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Dear Carolyn Thomas MS, Chair of the Senedd Petitions Committee,

**RE: P-06-1482 Ban smartphones in all schools in Wales with exemptions for exceptional circumstances – Supplementary Information on the NSPCC’s Position on Children’s Access to Smartphones and Social Media**

Thank you for inviting NSPCC Cymru to participate in the roundtable on 6<sup>th</sup> January 2025 which gathered views on P-06-1482 Ban smartphones in all schools in Wales with exemptions for exceptional circumstances currently under consideration by the Senedd Petition’s Committee. Following the invitation at that meeting to share further information and insights, we are pleased to provide some additional detail on the NSPCC’s position on children’s access to smartphones and social media.

We would like to start by acknowledging the significant public and political debate and concern about children and young people’s wellbeing and access to the online world. Recent discussions, including the petition currently before the Committee reflect on whether children should be able to use smartphones and social media at all because of concerns about the impact on their safety and mental health; and if children should use them, the appropriate age of access has been another key focus for debate.

The NSPCC is committed to ensuring that children can enjoy the benefits of the online world in a safe and healthy way. We urge policymakers to take a balanced approach to children’s access to the online world – one which draws on available research evidence and ensures tech companies take responsibility for children’s safety and wellbeing on their services. This should avoid unnecessarily blunt tools that would punish young people for the failure of platforms to embed safety by design.

In the context of the petition currently before the Committee, we believe the core building blocks required to achieve such as a balanced approach in schools are:

- **Supporting schools to deliver policies that work best for their pupils.** This could include the provision of evidence-based guidance to schools to support decisions and policies on restrictions on phones in learning environments. This should support a consistent approach that considers the needs of all learners. Any guidance should take a holistic and rights-based view of children’s wellbeing needs informed by equity and diversity considerations. Coherence with other policies and procedures concerning children and young people including safeguarding, is also crucial. Any policies around restrictions in schools must also be carefully considered and delivered in a way that does not damage the crucial link between school and children’s safeguarding. Children must be supported to understand school as a safe space to share and disclose harm and abuse.

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- **Provide funding, resources and support to help schools enforce such policies.** This could include funding for purchasing phone lockers, pouches or providing school-based access to devices other than phones to all children to support learning.
- **Continue to press for effective regulation and safety by design by tech companies.** This should include appropriate policies on and the enforcement of age assurance by regulated services and for platforms to implement safety by design to ensure age-appropriate experiences online and to mitigate the risk of harm to children.

### **Considerations on the issue of a wider smartphone ban for children and young people: building and sharing a balanced, evidence-based understanding of children's use of the online world**

The online world is an integral part of children's lives. Children and young people learn, play, and socialise online – they are clear that they enjoy many benefits from social media, messaging apps, gaming services and access to the wider online world. Many children do not distinguish between their 'online' and 'offline' worlds, with both parts informing who they are and their life experiences.

Ofcom recently shared research showing that around 7 in 10 children who use social media or messaging sites say these apps make them feel happy and closer to their friends.<sup>1</sup> Children consistently emphasise the importance of the online world to their lives. The [NSPCC's Voice of Online Youth \(VoOY\)](#) cites key benefits including relaxing and connecting with friends, being involved in projects and social action, and finding new interests and ideas. When discussing proposals to limit children's access to smartphones, the VoOY emphasised the importance of ensuring children have positive, safe online experiences and emphasised that removing access is a blunt tool that ignores the benefits and punishes children.

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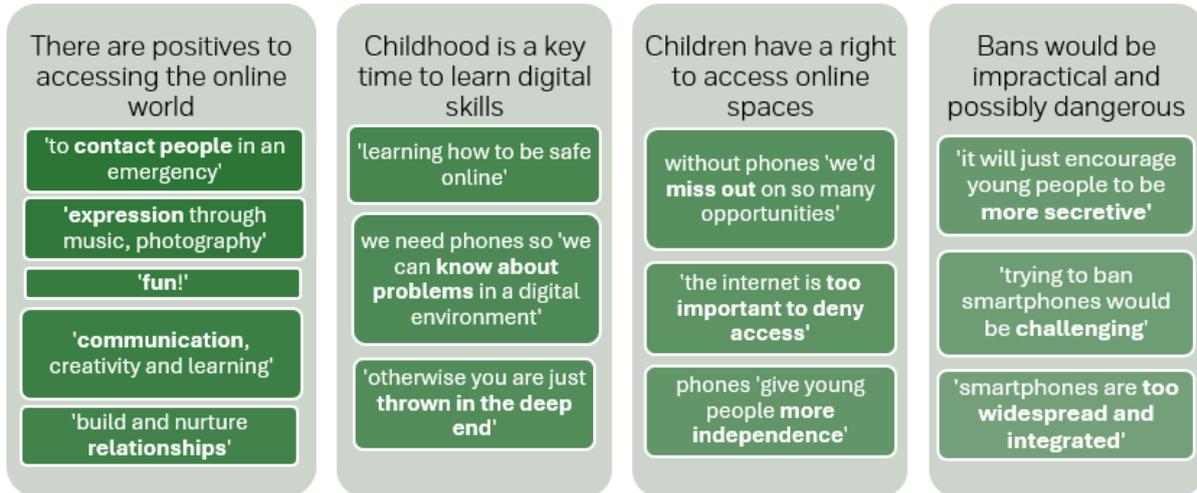
<sup>1</sup> This research relates to 8-17-year-olds, who said they felt this most or all of the time. Ofcom (2024) Children and Parents: Media Use and Attitudes Report. Available at: [Children and parents: media use and attitudes report 2024 - Ofcom](#)

