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# Regulation of Online Platforms and Supports to Improve Online Safety and Participation

**Submission to the Joint Committee on Arts, Media, Communications, Culture and Sport**



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## 1. Introduction

The Ombudsman for Children's Office (OCO) is an independent statutory body, which was established in 2004 under the Ombudsman for Children Act 2002, as amended (2002 Act). One of the OCO's core statutory functions under the 2002 Act is to promote the rights and welfare of children up to the age of 18 years.

The OCO welcomes the invitation from the Joint Committee on Arts, Media, Communications, Culture and Sport to submit written evidence on the topic of 'Regulation of online platforms and supports to improve online safety and participation'. We note that the Committee wishes to explore issues relating to the regulation of online platforms, supports to improve online safety, the surge of disinformation, misinformation and mal-information, media literacy, digital inclusion, and the targeting of inappropriate advertising towards vulnerable people.

In preparing this submission, the OCO has been mindful of the wide-ranging experience and expertise of the many stakeholders who may contribute to this consultation. Correspondingly, the purpose of our submission is to highlight a number of issues, which we believe should be considered in the context of the Committee's work to ensure that the rights of children and young people are more fully protected in this area.

This submission is made in collaboration with the OCO Youth Advisory Panel (YAP). We thank the committee for the opportunity for members of our YAP to input to the Committee on this subject. Young people we engage with routinely offer considered, rights-based solutions to problems, grounded in their lived experience. The value of listening to children and taking their views seriously on issues that affect their lives is not to be underestimated. In light of children's right to express their views in all matters affecting them and to have due weight given to their views in accordance with their age and maturity, the OCO encourages the Joint Committee to continue to support children and young people to contribute their views to future work in this area.

## 2. Children's Rights in the Digital Environment

There are a wide range of children's rights that are engaged in the online environment. The internet is an important resource for children and young people's education and learning; it facilitates them to access and share information; it supports them to maintain contact with family; it provides opportunities for play, recreation and engagement with cultural life and the arts; it affords access to health information and support services; and it is a means through which they express their views and participate in decisions affecting them.

However, the internet can present challenges with regard to safeguarding children and young people's privacy and expose them to risks such as online fraud, violence and hate speech, cyberbullying, grooming for sexual exploitation, trafficking and child pornography, and targeting by criminal or extremist groups.

In 2021, the OCO published research carried out by Technological University Dublin focused on [progressing children's right to be heard through social and digital media](#).<sup>1</sup> The research included a consultation with children and young people whereby;

- Children expressed how they enjoy a wide range of benefits through social and digital media and especially appreciate its “Communication” and “Information” functions.
- All children are particularly cognisant of the barriers and challenges in the digital environment. Cyberbullying and unwanted communications are identified as particular challenges and inhibitors to their ability to avail of more opportunities online.
- Children enjoy the functionality of being connected through digital technologies and extending their horizons for communication and learning.
- Children want to see a range of improvements to their digital experience, with more attention given to safety, respect for privacy, higher quality information, training and supports.
- Government leadership in this area is welcomed but more can be done to fulfil children's rights.

## International Children's Rights Standards

Through ratifying the **UN Convention on the Rights of the Child (UNCRC)** in 1992, Ireland has an obligation under international law to respect, protect and fulfil the rights of all children living in Ireland. Recognition that children's rights apply in the digital environment has been highlighted by the **UN Committee on the Rights of the Child in General Comment 25** which identifies the digital environment as an important dimension in which children's rights should be promoted and realised. It requires State parties to ensure that national policies relating to children's rights specifically address the digital environment, noting that “the use of digital technologies can help to realize children's participation at the local, national and international levels”. It confirms children's rights apply in the digital environment as they do in the offline world and clearly stipulates the rights of every child to privacy, non-discrimination, protection, education and play.

