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

July 2025

Tirohanga Whānui | Overview

The New Zealand Council of Christian Social Services (NZCCSS) welcomes the opportunity to provide feedback on the Inquiry into the harm young New Zealanders encounter online, and the roles that Government, business, and society should play in addressing those harms.

We support the kaupapa to identify solutions to address the harm young New Zealanders encounter online. NZCCSS upholds children's rights as active digital citizens and supports safe participation in online spaces. We make the following recommendations regarding the role of government and other parties in relation to online harm experienced by children and young people in Aotearoa New Zealand, taking into consideration the potential benefits and harmful impacts of screen use and access to online spaces across all stages of childhood.

Taunakitanga | Recommendations

Our main points are:

1. Ensure responses and solutions balance children's rights to provision, protection and participation under the UN Convention on the Rights of the Child, informed by appropriate professional expertise across a range of domains (such as education and health) and the expertise of children and young people. This includes ensuring children are active participants in the shaping of any legislation, regulations, guidelines or resources associated with preventing online harm to children. We refer to Save the Children New Zealand's submission on this topic, and research exploring children and young people's perspectives and recommendations in relation to online harm, such as Online Safety in Aotearoa New Zealand (Save the Children NZ, 2025) and "I'm just content to them": Children living through sexual exploitation in Aotearoa NZ, (EPCAT, 2025).

2. Focus solutions on upholding children's wellbeing and safe participation across the range of online spaces children engage in, the range of settings in which children engage, and devices through which children engage, rather than taking a narrow focus on one aspect only (such as on social media only, or mobile phone use only).

3. Exploration of an Online Safety Act to support a common understanding of online harm and the roles and responsibilities of government, technology providers and those working alongside children and young people. We refer to the Online Safety Act introduced by the United Kingdom, the Digital Services Act in the European Union and the Australia's Online Safety Act. Currently New Zealand is heavily reliant on our Films, Videos, and Publications Classification Act 1993 for the regulation of online content and requires more

comprehensive legislation to provide appropriate regulation in relation to online harm and internet use.

4. Introduce regulation (such as through an Online Safety Act) to increase accountability and enforce compliance relating to technology providers' responsibilities to ensure online spaces are safe for children and young people. This includes requirements to:
    a. Strengthen age-related content restrictions to prevent children encountering harmful content (including within advertising) and prohibit the use of algorithms that drive children and young people's exposure to harmful content.
    b. Strengthen age-related restrictions to limit inappropriate and/or harmful contact between adults and children in online spaces (such as gaming), rather than preventing children and young people from accessing these spaces altogether.
    c. Strengthen requirements around the provision and accessibility of functionality to mitigate the risks of addiction.
    d. Strengthen the accessibility of functionality that protects children and young people's privacy, including in relation to sharenting and the "right to be forgotten" (Peleg & Varadan, 2025, p.174).
    e. Respond promptly and effectively to complaints made by children and young people, or by adults on their behalf, about harmful content encountered online by children and young people.

5. Increase investment in education for teachers and education professionals, noting the role they currently play in supporting children's access to online content, the fact that students in many settings are likely to have more advanced understanding of online spaces than their educational leaders, and the high use of screens within educational settings in Aotearoa New Zealand compared to other nations (University of Auckland, 2024). Building on resources such as the Paediatric Society of New Zealand's [Recommendations for the use of digital technologies in educational settings](#) and the Ministry of Education's [Digital Technologies: Safe and responsible use in schools resources](#) is recommended.

6. Strengthen guidelines and increase the provision of education for whānau and caregivers. This should take a holistic focus to encompass support throughout all stages of childhood and youth, comprising:

    a. Guidelines around age-appropriate screen use and/or screen exposure, including considerations in relation to children and young people's physical and mental wellbeing and the impact of parenting practices on children and young people's screen use.

    b. Increasing parent/caregiver understanding of the types of harm that children and young people may encounter, strategies for the prevention of online harm and avenues for support where harm occurs, noting again that this is a domain where children and young people's expertise may be more advanced than that of their parents and caregivers. Inclusion of whānau resources such as those developed by [NetSafe](#), [The Light Project](#) and the [Paediatric Society of NZ](#) is recommended.

    c. Increasing understanding of the impact of adult screen use on parent-child relationships (Swider-Cios et. al, 2023).

7. Enhance support for children and young people to develop digital citizenship skills, navigate online spaces safely in regard to content, contact and screen use behaviour, and raise and respond to concerns relating to their digital lives.