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**Figure 1: Voice of Online Youth's reasons for supporting under 16s access to smartphones**



Access to the online world is particularly important for some groups of children and young people. For example, for LGBTQ+ children, online spaces and online allies are an important part of their support network and help them to feel part of a community.<sup>2</sup> Neurodiverse children and young people benefit from using the internet to support learning and interacting with their peers.<sup>3</sup> Limiting access to these spaces for children risks further marginalising already vulnerable groups.

Under the UN Convention on the Rights of the Child, children and young people have fundamental rights which should be reflected in their lives – whether on or offline – including the rights to access information, to express themselves and their views, to have their privacy respected (as well as to be protected from harm so they are safe). The UN Committee on the Rights of the Child has been clear that states (including the UK) must ensure “*all children have equal and effective access to the digital environment in ways that are meaningful for them*” and notes the risk that “*children may be discriminated against by their being excluded from using digital technologies*”.<sup>4</sup>

<sup>2</sup> Berger, M. et al. “Social Media Use and Health and Well-Being of Lesbian, Gay, Bisexual, Transgender, and Queer Youth: Systematic Review.” *Journal of Medical Internet Research* 24, no. 9 (September 21, 2022): e38449. <https://doi.org/10.2196/38449>.

<sup>3</sup> Cerebra (2015) [Learning Disabilities, Autism and Internet Safety: A Guide for Parents](#). The Society has partnered with NCB to understand the online experiences of neurodivergent children and young people.

<sup>4</sup> UN Committee on the Rights of the Child (2021) [General comment No. 25 \(2021\) on children’s rights in relation to the digital environment](#). Contains 11 Principles for a child-rights approach

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The online world can also offer vital access to confidential advice and support. Almost three quarters of Childline’s counselling sessions take place through online messaging and emails. This approach allows children to feel more comfortable discussing their problems and disclosing harms. Using personal devices, like smartphones, can help children and young people to feel more comfortable discussing problems and disclosing harm.

**As well as benefits, the online world also carries risks to children’s safety.**

The scale of risk and harm that children continue to face online is unacceptable. Many tech companies have rolled out apps and features without children’s safety in mind, meaning children continue to be at risk of sexual abuse and exploitation, and have dangerous and inappropriate material pushed to them through algorithms on a daily basis. There has been some research that explores on the risks and benefits of social media and smartphones to children’s mental health and the impacts of excessive use, but evidence remains inconclusive. Moreover, based on available evidence, the clearest risks to children’s mental health linked to social media and smartphones appear to stem from the types of content they see and from dangerous interactions. The implementation of the UK Online Safety Act will play a significant role in addressing these types of harm, as services will be required to ensure that children cannot access harmful material, including through algorithms and appropriate age assurance mechanisms. There is also significant scope for other risks posed by online services to be addressed through better regulation – such as tackling harmful design features like ‘endless scrolling’.

Considerations for bans are thus highly complex and must draw on and carefully consider existing evidence while simultaneously listening to children. As set out in Figure 1, the NSPCC’s Voice of Online Youth raised concerns that restrictions risk creating a more secretive culture around phone and social media use, that might mean more problems go unaddressed. A balanced view thus needs to carefully breakdown and consider:

- What exactly is putting children at risk and how? This must take a holistic rights-based view of children’s wellbeing;
- How social media and smartphones can be designed with their safety in mind and how can we regulate and enforce that regulation to ensure this is delivered?
- What practical steps can be taken by families and schools and what support do they need?
- What do children want and need from solutions to keep them safe?

The NSPCC is concerned that bans represent a blunt tool that could result in an array of unintended consequences including:

- Engendering secrecy and intensifying risk;
- Driving children and young people to less secure, unregulated or less regulated spaces which may expose them to even greater risks and harms;

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- Limiting access to educational resources and opportunities for shared learning, growth, creativity and exposure to new information and ideas;
- Disempowering young people and hindering their ability to develop crucial technological and digital literacy skills;
- Making children wary of or avoid reporting abuse online for fear of being in trouble.

We must not punish young people for the failures of tech companies to properly embed child safety into the services they design. Our concern is that placing an emphasis on bans risks diluting focus, letting tech companies off the hook and undermining steps towards greater regulation and safety by design. For more information on our key positions on the delivery and enforcement of robust regulation and additional measures required for safety by design please see details in our response to Ofcom's Protecting Children from Harms Online Consultation.<sup>5</sup>

I look forward to hearing the outcome and receiving the report and recommendations of the Senedd Petition Committee's consideration of [P-06-1482 Ban smartphones in all schools in Wales with exemptions for exceptional circumstances](#) on 20<sup>th</sup> January. Should the Committee require any further information or clarification, please do not hesitate to contact me.

Yours sincerely



**Cecile Gwilym**  
Policy and Public Affairs Manager

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<sup>5</sup> Available at: [ofcom\\_protecting\\_children\\_consultation\\_NSPCC\\_exec\\_summary](#)

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