These rights include four general principles, which are integral to the realisation of all children's rights under the UNCRC:

- Article 2 provides that all children must be able to enjoy their rights without discrimination of any kind, irrespective of their circumstances or those of their parents/guardians. In relation to the digital environment, the State must take measures to prevent digital exclusion, hateful communications or unfair treatment through use of those technologies.<sup>2</sup>

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<sup>1</sup> Technological University Dublin (2021), [Digital Voices: Progressing Children's Right to be Heard through Social and Digital Media](#).

<sup>2</sup> UN Committee on the Rights of the Child (2021), [General Comment No. 25: on children's rights in relation to the digital environment, CRC/C/GC/25](#), para. 14.

- Article 3 requires children's best interests be treated as a primary consideration in all actions concerning them. In this regard, States should ensure that, in all actions regarding the provision, regulation, design, management and use of the digital environment, the best interests of every child is a primary consideration.
- Article 6 recognises children's right to life, survival and development. In this regard, States are expected to interpret 'development' as a holistic concept encompassing all aspects of children's development and are obliged to provide optimal conditions for childhood.<sup>3</sup> Opportunities provided by the digital environment play an increasingly crucial role in children's development.<sup>4</sup> This principle requires States to identify and address risks that children face in different contexts.
- Article 12 provides for children's right to express their views freely in all matters affecting them and for due weight to be given to children's views, in accordance with their age and maturity. States use the digital environment to consult with children and should ensure that digital service providers actively engage with children, applying appropriate safeguards, and give their views due consideration when developing products and services.<sup>5</sup>

Child Rights Impact Assessment (CRIA) is identified by the Committee as a key measure to implement children's rights and involves examination of the potential impacts of laws, policies, decisions or services on children and their rights. They also help in the identification of ways to prevent or mitigate any negative impacts.<sup>6</sup> At a minimum, the UNCRC, including its general principles, should be used as a framework for conducting CRIA and CRIA should have special regard for any differentiated impact of measures to be taken on children.<sup>7</sup>

It is notable that, following its review of Ireland's combined fifth and sixth reports on the implementation of the CRC, the Committee recommended in 2023 that the State introduce mandatory requirements for the business sector to undertake assessments of, consultations on and full public disclosure of the children's rights impacts of their business activities and their plans to address such impacts.<sup>8</sup> This applies to the practices and products of technology and social media companies.

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<sup>3</sup> UN Committee on the Rights of the Child (2003) [General Comment No.5: General measures of implementation of the Convention on the Rights of the Child](#) CRC/CGC/2003/5, p.4.

<sup>4</sup> UN Committee on the Rights of the Child (2021), [General Comment No. 25: on children's rights in relation to the digital environment, CRC/C/GC/25](#), para. 14.

<sup>5</sup> Ibid.

<sup>6</sup> UN Committee on the Rights of the Child (2013), [General Comment No. 14: on the right of the child to have his or her best interests taken as a primary consideration \(art. 3, para. 1\)](#), CRC/C/GC/14, para. 99.

<sup>7</sup> see also: Council of Europe (2020), [Handbook for policy makers on the rights of the child in the digital environment to support the implementation of Recommendation CM/Rec\(2018\)7 of the Committee of Ministers of the Council of Europe on Guidelines to respect, protect and fulfil the rights of the child in the digital environment](#); Digital Futures Commission (2021), [Child Rights Impact Assessment: A tool to realise children's rights in the digital environment](#).

<sup>8</sup> UN Committee on the Rights of the Child (2023), [Concluding Observations on the combined Fifth and Sixth periodic reports of Ireland, CRC/C/IRL/CO/5-6](#), para. 13(b).

## Taking a Children's Rights Approach to Online Safety and Participation

A child rights approach treats children as rights holders rather than as objects that need assistance. It is an approach that respects all rights set out in the UNCRC, including the right to protection from harm as well as privacy, freedom of expression, access to information, education and play. A child rights approach would develop the capacity of policymakers, regulators and companies as duty bearers to meet their obligations towards children. It is guided by the four general principles of the UNCRC and respects children's evolving capacities in the exercise of their rights.

