services.

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[20] Online Safety and Media Regulation Act 2022
[21] Data Protection Act 2018

"Digital exceptionalism"

"Digital exceptionalism" was originally designed to stimulate e-commerce by avoiding the obligation to monitor all content, particularly before advanced machine-learning technologies existed. However, this passive legal status is increasingly being questioned due to the growing sophistication, reach and societal importance of online platforms. Contemporary platforms actively curate and direct content through powerful algorithms. These algorithms determine what users see, and influence information flows with "unprecedented control", suggest that the initial concept of neutral "intermediaries" is giving way to a manufactured product where platforms may be more akin to "publishers" (de Streel, Buiten and Peitz, 2018; Presuel and Martinez Sierra, 2019; Legi, Hadfield-Menell and Lipton, 2021).

Platforms are already legally recognised as having publisher-like responsibilities for the purposes of copyright law. For instance, the EU Directive on Copyright in the Digital Single Market created obligations for platforms hosting large amounts of user-uploaded content, requiring them to monitor and control content actively, and to have the capability to do so, a function akin to a publisher, rather than merely being a passive host (Legi, Hadfield-Menell and Lipton, 2021). The Digital Services Act has imposed obligations on platforms to remove illegal content once it is flagged to them as otherwise they lose their exemption from liability, to engage in risk assessment of systemic risks including harm and to be transparent about content moderation (European Union, 2022).

Among the topics that are currently being debated academically and in the media and legal worlds are:

- Online platform treatment of editorial content from those organs recognised as publishers (Papaevangelou, 2023)

- European Court of Human Rights jurisprudence on the liability of online platforms for user-generated content, specifically hate speech (Korpisaari, 2022)

- Duty of care of online media platforms in regulating misinformation in the context of business and human rights (Machado and Aguiar, 2023).

Legally enforceable codes and regulations

International organisations have repeatedly emphasised the need for enforceable regulations to protect online safety. According to OECD,

> *"Establishing codes and standards for digital service providers is crucial for evaluating risks to children and implementing effective protections, particularly as A.I. advancements and the growth of immersive media amplify these risks." (OECD, 2025b, p. 20)*

The United Nations Committee on the Rights of the Child (UNCRC) has argued that states are responsible for providing effective child protection mechanisms online and safeguarding policies, while also respecting children's other rights, in all settings where children access the

digital environment. The protection mechanisms should be integrated within national child protection policies, and,

> *"States parties should ensure that national policies relating to children's rights specifically address the digital environment, and they should implement regulation, industry codes, design standards and action plans accordingly, all of which should be regularly evaluated and updated. Such national policies should be aimed at providing children with the opportunity to benefit from engaging with the digital environment and ensuring their safe access to it" (United Nations, 2021, pp.4 - 5).*

OECD makes clear that governments can establish and enforce regulations and standards that digital service providers must adhere to, as well as 'encouraging' the incorporation of protective measures into the design of digital services and devices. Such measures include,

> *"implementing default privacy settings, content filters to prevent exposure to false information, inappropriate content, and hate speech, and parental controls, as well as reinforcing age assurance systems that are simple for children and their caregivers to understand and use. Additionally, establishing complaint mechanisms that allow children to report and resolve issues, and involving them in safety discussions ensures their needs are adequately addressed" (OECD, 2025b, p. 20).*

In 2024 – 2025, an international review of policy approaches to protecting young people from online harms and promoting safe digital experiences (World Health Organization European Region, 2025c) noted Ireland's actions to impose new obligations on video-sharing platforms to enhance child protection through the Online Safety and Media Regulation Act, 2022 and the subsequent Online Safety Code (Coimisiún na Meán, 2024), proposed actions to restrict smartphone usage by children and young people and the work of the Online Health Taskforce. WHO noted Ireland's attention on specific mental health disorders, such as anxiety, anorexia, bulimia, depression, eating disorders, attention deficit hyperactivity disorder and suicidal tendencies (World Health Organization European Region, 2025a). "Excessive screen use" and algorithms were noted as having been highlighted by Ireland as public health concerns , requiring responses, but WHO also noted that, similar to other countries, Ireland had, to date, prioritised "content moderation" without addressing "platform-driven" risks (World Health Organization European Region, 2025a). This is seen as a failing by researchers and advocates, who argue that EU and Irish regulatory arrangements currently fall short in adequately addressing platform design, with a lack of clear, enforceable standards that leaves platforms with too much discretion and accountability gaps (Baker, Ging and Andreasen, 2024; Children's Rights Alliance, 2025b). WHO has recently observed a shift in policy developments in a few countries, including Ireland[22], that "show a growing concern about addictive platform design and enforcing regulation of industry", demonstrating a "strong focus on platform accountability" (World Health Organization European Region, 2025b, p.6).

