Submission to Education and Workforce Committee: Inquiry into the harm young New Zealanders encounter online, and the roles that Government, business and society should play in addressing those harms

> " "Social media is treated by older generations as a separate entity from reality, when in fact it has become part of our social fabric. This makes it hard to have these conversations with older generations."
>
> (Whāraurau Youth Advisors, Young people speak out about Wellbeing, 2022)[1]

As the independent advocate working for and with mokopuna (children and young people), Mana Mokopuna – Children and Young People's Commission (Mana Mokopuna)[2] welcomes this opportunity to submit on the inquiry into the harm mokopuna in Aotearoa New Zealand encounter online, and the roles that Government, business, and society should play in addressing those harms.

The Chief Children's Commissioner is available to discuss this submission, and anything related to the Committee's Inquiry in an oral hearing, should the Committee wish to.

Summary

1. All mokopuna have the right to be safe from harm in all circumstances, in both their physical and online environments. This is a basic right of all children, under the UN Convention on the Rights of the Child (the Children's Convention).

2. As with the physical environment in our country, there is clear evidence of mokopuna experiencing harm in the digital spaces that are part of their lives. More needs to be done to support mokopuna and safeguard their rights and wellbeing while online, to prevent mokopuna from experiencing harm and to equip them to navigate the digital spaces in their lives. Despite children comprising one in three internet users, online

---

[1] Te Hiringa Mahara the Mental Health and Wellbeing Commission (2022). *Young people speak out about Wellbeing: An insights report into the Wellbeing of Rangatahi Māori and other Young People in Aotearoa*. Youth-Wellbeing-Insights-Report-Full.pdf (mhwc.govt.nz)

[2] Mana Mokopuna – Children and Young People's Commission is the independent Crown entity with the statutory responsibility to advocate for the rights, interests, participation and well-being of all children and young people (mokopuna) under 18 years old in Aotearoa New Zealand, including young persons aged over 18 but under 25 years if they are, or have been, in care or custody. At Mana Mokopuna we have adopted the term 'mokopuna' to describe all children and young people in Aotearoa New Zealand. 'Mokopuna' brings together 'moko' (imprint or tattoo) and 'puna' (spring of water). Mokopuna describes that we are descendants, and or grandchildren, and how we need to think across generations for a better present and future. We acknowledge the special status held by mokopuna in their families, whānau, hapū and iwi and reflect that in all we do. Referring to children and young people we advocate for as mokopuna draws them closer to us and reminds us that who they are, and where they come from, matters for their identity, belonging and well-being at every stage of their lives.

spaces are predominantly designed for adults and often fail to meet the needs of mokopuna.

3. However, it is also clear that mokopuna can and do thrive in the digital world. While mokopuna would like more protections - control over advertising, steps taken to stop harmful or mean content and addictive and harmful algorithms, parental support and knowledge, and mechanisms to ensure age-appropriate access, for example[3] - the internet is a place where many mokopuna make connections, express themselves, find information, explore the world and play.

4. A children's rights-based approach to preventing, mitigating, and responding to online harm is holistic. Children's rights offer a practical tool for striking the appropriate balance between solutions that protect mokopuna from harm, allow them to safely be active participants in the digital world, and provide them with access to the information, services and supports to grow up healthy and well – which are also among their basic rights. Mana Mokopuna advocates for centring children's rights in the digital environment. This includes children's rights considerations for mokopuna Māori, and mokopuna belonging to indigenous and/or minority groups, such as mokopuna whaikaha and Rainbow mokopuna.

5. The Government has a central role to play in establishing the legislative and policy settings that keep mokopuna safe online, as the primary duty bearer under the Children's Convention.

6. Internet, tech, and social media companies also have a critical role to play in ensuring that the rights of mokopuna are upheld and that, collectively, we create safe digital environment for all mokopuna.

7. These roles are particularly important given the rapid growth in AI.

8. Parents, caregivers and whānau have crucial roles to play too, supporting mokopuna to be safe online, and being well-equipped with knowledge about the opportunities and challenges that exist in digital spaces for mokopuna at different ages and in different contexts.

9. Mokopuna themselves hold the solutions to address online harm, as the foremost knowledge-holders about their own lives. Solutions that come from the direct experiences and ideas of mokopuna are more likely to be effective because they are informed by their realities and lived experience. Comprehensive digital world education for both mokopuna and parents, caregivers and whānau; more robust content moderation and accountability for tech companies and social media platforms; digital wellbeing programmes; promotion of positive content; ensuring accessible ways to seek help when feeling uncertain or unsafe; and considering children and their rights proactively in the development of new digital technologies including AI, are all examples of measures to improve online safety for mokopuna, and are things that mokopuna themselves have said are important to them.

10. This submission provides information on the nature of harm experienced by mokopuna online and recommends to prevent harm for mokopuna, that:

---

[3] These were four options for improving online safety chosen by mokopuna in a recent survey conducted by Save the Children New Zealand and Netsafe STC-NetSafe-Online-Safety-Report-2025.pdf

a. Mokopuna are consulted and regarded as active participants in the digital world, and their views and ideas are central to and meaningfully considered in developing solutions to online harm, including before any steps are taken to restrict social media access for children and young people.

b. Ongoing work is undertaken to monitor how the digital world affects mokopuna and, given its rapid and widespread evolution, to proactively develop, update, and implement online safety measures in Aotearoa New Zealand.

c. Solutions and responses to online harm prioritise education and support that equips mokopuna to navigate the digital environment and social media safely, alongside up-to-date guidance for adults to support them in these spaces.

d. The Government more strongly focuses on regulating digital and tech companies, including social media platforms, with a specific focus on regulating to prevent harm for mokopuna online and holding these companies and platforms accountable for harm to mokopuna.

e. The Government requires that mokopuna and their rights are proactively put at the centre of the development of policy and governance relating to AI, recognising that children's lives are already being impacted by AI, and that mokopuna should be actively engaged in work to share their views on AI and how they want to see it developed and governed.[4, 5, 6, 7]

Introduction

11. Mokopuna have the right to be safe in all the spaces they live their lives, including online. Mana Mokopuna welcomes this Inquiry and the intent to safeguard the wellbeing of mokopuna in the digital environment.[8]

12. Child harm and maltreatment is a problem in Aotearoa New Zealand and many of the issues associated with online harm are not unique to the digital world. In 2023, the United Nations Committee on the Rights of the Child identified the need for urgent action to address all forms of violence against children in Aotearoa New Zealand, including bullying and sexual exploitation and abuse, all of which can occur online. The principles that underpin effective approaches to eliminating exploitation, violence, and harm in the physical world can also apply in the digital world. Aligning responses to online harm with responses to wider child maltreatment in non-digital spaces is something we advocate for, to promote consistency and strengthen effectiveness.

---

[4] Children and AI | The Alan Turing Institute
[5] Exploring Children's Rights and A.I - Children's Parliament
[6] Children & AI - 5rights
[7] How should children's rights be integrated into AI governance?
[8] According to General Comment No.25 (2021) - *the digital environment is constantly evolving and expanding, encompassing information and communications technologies, including digital networks, content, services and applications, connected devices and environments, virtual and augmented reality, artificial intelligence, robotics, automated systems, algorithms and data analytics, biometrics and implant technology.*

13. Mokopuna themselves recognise and advocate for online safety mechanisms to be strengthened in Aotearoa New Zealand, so they can be safe in these spaces.[9] They want guidance and support to manage online harm and effective options seek help when they need it.[10]

14. Solutions to address online harm, including the negative impacts of social media, must be led by and with mokopuna to ensure they are practical and effective. It is their right under Article 12 of the Children's Convention to be listened to on matters affecting them, and they are experts in their own lives, holding the greatest understanding of the complexities between the digital environment and mokopuna themselves[11].