A child rights approach also includes the general measures of implementation, identified by the UN Committee on the Rights of the Child, to help governments more effectively operationalise the UNCRC, this would include:

- Legislation that is compliant with the CRC and that enables business enterprises to develop child-centred online service
- Effective child-sensitive procedures for redress for online-related harms
- Online safety policy rooted in the CRC
- Coordination of initiatives on children and online safety across government
- Independent monitoring of actions taken by public and private organisations and appropriate redress mechanisms
- Child rights impact assessments of legislation, policy and the system development lifecycle including child rights by design
- Data collection on the impact of the online world on children
- Training and capacity-building on children's rights and a child rights-based approach for government officials, parliamentarians, regulatory and companies

## 3. Key Issues and recommendations

### Regulation of Online Platforms and Supports for Online Safety and Participation

The OCO have made a number of submissions to the Department of Communications and Coimisiún na Meán online safety, primarily in response to the development of Ireland's first online safety code.<sup>9</sup> The OCO promotes the adoption of rights-based regulation and guidance for online service providers to ensure that they are enabled to fully respect

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<sup>9</sup> See: Ombudsman for Children's Office (2024), [Observations on Coimisiún na Meán's Draft Online Safety Code and Statutory Guidance Material](#) ; Ombudsman for Children's Office (2023), [Submission to Coimisiún na Meán Call for Inputs on an Online Safety Code for Video-Sharing and Platform Services](#) ; Ombudsman for Children's Office (2019), [Submission to the Department of Communications, Climate Action and Environment Public Consultation on the Regulation of Harmful Content on Online Platforms and the Implementation of the Revised Audiovisual Media Services Directive](#) .

children's rights. This involves giving careful attention to international and European guidance and recommendations concerning the interrelated areas of children's rights online and children's rights and business, including guidance and recommendations relating to legislative, regulatory and remedial measures. Importantly, it involves providing children and young people under 18 with a meaningful, timely, age-appropriate and child-friendly opportunity to express their views in relation to those aspects.

Through the establishment of Coimisiún na Meán and the enhancement of online safety measures through legislation and regulations, Ireland has made strides in online safety in recent years. However, we are concerned that the current framework does not provide us with a clear and predictable legal and regulatory environment that enables business enterprises to respect children's rights, in line with children's rights standards and guidance. We need a detailed framework that engages with children's rights and welfare and that outlines exactly how providers can align its practices with children's rights standards and guidance in this area. The online safety code requires platforms to achieve certain objectives (i.e. in relation to parental controls and age verification) but still gives considerable discretion and choice to companies on how they implement the requirements. This level of discretion also makes monitoring and enforcement more challenging. Such an approach does not guarantee children have the highest level of privacy, safety and security online.

In our latest school survey, 73% of young people agree that Government and social media companies need to be more proactive about managing risk to young people.<sup>10</sup>

## Perspectives of the OCO YAP

During a series of consultations held with members of our Youth Advisory Panel (YAP) in January 2026, they expressed concerns about the lack of systems in place to protect children on online platforms. They referenced inappropriate and unsafe interactions between adults and children on gaming platforms designed for children such as Roblox, with one member suggesting that platforms tend to prioritise profits over effective safeguards. They expressed a need for more education about staying safe online, as well as more parental supervision and controls, but some also felt that it is hard for young people to engage safely online in the absence of systemic safeguards. Concerns were expressed about AI, with one member commenting, "it generates a lot of bad stuff and can be really awful for children".

Algorithms were clearly identified as a source of harmful material. Young people highlighted the promotion of extremist political views, self-harm and unrealistic body image via algorithms; including targeted advertising (such as skincare for small children, "skinny teas", gambling sites on games and promotion of hyper-materialism), as well as dangerous body modification procedures, such as 'bonesmashing', 'looksmaxxing'<sup>11</sup> and promotion of

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<sup>10</sup>Ombudsman for Children's Office (2025), [Extremism, Discrimination and Gender Roles](#), p. 25.