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[22] Also France and the United Kingdom.

The "Child Rights by Design" framework has been proposed as offering a proactive, child-centred approach, advocating for the legal enforceability of safety-by-design principles to prevent harm before it occurs, rather than relying on retrospective reporting (Livingstone and Pothong, 2023; Children's Rights Alliance, 2025b). This approach requires redesigning platforms to foster positive online experiences and to incorporate measures like age-appropriate content controls, safety features, and technical adjustments from the outset (OECD, 2025b; World Health Organization European Region, 2025a). Specific measures, such as conditionally disabling recommender systems for children and young people could potentially act as a powerful economic incentive for platforms to invest in safer design (OECD, 2025b).

e) EU and national regulations

Operational Recommendation Nine: The Irish Government should take a leadership role during its Presidency of the Council of the EU from July 2026, with the aim of encouraging collaboration and alignment of policy actions in the digital environment that will promote health and well-being, as well as ensuring safety and protecting children and young people's rights.

The Irish Government could facilitate the continuing consideration and cooperation on online health safety by EU Health Ministers, including by hosting a high level Ministerial event during the Irish Presidency, ensuring meaningful participation of children and young people in these discussions.

Operational Recommendation Ten: The Irish Government should support the development of the EU Digital Fairness Act (DFA). This Act would address problematic online practices not covered by existing EU consumer laws, and will aim to create a healthier and safer digital environment for all consumers, especially children and young people.

Irish Government actions should promote achievement of "Child Rights by Design" standards and could include:

- Working at EU level to lead the enactment of the DFA as a standalone EU regulation, functioning as a "digital twin" of the Unfair Commercial Practices Directive (UCPD), so as to ensure a horizontal structure for consistent and direct applicability across all Member States, reducing fragmentation.

- Integrating a general prohibition on unfair digital commercial practices, anchored in the concept of "digital professional diligence", moving beyond mere intent to target embedded architectural and algorithmic manipulation.

- Ensuring the expansion of existing consumer law, establishing a clear blacklist of prohibited digital practices, in line with children and young people's rights in the digital environment.

- Mandating transparent consent processes and ensuring children and young people's data is protected, and explicitly prohibiting targeted advertising to minors based on sensitive data.[23]

- Clarifying the complementary application of EU consumer law with other digital legislation, avoiding inconsistent interpretations and ensuring comprehensive protection, especially for children and young people's rights.

International and cross-sectoral cooperation

International bodies are united in calling for better international and cross-sectoral cooperation to ensure the digital environment is healthy and safe for children and young people. UNCRC (2021) notes that the cross-border and transnational nature of the digital environment necessitates strong international and regional cooperation, to ensure that all stakeholders, including States, businesses and other actors, effectively respect, protect and fulfil children and young people's rights in relation to the digital environment:

> *"States parties should promote and contribute to the international and regional exchange of expertise and good practices and establish and promote capacity-building, resources, standards, regulations and protections across national borders that enable the realization of children's rights in the digital environment by all States. They should encourage the formulation of a common definition of what constitutes a crime in the digital environment, mutual legal assistance and the joint collection and sharing of evidence"* (United Nations, 2021, p. 20) .

The European Commission has also noted the need for international action, producing new draft guidelines to support providers of online platforms "to ensure a high level of privacy, safety and security on their platforms" (European Commission, 2025a). Measures are proposed to enable close collaboration by all key stakeholders to build a safer digital environment, particularly the digital industry but also policymakers, local authorities, youth workers, educators and family members. Other proposed measures by the European Commission support awareness-raising among parents, caregivers and educators, media and digital literacy campaigns among children and young people, better design of digital products to promote safety and privacy and enhanced reporting mechanisms to help combat online sexual exploitation, inappropriate behaviour or harmful content (European Commission, 2025a).

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[23] Sensitive data refers to special categories of personal data defined under Article 9 of the GDPR, which require extra protection due to their potential impact on individuals' rights and freedoms. This includes information such as racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data for identification, health data, and data concerning a person's sex life or sexual orientation.

As well as international collaboration, within countries cross-sectoral "whole of government" policy frameworks have been proposed by OECD as, "essential for addressing the complex challenges of the digital environment for children" (OECD, 2025b, p. 20). Coimisiún na Meán works with regulators across all EU Member States as part of Digital Services Board and with the European Commission and is a member of the Global Online Safety Regulators network. It is vital that this close cooperation continues as the internet has no borders. Working with international counterparts helps to set global norms for online safety, minimising the possibility for bad actors to evade regulation.