In the words of a mokopuna who has recently spoken about this in the national media:

"Young people are the future, and we are going to inherit all these decisions that are being made, ... so why not discuss them with us now and often you will find that young people will have solutions for the problems that you are putting forward".[12]

What this submission covers

15. This submission is focused on supporting the Inquiry to be informed by a children's rights approach and to adopt this in its consideration of online harm prevention for mokopuna. This is important given Aotearoa New Zealand's duties and obligations as a States Party to the Children's Convention. In the initial part of this submission, we provide contextual information and comment for the Committee's consideration on:

    a. applying children's rights in relation to online harm

    b. how the online world can support mokopuna to live and thrive, and

    c. the rights of mokopuna Māori and the importance of giving effect to te Tiriti o Waitangi when looking for solutions to online harm.

In the latter part of this submission, we focus in on the nature, severity and prevalence of online harm and the roles that Government, business, and society should play in addressing those harms.

Applying children's rights to the issue of online harm

16. Although government is the main duty bearer under the UN Convention on the Rights of the Child (the Children's Convention), business and civil society also have responsibilities to prioritise and uphold children's rights.

17. The Children's Convention provides a framework for analysing the issues associated with online harm and developing effective, holistic and balanced responses because it helps us to:

---

[9] https://www.women.govt.nz/sites/default/files/2021-08/NZ-teens-and-digital-harm_statistical-insights_2018%20%281%29.pdf
[10] Content that Crosses the Line: Conversations with young people about extremely harmful content online | Classification Office
[11] The teens saying no to social media (and yes to brick phones) | RNZ
[12] PM needs to speak with Gen Z on social media ban - adviser | RNZ

a. consider the diversity of mokopuna and their experiences, and the impacts of initiatives on different groups of mokopuna (Children's Convention Article 2 – non-discrimination)

b. make decisions that are in the best interests of mokopuna (Children's Convention Article 3 – best interests), considering their holistic rights which are interdependent and indivisible

c. do everything possible to maximise the survival and development of mokopuna (Children's Convention Article 6 – right to life, survival and development), and

d. uphold the right of every mokopuna to participate in their own lives and things that are important to them. (Children's Convention Article 12 – participation).

18. In addition to the right of every child to be safe, upholding children's rights in the digital world requires consideration of children's rights to, amongst others, access to information,[13] freedom of expression,[14] identity,[15] and privacy.[16]

19. The United Nations Committee on the Rights of the Child's General comment No. 25 (2021) on children's rights in relation to the digital environment provides practical guidance on considering children's rights in the digital environment, and striking the appropriate balance between protection, provision, and participatory rights. International consultations with States, experts, and other stakeholders, including children, informed the development of this guidance. It recognises that innovations in digital technologies affect children's lives and their rights in ways that are wide-ranging and interdependent. While meaningful access to digital technologies can support children to realise the full range of their rights, if digital inclusion is not achieved, existing inequalities are likely to increase and new ones may arise. Please see **Appendix 1** for more detailed information on centring children's rights in the digital environment.

20. Also relevant to this inquiry is the UN Committee on the Rights of the Child's General comment No. 16 (2013) on State obligations regarding the impact of the business sector on children's rights. Tech companies and social media sites hold significant power over the everyday interactions of mokopuna in the digital environment. They are responsible for the algorithms, content management and reporting and response practices that govern these spaces. General Comment No.16 provides guidance on the responsibilities of the Government, as primary duty-bearer under the Children's Convention, to ensure corporate accountability for the promotion, protection and respect of children's rights in the digital world.

21. We urge the Education and Workforce Committee to ensure that the Inquiry is strongly informed by the guidance in these two general comments from the UN Committee on the Rights of the Child, as well as the Children's Convention itself.

---

[13] Article 17, United Nations Convention on the Rights of the Child
[14] Article 14, United Nations Convention on the Rights of the Child
[15] Article 8, United Nations Convention on the Rights of the Child
[16] Article 16, United Nations Convention on the Rights of the Child

Mokopuna exist and can and do thrive in the digital world

> ❝ "A safe community [Upsouth] to share your voice to other people and earn a few bucks. Young people like me who can't get a job at this age can earn money just for showing our creativity and talent that we have to our community."
>
> (Young person via an Animated Video, My Experience with Upsouth 2018)[17]

Mokopuna actively participate in the digital world

22. Mokopuna in Aotearoa New Zealand, like children and young people around the world, are active participants in the digital world, using social media and digital tools to learn and share knowledge, express themselves, connect with others, and shape their identities. Many mokopuna engage in digital storytelling, share their perspectives, and create content that resonates with their communities online.[18] Some mokopuna are active in the digital world as a way to advocate for change on the matters that are important to them and that affect their lives. This active involvement of mokopuna in the digital world in a range of ways shows how mokopuna are not just consumers of digital content, but are shaping the digital environment, and indeed it can be a space where mokopuna can and do thrive.

Social media is important to mokopuna, their connections and wellbeing

23. Recent research by the University of Auckland informed by the direct voices and views of mokopuna themselves highlights that social media is an important part of young people's lives, and it is important for connecting with others and their social wellbeing.[19] It also notes that young people are aware of the risks associated with social media and emphasises that the risks/negative impacts are not necessarily avoided by abstaining from social media use.

Mokopuna access support in the digital world

24. The digital environment holds much potential to support mokopuna when issues might arise for them, including, for example, relating to their mental health and wellbeing. In a recent inquiry by the Office of the Auditor General, young people specifically shared that they want to access services for their mental health which includes online support.[20] For more examples and ideas that are informed by mokopuna, please refer here: <u>What young people want from mental health services: a youth informed approach for the digital age</u>.

---

[17] Digitally enabling Rangatahi (youth) and their Whānau (families) to build critical and creative thinking toward more active citizenship in Aotearoa New Zealand via <u>My Experience with Upsouth - Why should you join?</u>

[18] <u>"Social media gave me my life." Recognition, adolescence, and political identity in the algorithmic era: Coming of age online in Aotearoa New Zealand</u>

[19] <u>Our-Voices_Social-Connections_In-Person_and_Online_Final.pdf</u>

[20] <u>Meeting the mental health needs of young New Zealanders — Office of the Auditor-General New Zealand</u>

Mokopuna celebrate their culture and identity online

25. Social media has become a space where young people can celebrate their culture, explore and shape their identity, connect with others who share similar cultural experiences, and advocate for their values and beliefs. For example, platforms like TikTok and Instagram have seen mokopuna Māori amplifying te reo Māori and kapa haka to express their cultural pride and connect with a local and global audience.[21] Rainbow mokopuna have also emphasised that social media enhances their wellbeing through exploring their identities, accessing resources, and connecting with peers.[22] Similarly, while there are barriers and impacts of the digital environment for mokopuna whaikaha (disabled children), many mokopuna whaikaha report increased connection and acceptance from being online and active on social media.[23]

Mokopuna use digital platforms to express their view, engage and advocate

26. Many mokopuna are using digital platforms to voice their opinions and advocate on social and political issues that are important to them, impact their day-to-day experiences, and which can have intergenerational consequences. This includes raising awareness about climate change, advocating for mental health support, advocating against racism and discrimination, advocating for disability rights, and challenging harmful stereotypes.[24] For example, online advocacy was part of the mokopuna-led advocacy to ban single-use plastic bags in New Zealand.[25]

27. Social media allows mokopuna in Aotearoa New Zealand to engage with diverse cultures, perspectives, and global movements. For example, mokopuna can engage in international conversations about social justice, indigenous rights, and environmental issues. This exposure broadens their worldviews, helps them to build their knowledge of children's and human rights, and allows them to feel part of a global community, empowering them to contribute to global discussions and apply these learnings to their own social context in Aotearoa New Zealand.[26]

Mokopuna access information and education online

28. Mokopuna gain access to a wealth of information and educational resources from the digital world. During the COVID-19 pandemic there was a shift to online learning which supported continuity in education for many mokopuna.[27] Platforms like Google Classroom, Zoom, and educational YouTube channels provided mokopuna with tools to stay engaged with their studies.