<sup>11</sup> "Bonesmashing" and "lookmaxxing" refer to recent and dangerous social media trend whereby individuals deliberately hit their facial bones with blunt objects (like hammers or bottles) in a misguided attempt to fracture and "remodel" them for a more chiselled, defined appearance.



disordered eating. The YAP also suggested that negative comments posted on videos about people's appearance and physique reinforced this kind of harmful messaging but were difficult to report. One male member of the YAP also referenced the harmful impact of teenage boys being exposed to misogynistic content related to Incel subculture. Excessive screen time and the addictive nature of the online world were also identified as concerns. When discussing safeguards, YAP members queried the effectiveness of existing age verification procedures and expressed privacy concerns about sharing their personal information, such as photo ID, with online platforms to support age verification. In addition, they felt that existing age-verification mechanisms were too easy to bypass; "people have used the Sims to bypass it".

The use of AI itself by online platforms to moderate reporting was viewed as ineffective and young people shared experiences of finding it difficult to report clear violations, such as the sale of drugs on social media platforms. Our YAP members were split on the question of introducing social media bans for young people, with one member describing it as censorship, another suggesting that young people would inevitably find ways of circumventing any ban, and others highlighting that it may impact upon young people's ability to stay in touch with friends and relatives living abroad. However, there was firm consensus among the group around restricting the access of younger children to social media, particularly those aged under 14.

## Recommendations

- 1. Fully and directly incorporate the UNCRC into domestic law, to create the culture change and legal landscape needed to ensure children's rights are fully respected, protected and fulfilled both online and offline.*
- 2. Implement the recommendations of the [Online Safety Taskforce](#) recognising online social media as a public health issue with responses that require respect for children's rights in the digital environment. In particular, we strongly support the adoption a "Child Rights by Design" approach to online safety which will ensure children's rights, safety and wellbeing are built into digital products and services from the outset, not as an afterthought.*
- 3. Create new structures and enhance existing structures in Government and regulatory bodies to ensure the participation of children and young people in decision making.*
- 4. Put in place a child-friendly complaints handling procedures, which is not chatbot based, with Coimisiún na Meán providing supplementary guidance on*



*how online service providers can ensure their processes are child-friendly and take into account children's rights.*

- 5. Implement age assurance measures and parental controls in a way the protects children's rights, including their right to privacy and the protection of their personal data.*
- 6. Put in place safeguards to prevent adults from accessing sites that are meant for children.*
- 7. Ensure that gaming sites like Roblox are covered under laws and regulations.*

## Disinformation and Misinformation

In December, the OCO published a new school survey on *Emerging Social Issues in Modern Ireland* which shines a light for the first time on the impact on children of a rise in extremism, discrimination and shifting attitudes toward gender roles.<sup>12</sup> 626 students in 28 secondary schools across the country took part in the online survey, which revealed that 63% of young people come across extremist views online, compared to just 6% in real life.

The OCO undertook this survey following reports, through our work, that children were encountering what they felt was extremism, in their everyday lives. This survey shows that discussions about extremism in wider society are permeating through to our young people. It also shows that some key issues such as immigration and gender norms are coming up for young people and having an impact on them. 84% say they hear negative comments about immigration or housing. 61% of students say they often hear comments that society should revert to 'traditional' gender roles and 51% have heard views that men are more entitled to authority than women.

Young people are highly aware of the rate of mis- and dis-information, as evidenced in the survey with quotes such as:<sup>13</sup>

- "Many people are getting information off TikTok and are just thinking its fact when most of it is some random crap someone made up."
- "The government should be doing more to combat the spread of disinformation."
- "People need to become more educated on these matters to prevent misinformation that can be harmful."

Our survey also revealed a clear gender divide in the issue of extremism amongst young people, with 64% of students associating views they would consider extreme with men and boys.<sup>14</sup> This is further reflected in research by the European Movement Ireland, which found

<sup>12</sup> Ombudsman for Children's Office (2025), [Extremism, Discrimination and Gender Roles](#).