8. Examine and identify responses to the possible drivers of excessive screen use within cohorts of children, noting the link in international research between socioeconomic deprivation and increased exposure to screens among children (Gath et. al, 2023). Recent research by Monk et al., (2024) identified that higher levels of screen use were associated with negative outcomes in early childhood. Greater examination within the Aotearoa context might explore further how factors such as socioeconomic deprivation, a lack of parenting support, level of participation in early childhood education, lack of access to childcare, unaddressed behavioural/developmental challenges or difficulties with peers may relate to children and young people's screen use (Morawska et al., 2023).

9. Examine the positive benefits of digital engagement on children's holistic development to identify what aspects of digital use could be strengthened to improve outcomes for children, noting that much research on digital access and use focuses on identifying negative impacts of children's exposure and engagement (OECD, 2025). This should include a focus on the right to provision (under UNCROC) and the impact of any digital divide on outcomes for children and young people (Peleg & Varadan, 2025).

10. Evaluate the effectiveness of current government initiatives in this domain (e.g. banning mobile phone use in schools), with inclusion of child/youth perspectives.

11. Greater investment in social-emotional development support for children and young people during their middle years and adolescence noting the impact of peer relationships, bullying and mental health on children's wellbeing and attendance/engagement in education (Education Review Office, 2022).

12. We refer also to the broad set of recommendations of Cullen et. al, (2024) which relate to several of the points above.

Ngā Tohutoro | References

Cullen, J., Muntz, A., Marsh, S., Simmonds, L., Mayes, J., O'Neill, K., & Duncan, S. (2024). *Impact of digital technologies on health and wellbeing of children and adolescents: A narrative review.* New Zealand Journal of Physiotherapy, 52(1), 62–77. https://doi.org/10.15619/nzjp.v52i1.364

Education Review Office. (2022). *Missing Out: Why Aren't Our Children Going to School? – Summary* https://evidence.ero.govt.nz/media/rszfjzye/missing-out-why-arent-our-children-going-to-school-summary.pdf

Gath, M., Gillon, G., McNeill, B & Woodward, L. (2023). *Assessing the Impact of Screen Time on Children's Language, Educational Ability, and Social Functioning from Infancy to Age 8.* https://www.msd.govt.nz/documents/about-msd-and-our-work/publications-resources/research/assessing-the-impact-of-screen-time-on-children-s-language/gath-research-report.pdf

Monk, J., Prickett, K., Grimes, A., & Morrison, P. (2024). *The effect of income on New Zealand children's behaviour: The influence of maternal stress and children's screen use*. Motu Economic & Public Policy Research. https://www.motu.nz/assets/Documents/our-research/Income-and-child-behaviour-Working-Paper-FINAL.pdf

Morawska A, Mitchell AE, Tooth LR. *Managing Screen Use in the Under-Fives: Recommendations for Parenting Intervention Development*. Clin Child Fam Psychol Rev. 2023 Dec;26(4):943-956. doi: 10.1007/s10567-023-00435-6. Epub 2023 May 12. PMID: 37171529; PMCID: PMC10640456.

OECD (2025). *How's Life for Children in the Digital Age?* OECD Publishing, Paris, https://doi.org/10.1787/0854b900-en.

Peleg, N. & Varadan, S. (2025). Contemporary children's rights issues in middle childhood. In Todres, J. & Kilkelly, U. *Children's rights and children's development: an integrated approach*. New York University Press. Pages 158-186

Swider-Cios, E., Vermeij, A., & Sitskoorn, M. (2023). *Young children and screen-based media: The impact on cognitive and socioemotional development and the importance of parental mediation*. Cognitive Development, Volume 66, April-June 2023, 101319. https://doi.org/10.1016/j.cogdev.2023.101319

University of Auckland (2024). *Excessive screen-time bad for kids' health.* https://www.auckland.ac.nz/en/news/2024/04/15/Excessive-screen-time-bad-for-kids.html

Ko wai tātou | Who we are

NZCCSS has six foundation members; the Anglican Care Network, Baptist Churches of New Zealand, Catholic Social Services, Presbyterian Support and the Methodist and Salvation Army Churches.

Through this membership, NZCCSS represents over 100 organisations providing a range of social support services across Aotearoa. Our mission is to call forth a just and compassionate society for Aotearoa, through our commitment to our faith and Te Tiriti o Waitangi.

Further details on NZCCSS can be found on our website - www.nzccss.org.nz.

Ingoa whakapā | Contact Name

Alicia Sudden   ceo@nzccss.org.nz
Melanie Wilson