Mokopuna stay connected with friends, family and communities online

29. Mokopuna stay connected with their peers, family, and communities in the digital environment. This is especially important when physical interaction may be limited, such as during the COVID-19 lockdowns, or for children living rurally. Online platforms provide a space for mokopuna to share experiences, offer emotional support, and build

[21] Indigenous Cultural Sustainability in a Digital World: Two Case Studies from Aotearoa New Zealand | SpringerLink
[22] Can Social Media Participation Enhance LGBTQ+ Youth Well-Being? Development of the Social Media Benefits Scale
[23] The Digital Age: Youth, Disability, and Mental Health
[24] Nurturing the political agency of young people in Aotearoa New Zealand 2023
[25] Plastic fantastic - petitions capture the public mood - New Zealand Parliament
[26] Confident, capable and world changing: teenagers and digital citizenship: Communication Research and Practice: Vol 6, No 1
[27] Experiences in times of COVID-19: Home-life, social connections, and schooling for Aotearoa New Zealand children

relationships. For example, a *Growing Up in New Zealand* study highlighted that almost 85% of children indicated that they felt moderately or strongly socially connected with others due to increased online connection during COVID-19 lockdowns.[28]

> "Meeting with friends/family on the Zoom app for games or quizzes."

<div align="right">(17-year-old boy, Life in Lockdown 2020)[29]</div>

30. The digital environment provides mokopuna with opportunities to engage in creative expression. Social media platforms and digital gaming have become outlets for mokopuna to share their art, music, dance, and other creative works, as well as to connect with other mokopuna in Aotearoa New Zealand and beyond. This creative freedom and space to play helps mokopuna develop skills, build confidence, relationships and foster a sense of achievement.[30]

> "[On Minecraft] You can build stuff and then you can fight people. And you get this stuff like diamonds and gold and emeralds.... We learn creativity and a lot of building instructions and sometimes you are going to rule the world."

(Mokopuna, Understanding children's use and experience with digital technologies 2017)[31]

31. Social media and digital platforms can serve as a vital source of emotional support for mokopuna, particularly for those who may face challenges like bullying, racism, discrimination, mental health struggles, or isolation.[32,33] Online communities and support groups can and do provide safe spaces where mokopuna can connect with others who understand their experiences.[34]

32. We urge the Committee to consider fostering 'digital citizenship' when considering solutions to online harm. NetSafe defines a 'digital citizen' as someone who:
    - demonstrates honesty and integrity and ethical behaviour in their use of Information and Communications Technology (ICT)
    - respects the concepts of privacy and freedom of speech in a digital world
    - uses and develops critical thinking skills in cyberspace, and
    - uses ICT to relate to others in positive, meaningful ways.[35]

---

[28] Experiences in times of COVID-19: Home-life, social connections, and schooling for Aotearoa New Zealand children - Meissel - British Educational Research Journal - Wiley Online Library

[29] https://www.manamokopuna.org.nz/documents/94/LifeinLockdown-OCC-Nov2020.pdf

[30] Understanding children's use and experience with digital technologies. Final research report. Victoria University, 2017.

[31] Ibid.

[32] Young People Talk About Digital Support for Mental Health: An Online Survey of 15–30-Year Olds in New Zealand - Garrett - 2024 - Health Expectations - Wiley Online Library

[33] "Social media gave me my life." Recognition, adolescence, and political identity in the algorithmic era: Coming of age online in Aotearoa New Zealand - University of Otago

[34] The Digital Age: Youth, Disability, and Mental Health

[35] Digital citizenship | TeachWell Digital

33. Although 'digital citizen' is not a term that many mokopuna use to describe themselves, digital citizenship is an important concept to support educators, parents and adults to understand the important role of the digital environment today in children's lives and in all our lives, and how to encourage positive, critical and competent engagement online.[36] Education focused on digital citizenship supports mokopuna to participate online and with social media in ways that are respectful of human rights, healthy relationships with peers and others, and dignity through the responsible use of technology.[37, 38]

The rights of mokopuna Māori – giving effect to Te Tiriti o Waitangi

❝ "Negativity about rangatahi Māori is what's splashed online."

(Rangatahi Māori, Māoriland, Young people speak out about Wellbeing. 2022)[39]

34. Research with mokopuna Māori shows that mokopuna Māori want a future embedded in values of fun, joy, and meaningful connections, where technology is a tool for positive engagement that fosters equality and access to opportunities. They imagine a society free from depression, poverty, racism, and vaping in schools, where Aotearoa respects Pacific and Māori cultures, honours Te Tiriti o Waitangi, and strengthens indigenous rights. Their vision includes enhanced use of technology to create limitless pathways, high-paying jobs, and a focus on passions beyond smartphones, while promoting environmental sustainability, business opportunities for youth, and global unity.[40] More broadly, research with rangatahi Māori highlights that for thriving wellbeing, rangatahi Māori want to be proud of their whakapapa and culture; express aroha for their whānau and tūpuna; connect to whenua or other spaces; spend time with people who matter to them; take care of body, mind, heart and spirit; and grow through shared experiences and trying new things.[41]

35. However, Mokopuna Māori in Aotearoa New Zealand face challenges in the digital environment. Often these are amplified versions of the challenges they encounter in their daily lives, such as racism and discrimination, misinformation, and stereotypical rhetoric, which further intensifies the impact on their wellbeing.[42] Cyberbullying and racist online content targeting mokopuna Māori are incredibly harmful and highlight the

---

[36] Young People (Re) conceptualising Digital Citizenship: Constructing Ways of Being and Doing Citizen (ship)'Online'

[37] Burns, T. and F. Gottschalk (eds.) (2019), Educating 21st Century Children: Emotional Well-being in the Digital Age, Educational Research and Innovation, OECD Publishing, Paris

[38] Digital citizenship : Keep It Real Online

[39] Te Hiringa Mahara the Mental Health and Wellbeing Commission (2022). *Young people speak out about Wellbeing* Youth-Wellbeing-Insights-Report-Full.pdf (mhwc.govt.nz)

[40] Empowering Rangatahi Voices in Shaping the Digital Future - Elle Archer

[41] Clark, T., Le Grice, J., et al, *Harnessing the Spark of Life: Maximising whānau contributors to rangatahi wellbeing,* Māori-specific results from the Youth19 Rangatahi Smart Survey, see: Rangatahi Māori — Youth19 - A Youth2000 Survey and Rangatahi Resource Final

[42] Investigating Enactments of Whanaungatanga in Social Media for Rangatahi Māori

need for safer digital environments that guard against the harm experienced by mokopuna Māori in the real world being exacerbated online.[43]

36. It is also important to consider the positive impacts of social media for mokopuna Māori, as already highlighted earlier in this submission. For some rangatahi Māori, platforms like Instagram and TikTok provide a positive space to express their identities, challenge stereotypes, and engage in decolonising practices. Mokopuna Māori are actively celebrating and sharing their culture and connecting with each other online, through social media. This can help strengthen their sense of identity, belonging and unity, while also promoting social justice, indigenous rights, and environmental sustainability.[44]

37. Kaupapa Māori research has highlighted the proliferation of social media and the ability for 'online whanaungatanga' to build connections.[45] Enabling mokopuna and whānau Māori to unite and provide each other support and strength is especially important for rangatahi Māori, wāhine Māori and takatāpui, as they experience high rates of online abuse and harassment.[46]

38. To uphold and protect the rights of mokopuna Māori in the digital environment, digital systems, platforms, and policies must be informed by the needs and aspirations of Māori, support their right to tino rangatiratanga, and uphold the provisions of each article of Te Tiriti o Waitangi.