<sup>13</sup> Ombudsman for Children's Office (2025), [Extremism, Discrimination and Gender Roles](#), pp. 9, 27, 28.

<sup>14</sup> Ombudsman for Children's Office (2025), [Extremism, Discrimination and Gender Roles](#), p. 2.

that men and boys were more often the target of misinformation and extremist rhetoric by modern far-right groups in Ireland.<sup>15</sup>

In the YAP report *AI and Us*, they highlighted how there's no doubt that AI makes it much easier for young people to access information independently. However, they are well aware that the information AI gives us can often be unreliable, inaccurate, or biased. They stated that this was "all the more reason to continue to develop young people's ability to think critically and to question sources".

### Perspectives of the OCO YAP

The findings of our school survey were reinforced during a consultation with members of our Youth Advisory Panel in January 2026. They described first-hand experiences of hearing extremist views from young children who had encountered racist content online. The vulnerability of this cohort to disinformation and misinformation due to their age and impressionability was emphasized. The YAP also spoke about extreme content to which they themselves had been exposed. They found it confusing and anxiety-inducing and were concerned about how difficult it is to develop one's own views. YAP members identified the potential for children to experience serious and sometime fatal harm because of false medical information or dangerous trends circulating online.

Fake advertising and the impact of influencers were also highlighted as areas of concern, in terms of the content and views influencers can promote and the, often false, "perfect life" they sell to young people. YAP members underscored the importance of fact-checking, whilst flagging that this can be a difficult exercise, especially in relation to misinformation that is spread at local level. They explained that, in this case, it is harder for young people to verify potentially inaccurate information they have encountered online as such stories may not be covered by more reputable and well-established media outlets. They would like to see more education around this issue in schools to equip them with the expertise to identify misinformation. The YAP also expressed frustration that guidelines on TikTok aren't implemented as they should be, and it was very rare to see videos containing misinformation or disinformation get flagged or taken down.

### Recommendations

- 1. Recognise disinformation/misinformation as a children's rights issue.***
- 2. Develop a resource, which is part of the school curriculum, that would equip children with critical reading and thinking skills to determine the veracity of information. This resource could also signpost websites where children and young people can access reliable and accurate information about current affairs, topical issues and news stories.***

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<sup>15</sup>European Movement Ireland (2025), [The Disinformation Landscape: Youth in Ireland and the EU](#).

- 3. Turn off algorithms by default: The government and Coimisiún na Meán must adopt the highest standards when implementing the Digital Services Act, EU AI Act and GDPR obligations relating to recommender systems and children. Such provisions should, at a minimum, prohibit recommender systems based on profiling of children and require service providers to turn off recommender algorithms by default for all children.**
- 4. Require social media companies to verify information before it is posted, particularly in the realm of health-related information.**

## AI

Children are the group most likely to be impacted by AI but, right now, policies and laws have little or no focus on young people and our rights. In September 2025, the OCO published two reports on AI and Children's Rights. The first, [A Policy Spotlight on AI](#), conducted a review of policy and research on the issue of AI and children's rights.<sup>16</sup> At a national level in Ireland, children and their rights are almost entirely absent from current Government policies, law and governance structures, with very little attention explicitly given to safeguarding the rights of children. Ireland's National Strategy on AI focuses on economic competitiveness and does not reflect a unified, government-wide approach. Children are referenced on only two occasions in the National Strategy on AI: once in relation to teaching children the skills to engage with AI and the second in connection with opening a conversation with children about AI. There are no structures that allow regular, meaningful opportunities for children to participate in AI processes and governance. Clear and consistent guidance is needed on child rights-centred actions that can be taken across law, policy and practice.