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Acknowledgements

Appendices

Appendix A: Taskforce Members

Jillian van Turnhout: Chair

Noeline Blackwell: Children's Rights Alliance

Eoghan Cleary: Assistant Principal, Temple Carrig Secondary School, Greystones

Dr Abigail Collins: Consultant in Public Health Medicine and the National Clinical Lead for Child Health Public Health, HSE

Alex Cooney: Chief Executive Officer, CyberSafeKids

Professor Philip Dodd: Deputy Chief Medical Officer, Mental Health Policy Specialist, Department of Health

Brianna Faughnan: National Youth Assembly of Ireland

Professor Debbie Ging: Professor of Digital Media, Dublin City University

Rachel Harper: Principal, St Patrick's National School, Greystones

Professor Mary Horgan: Interim Chief Medical Officer, Department of Health

Donnacha Lenehan: National Youth Assembly of Ireland

Professor Peter Lunn: Research Professor, Head of the ESRI's Behavioural Research Unit

Dr Brian Mac Namee: Associate Professor, School of Computer Science, University College Dublin

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Niamh Hodnett: Online Safety Commissioner, Coimisiún na Meán attended meetings in an observer capacity.

Appendix B: Taskforce Terms of Reference

Terms of Reference

1. **Detail the range of social, mental health, physical health and sexual health harms being caused to young people by certain types of online behaviours and content.** Inputs can include (but do not need to be limited to):

   a. International and national literature review, including work being successfully done in other countries;

   b. Expert input (e.g., clinicians, researchers, educators);

   c. Testimony from young people, parents, health and social care workers, community workers and others as appropriate;

   d. This phase should not include lengthy primary research, but rather be a compilation of existing research, expert input and testimony from different stakeholders.

2. **Ensure a comprehensive approach in identifying these harms, including:**

   a. Social (e.g., bullying, effects on social interaction);

   b. Physical (e.g., physical activity, sleep deprivation);

   c. Mental and emotional (e.g., self-harm, suicide ideation, eating disorders, attention, self-regulation, digital addiction, self-concept);

   d. Sexual (e.g., sexual violence, sexual development, exposure of children to pornography and sexually explicit content);

   e. Societal (e.g., violence against women, male supremacy, racism, extremism).

3. **Detail the range of sources of these harms. For example:**

   a. Devices (regardless of apps / content): Smart phones, tablets, laptops;

   b. Online content: E.g., Promotion of self-harm / suicide / eating disorders; Pornography; Age-inappropriate suggestions, AI-generated content (e.g., on YouTube Kids); Male supremacy; Negative stereotyping based on protected characteristics (e.g., gender, race/ethnicity, religion); Violence against women; Racism and xenophobia.

   c. Social media: E.g., Impact of algorithms; AI chat-bots; Design features (E.g., Addictive features, digital nudges, social interaction design).

4. **Provide a voice to those impacted,** including young people and parents.

5. **Identify gaps in protecting young people from potential harms. For example:**

    a. Level of awareness in relevant groups of harms being caused.

    b. Availability of effective, affordable and easy-to-use technical tools available to parents / guardians including screen time and age-appropriate filters.

    c. Level of responsiveness of social media and video sharing companies to harms being caused;

    d. Level of accountability of social media and video sharing companies for the harms they are causing and/or facilitating;

    e. Level of content filtering being offered to households in Ireland by Internet Service ~ Providers;

    f. Existing educational supports and media literacy programmes for children/young adults to help protect their development, mental health and well-being.

    g. Whether 13 is an appropriate age for children to have access to social media.

    h. The inadequacy of existing age verification tools.

6. **Recommend responses to address these harms,** including, but not limited to:

    a. National guidelines and guidance for relevant groups;

    b. Further regulation / legislation;

    c. International collaborations;

    d. Awareness measures (e.g., public campaigns, labelling);

    e. Education (for young people, parents, educators, clinicians and others);

    f. Technical solutions;

    g. Additional health and social care support; Further research.

Appendix C: Secretariat for Taskforce

Eddie O'Reilly, Principal Officer, Public Health Policy Unit

Brian Callaghan, Assistant Principal Officer, Public Health Policy Unit (to August 2025)

Peter Holohan, Higher Executive Officer, Public Health Policy Unit

James Monagle, Executive Officer, Public Health Policy Unit