39. Meeting kāwanatanga responsibilities and ensuring good governance over the digital environment (Article 1 of Te Tiriti) means ensuring that digital systems, regulations, and platforms are developed in ways that address concerns of mokopuna and whānau Māori. Policies need to protect Māori data sovereignty, guarantee equitable access to digital technology, and maintain cultural integrity within digital spaces.

40. In the digital world, tino rangatiratanga (Article 2 of Te Tiriti) means that mokopuna Māori should have control over how they engage with digital platforms, how their culture and identity are represented, and how their content and personal data are used. It also involves the ability to freely express Māori culture and ideas in digital spaces without fear of exploitation.

41. To ensure equitable outcomes for Māori (Article 3 of Te Tiriti - ngā tikanga kātoa rite tahi) mokopuna Māori must have equal access to digital technology, educational opportunities, and resources that enable them to thrive and experience digital inclusion on an equitable basis with other children and young people. To uphold the rights of mokopuna Māori, inequitable negative impacts of social media need to be proactively addressed.

42. Ensuring the digital environment supports spiritual and religious freedoms is part of upholding wairuatanga - spiritual wellbeing and religious freedoms – for mokopuna Māori (Article 4 of Te Tiriti). This may involve digital spaces that nurture a sense of belonging, support positive self-expression, and enable mokopuna Māori to avoid

---

[43] Cyberbullying Toward Māori Is Rife in New Zealand: Incidences and Demographic Differences in Experiences of Cyberbullying Among Māori

[44] MĀORI INSTAGRAM: THE SOCIAL MEDIA LIFEWORLDS AND DECOLONISING PRACTICES OF RANGATAHI MĀORI, 2020

[45] Full article: Te Tapatoru: a model of whanaungatanga to support rangatahi wellbeing

[46] Ibid; Manaaki Collective. 2021. About the Manaaki Collective, see https://themanaakicollective.nz/the-manaaki-collective/(open in a new window)

harmful content or experiences such as cyberbullying, extreme ideological and racist misinformation.

Māori data sovereignty

43. The control and ownership of Māori data is a key issue to be kept central when developing digital and social media policy, regulation and law.[47] Policies should protect Māori data sovereignty, ensure that Māori cultural and personal data are not exploited or misused, and that mokopuna Māori have the right to determine how their data is used.

Nature, severity, and prevalence of online harm

> "It is very different today now because you can be bullied in your own bedroom on the phone. That is a big thing we should be careful of. There is cyber bullying."
>
> (17-year-old Pākehā boy, What makes a good life?)[48]

44. International evidence and research within Aotearoa New Zealand shows interconnection between the negative impacts of being online and mental health concerns, with links to body dissatisfaction, disordered eating, low self-esteem, being over-whelmed by awareness of world events, uncertain futures including eco-anxiety, depression, anxiety, exposure to misinformation, cyberbullying, decreased sleep, and reduced in-person time with family and friends.[49,50] We have heard this recently from some mokopuna who shared their voices and views in our mokopuna voices report, *"You need to get in early, as soon as you see people struggling": Understanding the life-course journey.*[51] For some groups of mokopuna, including mokopuna Māori, Pacific mokopuna and rainbow mokopuna, the harms of the digital world are experienced more.[52]

45. Research and evidence highlights that increased rates of mental distress among mokopuna correlates with the rise of social media and access to digital devices.[53, 54]

46. Young people in Aotearoa New Zealand have some of the highest rates of screen use in the world, both at home and in the classroom, and researchers are concerned that the negative impacts of social media are exacerbated due to these high rates of screen time.[55]

---

[47] Māori data sovereignty and privacy, Tikanga in Technology Discussion Paper March 2023.
[48] https://www.manamokopuna.org.nz/documents/7/What-makes-a-good-life-report-OCC-OT-2019-WEB2.pdf
[49] Social media and Youth Mental Health
[50] Youth Wellbeing Insights Report | Te Hiringa Mahara—Mental Health and Wellbeing Commission
[51] You need to get in early - voices report | Mana Mokopuna at p.34
[52] Koi-Tu-Literature-Review-for-Te-Hiringa-Mahara-May-2023.pdf
[53] Social Media and Youth Mental Health
[54] The Digital Age: Youth, Disability, and Mental Health
[55] Time to reconsider device use in schools? - The University of Auckland

Inequities

47. Many inequities occur for mokopuna online. For example, mokopuna Māori, Pacific mokopuna and rainbow mokopuna report higher rates of discrimination and online bullying.[56] It is crucial to recognise the multifaceted nature of mokopuna experiences online – acknowledging that harm occurs, as well as positive experiences and impacts, for mokopuna.

Mental health

48. Mental Health is an issue that has been raised by researchers, practitioners and mokopuna themselves. Constant exposure to social media can contribute to anxiety, depression, and feelings of inadequacy. Young people may feel pressured to measure up to the curated, often unrealistic, portrayals of online content which can lead to significant emotional distress.[57] Accidental or intentional access to inappropriate adult sexual content online can result in unrealistic expectations of what relationships should be like, resulting in harmful behaviours by children and young people. Additionally, the addictive nature of social media can exacerbate these issues, with young people spending excessive amounts of time online, which can lead to poor sleep, heightened stress, and further mental distress.[58]

Body image

49. As recently reported by NetSafe and the Classification Office, body image concerns are heightened in the digital environment as social media platforms are saturated with images that promote unattainable beauty standards.[59] Young people are vulnerable to unrealistic beauty standards, leading to dissatisfaction with their own appearance. This can result in low self-esteem, body dissatisfaction, and disordered eating.[60] However, this concern exists for non-social media publications and broadcasting too. It's an example of online harms simply mirroring harms in society.

Cyberbullying

50. Mokopuna, particularly mokopuna Māori, Pacific and rainbow mokopuna, are concerned about the issue of cyberbullying.[61, 62] The anonymity and accessibility of social media often creates an environment where cyberbullying can thrive. Cyberbullying can cause feelings of isolation, depression, and anxiety, and in extreme cases, may lead to self-harm or suicidal thoughts or worse.[63]

> 66 "I see my friends and strangers in this country being bullied on social media or sharing hate towards another kiwi. Private

---

[56] Koi-Tu-Literature-Review-for-Te-Hiringa-Mahara-May-2023.pdf
[57] Young People's Voices on Mental Health and Wellbeing in Aotearoa New Zealand 2024
[58] Social Media Has Both Positive and Negative Impacts on Children and Adolescents - Social Media and Youth Mental Health - NCBI Bookshelf
[59] Digital Reflections: The Online Experience and its Influence on Youth Body Image in Aotearoa | Classification Office
[60] Ibid.
[61] Koi-Tu-Literature-Review-for-Te-Hiringa-Mahara-May-2023.pdf
[62] https://sites.massey.ac.nz/teaurangahau/wp-content/uploads/sites/53/2021/09/Houkamau-et-al-2021.pdf
[63] The Cyberbullying Experiences Survey with New Zealand Psychology 2018

information and images being shared for the world to see. Kids are seeing inappropriate stuff on the internet at a younger age. Minors are being contacted by creeps with bad intentions. People are having their social medias hacked and information shared."