### Perspectives of the OCO YAP

In our second report on AI, [AI and Us](#), , our YAP highlighted some of the impacts, both positive and negative, that AI has on their rights as children and young people.<sup>17</sup>

Firstly, they raised the issue of AI in relation to their right to education. Many young people already use AI to help with their schoolwork. It can be a helpful tool when we need to catch up on study, carry out research, or summarize information. On top of that, YAP also believe that, if used sensibly, AI has the potential to assist teachers too – whether it's by helping to reduce heavy workloads or by creating efficient ways to monitor student progress. At the same time, YAP members recognised that becoming overly dependent on AI can impact on young people's ability to think critically, creatively, and independently. They said that: "AI should be used as a tool, not a crutch and not take away our ability to be self-reliant".

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<sup>16</sup> Ombudsman for Children's Office (2025), [Policy Spotlight on AI: A Children's Rights Review](#).

<sup>17</sup> Ombudsman for Children's Office (2025), [AI and Us: Young People's Views and Understanding of Artificial Intelligence](#).

They also highlighted their concerns about the impact of AI on children's right to be kept safe from harm. They noted that many Chatbots still do not have the necessary safety features to guarantee that the responses children receive are age appropriate. Children – especially younger ones - risk being exposed to material that is offensive or distressing, or having their personal data stolen and used without their consent. YAP members also felt much more must be done to prevent the use of AI to create fake images of young people that can then be exploited for cyberbullying and even abusive material.

The YAP reinforced these views in our consultation with them this January, expressing renewed concern around AI-generated content of children, particularly by GROK, X's AI. They welcomed new Government advertising (Data Protection Commission) around the risks of parents posting images of their children online and wished for more promotion of such. However, they also worried about how AI could be used to generate misinformation and disinformation that younger children especially could be susceptible to believing, particularly when that information is conveyed by AI-generated videos of popular cartoon characters or YouTubers.

Finally, in the course of our work with them, several YAP members have highlighted the impact of AI on children's right to grow up in a clean and sustainable environment. They noted their concern that, with the use of AI expanding, data centres in Ireland would require increasing volumes of water and energy.

## Recommendations

- 1. Take a children's rights approach in all law, policies and strategies. This must include involving children routinely in governance structures and decision-making relating to AI law, regulation and policy.***
- 2. Involve children's rights and human rights experts and organisations in the development of law and policy on AI, including in AI governance structures.***
- 3. Allocate sufficient funding and resources to nominated fundamental rights bodies to ensure the effective discharge of powers in relation to fundamental rights under Article 77 of the EU AI Act.***
- 4. Review and recategorize chatbot as high risk under the EU AI Act in recognition of the significant risks they present to children.***
- 5. Ensure AI technologies in education adhere to children's rights standards, including by conducting child rights impact assessments (CRIA) of AI technology being considered for use in education and adopting procurement requirements that include criteria on child's rights design.***

- 6. Ban “nudification” apps and fill any gaps in Irish legislation relating to child sexual abuse and sexual exploitation facilitated by AI and child sexual abuse material generated by AI, including a prohibition of deepfake abuse.**
- 7. Require companies to put in place:**
  - a. Clear warnings, content monitoring apps and ways to block inappropriate AI content;**
  - b. Age-verification to access AI content and tools;**
  - c. Clear notifications that AI is being used;**
  - d. Blocking options, so you don’t have to see AI generated content unless you want to;**
  - e. Opt-outs of AI harvesting, so that AI can’t take and use content that children have developed themselves.**
- 8. Ban harmful use of AI, for example: theft and misuse of children’s personal data (including images); accessibility of age-inappropriate content, misinformation and disinformation; political misuse of AI; and corporate fraud**

## Digital Literacy and Digital Inclusion

Digital literacy and digital inclusion are two key factors when developing a holistic approach to respecting children’s rights in the digital environment. International children’s rights guidance recommends that States should actively invest in, and promote, the opportunities offered by the digital environment to realise children’s right to education. The Committee states that use of digital technologies in schools can enable and enhance children’s access to education, and strengthen engagement between the teacher and learners.<sup>18</sup> The Council of Europe notes that “it is important that the knowledge and resources of the digital environment are available to all children in a way that is inclusive and takes into account children’s evolving capacities and the particular circumstances of children in vulnerable situations.”<sup>19</sup> The Committee and Council of Europe emphasise the need for digital literacy to be made a core part of the curriculum throughout all school years, which develops

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<sup>18</sup> UN Committee on the Rights of the Child (2021), *General comment No. 25: [on children’s rights in relation to the digital environment](#), CRC/C/GC/25*, para. 99.

