



21 June 2024

Dear Dame Melanie,

We are dismayed by Ofcom's decision that it is disproportionate to require social media companies to 'effectively' uphold their own age limits, and write to you with this urgent plea. Upholding social media age limits is critical for the protection and safety of children and families in our nursery, primary, special and secondary schools.

Since the mid-2000s Headteachers in our network have been managing serious online safeguarding cases with an unprecedented increase since 2010 when smartphones and social media 13+ 16+ use by children, became an accepted norm in society, including a large % primary age children and even nursery age. This is despite extensive education and policy across our region of schools, inc. partnerships with national and global safeguarding and education charities.

Schools have no means of enforcing the age ratings on social media and gaming platforms. And we as a community are at a loss as to how to safeguard pupils if Ofcom is going to let us down again. Children are accessing unsafe, explicit, and illegal material, at scale, and the addictive nature of the products makes it harder to teach and impossible to safeguard.

We are increasingly requiring police involvement in our schools, often for children under the age of 13+ who should not even be on the services that are harming them.

For example:

- extreme, harmful and illegal content easily accessible on mainstream 13+ social media inc. pornography, misogyny, violence and knife crime, fake news, racism, self-harm, challenges, suicide, radicalisation and extremism. Not all of which will be caught by the proposed 18+ measures and yet are extremely disturbing and unsuitable for primary and nursery school children.
- Children under the age of 13 struggle to self-regulate on highly addictive apps, which nudge children to share photos, videos and location.
- Older children, peer to peer and strangers posing as children or young adults are accessing very young children. Ofcom should not be allowing companies to access nursery, primary and underage children, to do so puts them at risk.
- Excessive time spent on social media is displacing other critical child-development activity in offline world, as well the positive opportunities of "good screentime and tech. By failing to require companies to effectively uphold their own age limits, Ofcom is failing children that we see struggling every day.

Our headteacher network provided evidence of these cases in the run-up to the Online harms bill and held great hope that the new Ofcom regulatory frameworks for online platforms would become as robust as those frameworks protecting children from harm with fireworks, fairground rides, seatbelt-less cars, smoking and so forth, providing schools and social care services a framework to help protect children in a 21 century. We are devastated that it is not the case.



We welcome the 18+ age checking that has been announced, but are dismayed that Ofcom's draft Children's code, fails to enforce effective minimum age limits on social media? WHY? The situation is untenable, and we urge Ofcom review this draft code, to require social media and gaming companies to uphold age limits in an authoritative and robust manner.

Once the code is fit for purpose, we also ask that Ofcom uses its media literacy duties to translate the code into a national health and safety campaign that mirrors previous hard hitting campaigns which have been successful.

Islington headteacher Network

<http://www.islingtonheadteachers.org>

55 nursery, primary, secondary and special schools