(Young person, State of the Generation Report, Youthline Auckland 2024)[64]

Impact on wellbeing and relationships

51. Overusing social media can lead to changes to daily behaviour and the physical, cognitive, and psychosocial wellbeing of mokopuna. As a result, young people may feel irritable and have difficulty focusing or concentrating in school or at home.[65] Social and family interactions can also be affected, as young people become more absorbed in their online lives and less engaged with those around them. These changes can negatively impact relationships and overall holistic wellbeing.[66]

Personal data and digital footprint

52. Social media platforms often collect vast amounts of personal data from young users, which can be exploited or misused. Mokopuna do not always understand the implications of sharing personal information online, leaving them vulnerable to privacy breaches, identity theft, hacking or unwanted exposure.[67] Additionally, many platforms may target young users with harmful algorithms, ads and/or manipulate their data in ways that exploit them as consumers, or compromise their privacy, potentially leading to long-term consequences for their digital footprint.

Exposure to harmful content

53. Mokopuna are also concerned about exposure to inappropriate and harmful online content, as well as interactions with strangers online.[68] We acknowledge the Government's efforts to regulate online spaces, however, mokopuna can still encounter harmful or inappropriate content, such as violence, explicit material, or extreme ideologies. Exposure to such content can negatively impact their mental development and worldview, leaving lasting traumatic effects.[69]

Children's rights considerations for mokopuna belonging to indigenous and/or minority groups

54. The following section discusses some of the children's rights considerations for mokopuna Māori, and mokopuna belonging to indigenous and/or minority groups, with a focus on challenges that they are experiencing to their rights in the digital world.

---

[64] State of the Generation, Youthline Auckland 2024.
[65] Impact of Digital Technologies on Health and Wellbeing of Children and Adolescents: A Narrative Review 2024
[66] https://informedfutures.org/wp-content/uploads/pdf/Koi-Tu-for-Te-Hiringa-Mahara-Literature-summary.pdf
[67] Youth Digital Wellbeing Research Report 2024 - v1.0
[68] Ibid
[69] Ibid

Mokopuna Māori

55. Mokopuna Māori have shared that the negative impacts of social media include the perpetuation of negative stereotypes and racism.[70] Mokopuna Māori relate these experiences with anxiety, anger, and a diminished sense of health and wellbeing due to cyberbullying, targeted racism and the way the media sometimes perpetuates the portrayal of harmful negative stereotypes.[71] This can lead to mokopuna Māori feeling excluded, unfairly treated, and disrespected.

Pacific mokopuna

56. A recent literature review examining the impacts of social media on Pacific youth in Aotearoa New Zealand reveals that, compared to peers from other ethnic groups, Pacific mokopuna are more susceptible to cyberbullying, online exclusion, unsolicited requests for sexually explicit material, non-consensual sharing of personal information, accidental exposure to distressing content, and unintentional downloading of malware. It also raises that social media offers benefits such as opportunities to challenge media bias and maintain international connections.[72]

Mokopuna whaikaha

57. An Aotearoa New Zealand based research paper has highlighted that mokopuna whaikaha experience several negative impacts of social media, including social exclusion, exposure to harmful content, cyberbullying, and pressure to conform to social norms.[73] Many disabled young people face online isolation and are more vulnerable to digital abuse.[74] They are also more likely to encounter distressing material, including content promoting self-harm.[75] Additionally, social media can also increase feelings of inadequacy due to societal beauty or behavioural standards that are posted online.[76] While social media often provides support and connection for mokopuna whaikaha, the challenges faced by mokopuna whaikaha must be addressed to create a safer and more inclusive online environment for and with them.[77]

Rainbow mokopuna

58. The Youth Wellbeing Insights Report published by Te Hiringa Mahara Mental Health and Wellbeing Commission highlights several negative impacts of social media for rainbow mokopuna.[78] Many rainbow mokopuna report experiencing cyberbullying, discrimination, and harassment, which can have serious effects on their mental health.[79] Rainbow mokopuna do not consistently feel safe on social media platforms to be their

---

[70] Kora, Aorangi (2023), Te Ara Matihiko: Exploring affirmative social media use among rangatahi Māori

[71] Cyberbullying Toward Māori Is Rife in New Zealand: Incidences and Demographic Differences in Experiences of Cyberbullying Among Māori

[72] The impacts of social media on the wellbeing of Pacific youth in New Zealand 2024

[73] The Digital Age: Youth, Disability, and Mental Health

[74] New Zealand Teens and Digital Harm - Statistical insights into experiences, impact and response

[75] The Digital Age: Youth, Disability, and Mental Health

[76] Ibid

[77] Ibid

[78] Youth Wellbeing Insights Report | Te Hiringa Mahara—Mental Health and Wellbeing Commission

[79] https://insideout.org.nz/wp-content/uploads/2024/04/Ending-rainbow-focused-bullying-and-discrimination-resource.pdf

authentic selves. This has often led them to self-censor, not participate in public conversation, or keep their social media accounts private.[80]

59. However, social media can also foster positive connections for rainbow mokopuna, offering social support and resilience, whilst also posing risks, such as heightened loneliness, mental distress, and exposure to online-victimisation or harmful behaviours.[81] While social media provides a sense of community, belonging and spaces for identity-building, exploration and learning for many rainbow mokopuna, it also presents significant risks related to online safety and mental wellbeing, making it important to create safer and more inclusive online spaces.[82]

Muslim mokopuna

60. There is large concern about how social media enables the perpetuation of extremism, hate and racism, which can lead to extreme violence – like the 15th of March 2019 Christchurch Mosque attacks which killed 50 people and left another 50 people injured.[83] A survey by NetSafe in 2019 found that in the context of religious affiliation, the highest rate of exposure to online hate speech was reported by Muslim participants at 67%.[84] Muslim mokopuna are concerned about perceptions and portrayals of Muslim culture online and in the media.[85] However, Australian research has highlighted that Muslim youth have found opportunities to take civic engagement and collective agency on social media and online platforms.[86]

Care-experienced mokopuna

61. Overall, there is limited research on the impacts of social media on care-experienced mokopuna. Mana Mokopuna is concerned that, due to this lack of evidence, care-experienced mokopuna may not be given the same consideration as other groups of mokopuna.

62. One source of care-experienced mokopuna perspective in relation to this issue is found in the Youth Wellbeing Insights report by Te Hiringa Mahara, despite it being limited in sample. In this report, care-experienced mokopuna shared that sometimes, social media adds another level to the experience of bullying. One care-experienced mokopuna shared that social media platforms must have policies to support young people to be safe online.[87] They also highlighted that social media providers must follow their policies and ensure that they respond to complaints or reports of harm.[88]

Intersectional children's rights challenges

63. The digital environment can have a negative compounding impact without adequate safeguards in place. Intersectional research in Aotearoa New Zealand has found a

[80] Queer+experiences+NZ+final+report+Dec+2023+Kayli+Taylor.pdf
[81] JMIR Mental Health - Young Sexual Minority Adolescent Experiences of Self-expression and Isolation on Social Media: Cross-sectional Survey Study
[82] Journal of Medical Internet Research - Social Media Use and Health and Well-being of Lesbian, Gay, Bisexual, Transgender, and Queer Youth: Systematic Review
[83] Terrorism, trauma, tolerance: Bearing witness to white supremacist attack on Muslims in Christchurch
[84] Measuring trends in online hate speech victimisation and exposure, and attitudes in New Zealand
[85] A critical narrative review of research about the experiences of being Muslim in New Zealand
[86] Religion, belonging, and active citizenship: A systematic review of literature on Muslim youth in Australia
[87] Youth Wellbeing Insights Report | Te Hiringa Mahara—Mental Health and Wellbeing Commission
[88] Ibid

pervasive pattern of inequity for young people who have intersectional identities compared to those from the majority groups (i.e. Pākehā, non-disabled, cis-heterosexual youth). Mokopuna with intersecting identities have emphasised that they feel a lack of understanding and support for their identities, and they are also concerned for the mental health of their peers due to Aotearoa New Zealand's high rates of youth suicide.[89] It is important that we approach such issues with an intersectional lens - for example, for mokopuna that belong to both the Pacific and Rainbow community, Moana Wā offers a safe online space through social platforms to navigate intersectional issues that impact them, such as white supremacy, racism and stereotyping.[90]

Solutions - safeguarding mokopuna in the digital world

> "We need to teach our young people how to have that critical lens early on. Teach young people to weigh up information and its validity. That's not a skill that's necessarily taught. There's a lot of misinformation out there that could be really damaging."
>
> (Whāraurau Youth Advisors, Young people speak out about Wellbeing. 2022)

64. Mokopuna hold valuable insights into the challenges and harms they experience online. Their participation in decision-making processes is essential to ensure that policies, laws, and digital tools are designed to meet their needs and protect their rights. Engaging mokopuna in decisions about online safety, platform regulations, and digital content allows for solutions that reflect their lived experiences.