<sup>19</sup> Council of Europe (2018), *[Guidelines to respect, protect and fulfil the rights of the child in the digital environment: Recommendation CM/Rec\(2018\)7 of the Committee of Ministers](#)*, p. 18.

children's competencies to use technologies and to understand the risks and opportunities of the digital environment.<sup>20</sup> They also recommend training for teachers on safeguards relating to the digital environment, as well as digital literacy education for parents.<sup>21</sup>

In [One Size Does Not Fit All](#), a report on the use of smartphones in schools, this Office highlighted the need for the Department of Education and Youth to provide sufficient resources for the improvement of schools' digital infrastructure to bridge the digital divide between schools and students, enabling equitable access to technology for students in all schools. The report also recommends that the cost of digital technologies must not fall on families as it amplifies inequalities.

### Perspectives of the OCO YAP

In the same report, [One Size Does Not Fit All](#), YAP members identified a lack of preventive approaches taken in their schools to support students to act responsibly when it comes to the use of phones. When asked about their experiences of learning how to use phones appropriately in school, the YAP provided mixed responses. The YAP noted that the standard of education on the digital environment and technology was "not great". Some YAP members said they did not receive education on digital skills or stated that the skills classes were "Microsoft based and boring". Other students said they did receive media literacy classes as part of their school's extracurricular programme, but these were only for students who did coding classes and therefore many were excluded. Some YAP members spoke about learning about using phones primarily from experience, or from parents or siblings.

During our January 2026 consultation, members of our Youth Advisory Panel highlighted the cost of devices, subscriptions and poor internet connectivity in rural areas as access barriers. Most had access to iPads or laptops through their schools, but there was variation as to whether students were required to pay for the devices. Some recounted experiences where students went without the technology they needed because their devices had broken and neither they nor the school could afford a new one, making it harder to complete educational assessments. Other schools had sharing systems for devices, which worked quite well. Some members identified a need for more online resources for Irish speakers, as well as enough digital resources to support young people with disabilities. Lastly, the YAP identified a gap in learning around the digital environment. They highlighted the key role parents and guardians can play when it comes to equipping children with digital skills. They suggested that parents' own lack of digital skills, or their reluctance for their child to use digital technology, could result in some young people falling behind their peers if opportunities to develop digital skills are not provided for all as part of the curriculum.

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<sup>20</sup> Council of Europe (2018), [Guidelines to respect, protect and fulfil the rights of the child in the digital environment: Recommendation CM/Rec\(2018\)7 of the Committee of Ministers](#), pp. 18-19.  
& UN Committee on the Rights of the Child (2021), [General comment No. 25: on children's rights in relation to the digital environment, CRC/C/GC/25](#), para. 104.

<sup>21</sup> Council of Europe (2018), [Guidelines to respect, protect and fulfil the rights of the child in the digital environment: Recommendation CM/Rec\(2018\)7 of the Committee of Ministers](#), pp. 18-19.  
& UN Committee on the Rights of the Child (2021), [General comment No. 25: on children's rights in relation to the digital environment, CRC/C/GC/25](#), para. 104.

## Recommendations

- 1. Invest in and develop a National Digital Literacy Campaign. As recommended by the Online Safety Taskforce, digital literacy 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.*
- 2. Prevent widening the digital divide. A key pillar of a national digital literacy campaign should focus on digital inclusion by ensuring the full participation of children from marginalised or disadvantaged backgrounds. This should also guarantee there is equal access to digital resources, good quality internet connection, knowledge and training.*
- 3. Invest in the digital infrastructure in schools so all children can engage with the digital environment and digital literacy skills on an equal basis and where costs are not a barrier to digital inclusion.*