

Social Media Bans May Put Children at Greater Risk

An interview with
Jeremy Godfrey,
Executive
Chairperson of
Coimisiún na Meán,
Ireland's independent
media regulator.



REGULATION

Proportionate
Evidence-based
Rights-respecting



CONTENT MODERATION

Harm reduction
Transparency
Accountability



AGE ASSURANCE

Harm reduction
Transparency
Accountability

DIGITAL SERVICES ACT

GDPR

World opinion is divided on Australia's blanket ban on social media for use by children under age 16. Meanwhile, the European Union recently announced its approach to social media regulation, drawing a distinction for children under 13 but stopping short of imposing a strict ban. The EU's approach reflects a broader European debate over how to strengthen protections for children without adopting a blanket prohibition. As these discussions continue in Europe, Washington CORE spoke with Jeremy Godfrey, Executive Chairperson of *Coimisiún na Meán*, Ireland's independent media regulator.



Harmful Content on the Rise Due to Increased Advertising

Around 2008 and 2009, when its use first became widespread, social media served as a tool for people to connect and build communities. Since then, social media platforms are increasingly shaped by algorithmically driven feeds and advertising-based business models. This has resulted in an increase of toxic or inappropriate content, addictive design features, and the possibility of children being contacted by unknown adults.

The evolution of social media is known as “enshittification,” a term coined by author and technology critic Cory Doctorow to describe the deterioration of platforms. A platform that initially provided a valuable service to users may gradually undermine their interests

as it begins to prioritize advertisers and other business customers. Addressing the resulting harm requires placing meaningful responsibility on platform operators.

The importance of protecting children is widely recognized across countries and regions. In Europe, the United States, China, and elsewhere, policymakers and regulators have expressed similar concerns about platform features that may harm children. Although regulatory approaches differ—from blanket bans on social media, as seen in Australia, to requirements that platforms design safer services for young users—all depend on effective age assurance to determine which protections or restrictions should apply to each user.

The goal is for these methods to be as non-intrusive as possible and designed to protect users' privacy.

For example, a system could confirm that a user is over a certain age without requiring the platform to know the user's identity or retain their personal information.

Doubts About the Effectiveness of the “Australian Approach”

International thinking seems to be shifting away from Australia-style blanket bans as their potential disadvantages become clearer. Children are resourceful when it comes to circumventing restrictions and may still gain access to services that widely considered to be age inappropriate or even harmful.

Children have told regulators that if they circumvented a ban and later encountered trouble online, they might hesitate to seek help because doing so would reveal that they had accessed a prohibited service. A blanket ban could therefore make some situations more dangerous rather than less. Godfrey stressed that children and their

representatives should be involved in the policymaking process, as their experiences can reveal unintended consequences that regulators might otherwise overlook.

At the same time, children who are completely excluded from social media may lose access to positive online experiences, including educational opportunities and supportive communities. An Australia-style blanket ban may also overlook children's rights to expression, access to information, and positive participation online. Godfrey questioned whether blanket bans would prove effective, noting that children may still gain access through ineffective age-assurance systems or VPNs.

The Path of a “Presumptive Ban”

Another approach is a “presumptive ban,” under which services could not be offered to children unless the provider demonstrated to an independent third party, regulator, or assurance body that the service was safe—or, at minimum, that it did not contain identified dangerous features.

Under this approach, platform operators would have an incentive to create safer services. Children would also have less incentive to circumvent restrictions to access unsafe services. Greater consistency across nations could also reduce the incentive to use virtual private networks to access less-regulated versions of a service elsewhere.

Godfrey added that protections should not end at age 16, noting that 16- and 17-year-olds are still children and may also require age-appropriate safeguards.

“Services could therefore be classified according to age, much like films.

- JEREMY GODFREY

Executive Chairperson of Coimisiún na Meán

Some movies are rated for ages 14 and up, while others are rated for ages 18 and up. There may also be movies that require parental consent. This does not mean that children are barred from entering movie theaters.

Similarly, social media access could vary by age group rather than being governed by a single blanket rule. Translating this type of age-based approach into practice, however, would require clearer and more consistent standards across jurisdictions.

Cooperation at the European level could encourage platform operators to pay closer attention. EU-wide action may also be more effective than fragmented national measures because the EU represents a large market whose rules major platforms cannot easily ignore.

The EU is expected to announce by autumn 2026 whether Europe will move toward a social media ban, a presumptive-ban model, or another form of stronger protection.

Whatever regulatory model ultimately emerges, Godfrey emphasized that the primary responsibility for protecting children should remain with platform operators. Governments should establish standards, monitor compliance, and take enforcement action when necessary. Platforms, however, should not be allowed to outsource responsibility for content moderation or child safety to public authorities. Godfrey compared this division of responsibility to toy safety standards: governments establish and enforce the rules, but manufacturers remain responsible for ensuring that their products comply with them.



Jeremy Godfrey is the Executive Chairperson of Coimisiún na Meán, Ireland’s media regulation and promotion agency. He has over 30 years of experience in regulation, government agencies, and the industry across the telecommunications, technology, and online sectors in Ireland, Hong Kong, and the United Kingdom. He has been involved in the development of European Union (EU) regulations such as the Digital Services Act (DSA), the Digital Markets Act (DMA), and the Open Internet Rules. During his tenure as Chief Information Officer (CIO) for the Hong Kong government, he was responsible for e-government programs and cloud computing strategies, as well as internet governance, digital inclusion, and promoting online safety.

WASHINGTON | CORE

Washington CORE is an independent research and consulting firm headquartered in Washington, D.C., providing strategic research, analysis, and advisory services. Leveraging in-depth research capabilities and an extensive global network of experts across the public and private sectors, we deliver clarity and insight to prepare our clients for success in an ever-changing global landscape.

Learn about us more at

<https://www.wcore.com>

Contact us

<https://www.wcore.com/home/contact/>