65. As the independent advocate for mokopuna in Aotearoa New Zealand, we strongly advocate for mokopuna views on the digital world and social media to be proactively and intentionally sought out to inform any policy or legislative approaches in this area, and for their views to be listened to and meaningfully taken into account to shape any change. We strongly advocate for tech companies, including social media platforms, to take this approach too.

66. Mokopuna have also shared that it is important to recognise the positive impacts of social media in their lives, and they have identified many solutions to address its negative impacts. These include increasing education on the harms and dangers of being online, and to ensure mokopuna and parents, caregivers and whānau are well-equipped with up-to-date digital literacy in an ongoing way, so they can safely navigate the online world.[91, 92]

The role of mokopuna

67. For policies and regulations to be truly effective in preventing and responding to online harm, they must be created with mokopuna. Solutions that come from the direct

---

[89] Negotiating mulfiple idenfifies: Intersecfing idenfifies among Māori, Pacific, Rainbow and Disabled young people

[90] Dr MahMah Tohoa Lita Tetini Timoteo, Kotahitanga: Weaving Intersectionality in Youth Work, pg.12 Kaiparahuarahi-Ed-2-Vol.-3_Part-2.pdf

[91] Youth-Wellbeing-Insights-Report-Full.pdf (mhwc.govt.nz)

[92] STC-NetSafe-Online-Safety-Report-2025.pdf

experiences and ideas of mokopuna are more likely to be effective because they are informed by their realities and lived experience.

68. Mokopuna have shared that educational initiatives can be an effective way to address online harms. Many young people advocate for creating more accessible spaces to learn about online safety, where mokopuna can support one another in identifying and managing harmful content.[93] It is important to empower young people to feel more confident in navigating the online world while fostering a sense of community responsibility.

69. There are many reports where mokopuna have highlighted the need for more robust content moderation on social media platforms.[94] Young people have suggested that platforms should implement better tools to detect harmful content, and ensure that harmful content or comments are removed promptly. They have also recommended clearer and responsive reporting systems that allow users to report abusive content without feeling overwhelmed or unsure about the process.[95]

70. Mokopuna have proposed the introduction of digital wellbeing programs and strategies that can help them manage screen time, set boundaries around social media use, and develop healthier relationships with the digital environment.[96]

71. Young people in Aotearoa New Zealand have also shared ideas on promoting positive content and online engagement. They have called for more platforms to support and showcase content that promotes mental health, positive body-image, and inclusivity.[97]

72. Mokopuna have also shared that they think their parents and caregivers do not hold enough knowledge about the digital environment and the impacts of social media. They have highlighted that there is a need for mutual understanding and collaboration between mokopuna and their parents.[98] Mokopuna have suggested that their parents should learn from mokopuna who are more informed and engaged in the digital environment, and that parents and caregivers should provide the support needed to avoid risks and encourage safe online habits.[99]

73. We strongly recommend that the Committee prioritises engaging explicitly with mokopuna to get insights specifically for this Inquiry and before any solutions are decided on.

74. Ongoing consultation with mokopuna ensures that their needs are met in a rapidly changing digital landscape. By maintaining ongoing mokopuna engagement – decision-makers, policymakers and social media companies can continue to adapt their platforms to keep pace with new challenges and emerging risks faced by mokopuna online, such as those generated by the rapid growth in AI, in order to uphold and protect children's rights and ensure online spaces are as safe as possible for mokopuna. By listening to

---

[93] The Significance of Digital Siblingship for Children Navigating Online Harms and in Accessing Justice | SpringerLink

[94] Te Hiringa Mahara the Mental Health and Wellbeing Commission (2022). *Young people speak out about Wellbeing* Youth-Wellbeing-Insights-Report-Full.pdf (mhwc.govt.nz)

[95] Is self-regulation failing children and young people? Assessing the use of alternative regulatory instruments in the area of social networks

[96] Youth Digital Wellbeing Research Report 2024 - v1.0

[97] New Body Image Report Highlights the Missing Voice of Youth | Classification Office

[98] Youth Digital Wellbeing Research Report 2024 - v1.0

[99] Ibid

their voices and acting on their solutions, we can ensure a digital environment where mokopuna are protected, empowered, and can thrive.

The role of Government

75. Under Article 4 of the Children's Convention, the Government has an obligation to establish legislative, policy, and regulatory settings that uphold the full range of rights for all mokopuna. This includes ensuring they grow up in an environment of happiness, love, and understanding—not only offline but also in the digital world. As the online environment increasingly shapes how mokopuna connect, learn, and play, policy responses must extend this duty into digital spaces to ensure mokopuna are nurtured and protected wherever they are.

76. General Comment No.25 emphasises the need to integrate children's rights into digital policy-making. It stresses the importance of ensuring that mokopuna are protected from online harm, have access to quality information, and can participate in decisions that impact them. This authoritative children's rights guidance emphasises the duty of States Parties to the Children's Convention to actively work towards a digital environment that is child-centred and promotes mokopuna rights, while seeking to eliminate and minimise the challenges to their rights and the inequities that mokopuna face online.[100]

77. The Government has a fundamental responsibility to ensure mokopuna can equally enjoy their rights in all settings, including online. This includes listening to mokopuna, upholding their right to be heard in matters that affect them, and ensuring their best interests are a primary consideration in digital policy and regulation. The state must also take all appropriate measures to support their survival, development, and wellbeing – ensuring digital environments contribute positively to their growth rather than exposing them to harm or exclusion.

78. As a States party to the Children's Convention, the Government has a duty to support parents and caregivers to respect the evolving capacities of mokopuna. They should also enable adults to learn about digital citizenship, to have strong digital literacy and to be equipped in recognising online risks, so they can protect children's rights, including their safety, in the digital environment.[101]

79. The Children's Convention reinforces the State's obligation to integrate mokopuna rights into policy-making, including regulation of businesses. This includes ensuring tech and social media companies respect and uphold children's rights, prevent online harm, and make digital platforms accessible and safe for mokopuna. Governments must actively regulate such businesses to ensure they align with children's rights and take steps to address inequities and risks that mokopuna may face online.

---

[100] General comment No. 25 (2021) on children's rights in relation to the digital environment
[101] General comment No. 25 (2019), page. 4, para. 19-29.

The role of business

> 66 "When I report a post that has me or someone I know in it, it never gets taken down and it always says that there is no reason the post or photo should be removed."
>
> (Mokopuna, Age 15-17, Internet Safety Survey, Save the Children and NetSafe 2025)[102]

80. Tech companies and social media platforms, as key players in the digital environment, hold significant responsibilities for upholding children's rights, as outlined in *General Comment No. 16 on State obligations regarding the impact of the business sector on children's rights*.[103] This guidance emphasises that businesses, including tech companies, must respect, protect, and uphold children's rights.[104] These businesses have a duty to create environments that are safe, inclusive, and conducive to children's holistic development. This responsibility extends to preventing online harm, ensuring privacy and data protections, and enabling mokopuna participation, play and development in a way that protects their rights without exploitation.

81. We recognise that despite children comprising one in three internet users, online spaces are predominantly designed for adults and often fail to meet the needs of mokopuna.[105] As a result, children encounter various inappropriate channels such as online gambling and contractual obligations, which poorly monitor appropriateness of content and age of users. Research has raised the challenge of ensuring age-appropriate and rights-respecting experiences in the digital world, given that it is not always clear who is a child.[106] This issue connects to General Comment No. 16, which emphasises the importance of creating environments that protect children's rights and respect their evolving capacities, including in the digital space.[107]

82. In the context of children's rights, businesses must prioritise protecting mokopuna from harmful content, exploitation and manipulation, giving effect to their rights under the Children's Convention.[108] Social media platforms must adopt proactive measures to ensure that their services do not conflict with children's rights to privacy, safety, education, and freedom of expression. This includes, but is not limited to, the design of child-friendly interfaces that protect mokopuna from harm, algorithms that are free from bias and manipulation, clear reporting mechanisms for harassment, bullying, and abuse, and appropriate responses to these reports in a timely manner.

83. The negative impacts of social media on children's rights are often exacerbated by things such as biased or addictive algorithms, poorly regulated environments, and inadequate reporting and response practices. Algorithms drive addictive and/or harmful content recommendations on platforms like YouTube, Instagram, and TikTok, which are

---

[102] Children's voices poll: internet safety — Save the Children NZ via Instagram

[103] General comment No. 16 (2013) on State obligations regarding the impact of the business sector on children's rights

[104] General comment No. 16 (2013) on State obligations regarding the impact of the business sector on children's rights

[105] One in three: Internet governance and children's rights

[106] Children's Rights and Online Age Assurance Systems in: The International Journal of Children's Rights Volume 32 Issue 3 (2024)

[107] General comment No. 16 (2013) on State obligations regarding the impact of the business sector on children's rights

[108] Children_s_rights_for_The_European_Review_LSERO_2.pdf

designed to maximise user engagement, often at the cost of mokopuna wellbeing and safety. These algorithms can expose mokopuna to significant harmful or inappropriate content, such as self-harm, sexual exploitation, and extremist material, and can seek to economically exploit children and young people.[109, 110] Because these platforms focus on engagement *over* safety, the algorithms often prioritise sensational, disturbing, or misleading content that may be detrimental to children's mental health or development, as well as marketing content aimed at particular ages of users.[111] This is, in large part, why greater New Zealand Government regulation and accountability of tech and social media companies and platforms is so urgent when it comes to upholding children's rights.

84. Moreover, social media sites often operate in unregulated environments where there is insufficient oversight or accountability for the content mokopuna are exposed to.[112] In these environments, harmful behaviours, such as online grooming, harassment, and the spread of disinformation and misinformation can proliferate.[113] This lack of regulation allows harmful content to go unnoticed, further endangering mokopuna and depriving them of a safe space to interact and connect online. Tech companies running social media platforms must take responsibility by implementing robust safeguards and monitoring systems to identify and remove harmful content in real-time, especially for young users.

85. Additionally, poor reporting and response practices exacerbate these issues. When children encounter harmful content or behaviour online – for example, racist content; pornography; violent content; extremist content – they may face significant barriers to reporting or receiving timely support.[114] Many social media platforms provide inadequate reporting and response mechanisms that fail to address incidents effectively. These issues are compounded by inconsistent enforcement of community guidelines, with harmful content or abusive behaviour often left unchecked, which undermines children's rights to protection and redress.[115] Platforms need to offer: clear, accessible, and effective reporting systems that allow children to flag harmful content, ensuring that all complaints are adequately addressed and acted on; response protocols that prioritise the rights and best interests of child consumers rather than the risks and profits of the business; and that clear explanations are made if a decision does not meet the expectations of the complainant.

> "Social media [providers] will remove some things but you can report someone being racist or threatening people and it just says, there is no issue here and then just leaves it… [Companies] say 'we do not allow bullying, we do not allow this, but they do.

[109] Cybersmarties, Pathway to a Safe Digital Future: Empowering Children for positive online experiences, 2024
[110] Netsafe. (2018). New Zealand teens and digital harm: Statistical insights into experiences, impact and response.
[111] Ananta Pathak (2021), Dissecting Social Media and TikTok for Children and Young Adults
[112] Impact_of_regulation_on_children_DFC_Research_report_May_2024.pdf
[113] New Zealand Children's Experiences of Online Risks and Their Perceptions of Harm. Evidence From Ngā Taiohi Matihiko O Aotearoa – New Zealand Kids Online
[114] Is self-regulation failing children and young people? Assessing the use of alternative regulatory instruments in the area of social networks
[115] Final-Hidden-Hate-Report-250227.pdf

> And if they're going to put that this is our policy, they need to follow through with their policy."
>
> (VOYCE Whakarongo Mai, Young people speak out about Wellbeing. 2022)[116]

86. Social media companies have a critical role in upholding children's rights by ensuring that their platforms are safe, accountable, and supportive of children's holistic development. By addressing the negative impacts of things such as algorithms, unregulated environments, and poor reporting practices, platforms can better protect children from harm and foster a digital space where children's rights are respected, protected and promoted. Business practices must evolve to prioritise the wellbeing of mokopuna, ensuring that platforms serve not just as spaces for social interaction but as safe environments where children can learn, grow, play and express themselves freely.

The role of society - evolving capacities and the importance of parental education and support

87. A children's rights approach endorses the evolving capacities of each and every mokopuna, this means that as a mokopuna gets older, they acquire enhanced competencies, abilities and understanding so mokopuna are able to make more informed decisions and exercise their rights with increasing autonomy.[117]

88. Evolving capacity is particularly significant in the digital environment and supports mokopuna to engage more independently online as they develop. The risks and opportunities associated with children's engagement online change, depending on their age and stage of development. Therefore, supervision from parents, caregivers and adults is important for younger mokopuna.[118]

89. The concept of evolving capacities is important for younger mokopuna, as screen time and exposure to digital technology and the online world can have greater negative impacts on their health and wellbeing due to their greater susceptibility. For example, research has examined the risks and benefits of screen time for mokopuna under five, with a focus on the impacts on development. It highlights that excessive screen time can hinder language acquisition, cognitive growth, and social-emotional development, while also affecting sleep and physical activity[119]. The screen habits of young mokopuna are often shaped by their parents, making it crucial for parents to be aware of screen time guidelines and set appropriate limits. Quality content, co-viewed with parents, can offer developmental benefits, such as supporting language learning and cognitive skills, but it is most effective when balanced with live, interactive experiences.[120, 121]

---

[116] Te Hiringa Mahara the Mental Health and Wellbeing Commission (2022). Youth-Wellbeing-Insights-Report-Full.pdf (mhwc.govt.nz)

[117] Evolving capacities of the child and the role of parents - Childrens Rights Reform

[118] General comment No. 25 (2019), page. 4, para. 19-29.

[119] Evolving capacities of the child and the role of parents - Childrens Rights Reform

[120] Ponti,M. (2022). Screen time and preschool children: Promoting health and development in a digital world.

[121] Nakshine, Vaishnavi S., et al. "Increased screen time as a cause of declining physical, psychological health, and sleep patterns: a literary review."

90. There are also increasing risks concerning data collection, where personal information belonging to mokopuna is constantly collected and analysed, often without their full understanding or consent. This raises significant concerns about mokopuna privacy rights, particularly in light of their evolving capacities. Parents play a crucial role in protecting mokopuna privacy, and it is important that they are informed about the risks of data exploitation and are equipped with the knowledge to navigate the digital environment safely. There must be a balance in respecting the evolving autonomy of mokopuna and providing adequate protection, and parents must be supported to guide younger mokopuna through the complexities of the digital landscape.

Conclusion and recommendations

91. Mokopuna are growing up in a world that offers opportunity, connection, and creativity through digital spaces. However, these spaces also are home to real risks to their wellbeing, rights, and development. Mana Mokopuna advocates for policies and approaches that are systemic and take into consideration the holistic nature of mokopuna lives and their rights. Keeping the online world safe for mokopuna requires a proactive, rights-based approach that centres their voices, recognises their evolving capacities, and upholds their rights to thrive in safe and supportive digital environments.

92. The negative impacts highlighted in this submission, underscore the importance of increasing education about the digital environment for both mokopuna and adults and providing mokopuna with the tools to navigate online spaces in a balanced and supportive way. Mokopuna also want proactive parental involvement to help them navigate the digital environment safely, monitor online risks and set limits on screen time and app usage.[122, 123]

93. Giving effect to children's rights in the digital world and preventing online harm for our youngest generations is a shared responsibility. It requires collective commitment from government, business, parents, whānau and mokopuna themselves to ensure all mokopuna can be safe, informed, and empowered to flourish online – now and into the future.

94. Mana Mokopuna recommends that:

   a. Mokopuna are consulted and regarded as active participants in the digital world, and their views and ideas are central to and meaningfully considered in developing solutions to online harm, including before any steps are taken to restrict social media access for children and young people.

   b. Ongoing work is undertaken to monitor how the digital world affects mokopuna and, given its rapid and widespread evolution, to proactively develop, update, and implement online safety measures in Aotearoa New Zealand.

---

[122] Ibid
[123] Blackdog Institute. Adolescent screen use and mental health Summary of findings from the Future Proofing Study July 2024

c. Solutions and responses to online harm prioritise education and support that equips mokopuna to navigate the digital environment and social media safely, alongside up-to-date guidance for adults to support them in these spaces.

d. The Government more strongly focuses on regulating digital and tech companies, including social media platforms, with a specific focus on regulating to prevent harm for mokopuna online and holding these companies and platforms accountable for harm to mokopuna.

e. The Government requires that mokopuna and their rights are proactively put at the centre of the development of policy and governance relating to AI, recognising that children's lives are already being impacted by AI, and that mokopuna should be actively engaged in work to share their views on AI and how they want to see it developed and governed.

Appendix One - Centring children's rights in the digital environment

66

"Less harmful or mean content. More privacy and control over what I share. More education for parents and teachers about what it's like to be online as a young person. Safer online gaming spaces."

(Mokopuna, Age 12-14, Internet Safety Survey, Save the Children and Netsafe, 2025)[124]

95. Guidance from the UN Committee on the Rights of the Child notes that technology is vital to the lives and futures of mokopuna.[125] The UN Committee highlights the importance of the digital environment, including during times of crisis and for education, and they also advise that there is an increased opportunity for the realisation of children's rights alongside the risks of digital violation or abuse.[126]

96. The rights of all mokopuna must be respected, protected, and fulfilled in the digital environment. Advances in digital technologies impact children's lives and their rights in extensive and interconnected ways. Meaningful access to digital technologies can help children realise the full scope of their civil, political, cultural, economic, and social rights.[127] We emphasise the following children's rights and guidance to the Petitions Committee[128]:

Article 2 – Right to non-discrimination

Children have the right to non-discrimination, including not experiencing racism, discrimination, or hateful communications online and through equitable access to the digital environment. Therefore, social media sites must ensure that algorithms and automated processes do not discriminate against different groups of mokopuna and that when instances of discrimination occur online, that there are safe and responsive complaints and reporting mechanisms available.

Article 6 – Right to life, survival and development

Children have the right to life, survival and development and the State has a responsibility to ensure the maximum possible development of each and every mokopuna. There are links between social media use and increased mental distress, suicidality and other risks to mokopuna safety and wellbeing – such risks must be addressed and considered in the diverse contexts that mokopuna live in. It is also important to consider this right for mokopuna in the earliest years of life, when their development of cognitive, emotional and social skills is rapidly growing, and their brain plasticity is maximal. In the early years, precautions may be required, depending on the

---

[124] Children's voices poll: internet safety — Save the Children NZ via Instagram
[125] General comment No. 25 (2021) on children's rights in relation to the digital environment
[126] Ibid, pg.1, para 3.
[127] Ibid
[128] Ibid

design, purpose and uses of technologies, especially during the critical neurological growth spurts of early childhood and adolescence.[129]

Article 8 – Right to Identity

Children have the right to the preservation of identity, and this encompasses the experience of belonging and identity-shaping that mokopuna can benefit from in the digital environment. For example, digital forms of culture, recreation and play should support and benefit mokopuna and reflect and promote their cultural identities, languages and heritage. The digital environment can also facilitate children's social skills, learning, expression, creative activities, and a shared online culture. This also relates to the right to privacy and protecting identity data through secure digital systems, strict regulatory standards, and support for parents, whānau and communities regarding sharing mokopuna information and photos online.

Article 12 – Right to Participation

Children have the right to freely express their views on matters affecting them, including in the digital environment. In the development of solutions focused on social media educational and safety mechanisms, mokopuna must be meaningfully involved to ensure that their perspectives and needs are addressed. This will ensure that such policies are shaped in a way that reflects their realities, giving them a voice in creating solutions to address the impacts of social media.

Article 15 – Freedom of Association and Peaceful Assembly

Children have the right to associate freely and engage in peaceful assemblies, including in the digital environment. This encompasses their ability to join online communities, engage in digital activism, and express themselves freely. In the digital environment and on social media, mokopuna should have the freedom to engage in online discourse and collaborate with their peers in a safe and protected space.

Article 16 – Right to Privacy

Children have the right to privacy, including protection from any unlawful interference in their digital lives. Children's personal data must be safeguarded, and their privacy must be respected, ensuring they are protected from unauthorised access, exploitation, or misuse of their personal information by digital platforms, online actors and Artificial Intelligence.

Article 17 – Right to Access Information

Children have the right to access information that is important for their development. Digital platforms are often a place where mokopuna go to access this information, and it is important that it is age-appropriate, dependable, and supports their learning, wellbeing, and growth. This right ensures that mokopuna are free to access diverse, accurate, and enriching content online to enhance their development. This right is particularly important given the proliferation of disinformation, misinformation and Artificial Intelligence in the digital world.

Articles 28 & 29 – Right to Education

---

[129] General comment No. 25 (2019), para. 22; and general comment No. 20 (2016), paras. 9–11.

Children have the right to quality education, and the digital environment can play a key role in facilitating this right. Digital tools and platforms should be designed to enhance educational opportunities, providing equal access to learning resources for all children. Online education must be accessible, inclusive, and aligned with a child's holistic development. Education focused on online safety and digital citizenship, such as the RSE Guidelines, must ensure that mokopuna have a voice in their education, with opportunities to develop their personality, talents, and mental and physical abilities to their fullest potential. This includes providing a curriculum and guidelines that support their growth in all areas, including all four dimensions of Te Whare Tapa Whā. RSE Guidelines play a crucial role in this by helping mokopuna navigate online safety, the complexities of their developing identities and fostering positive, healthy connections (both in-person and online) that contribute to their overall development.

Article 31 – Right to Culture, Leisure and Play

Children have the right to culture, leisure, and play, which includes digital play and leisure. Social media also provides mokopuna with a platform to explore and express their cultural identities. For example, for mokopuna Māori this includes through online engagement based in Te Reo Māori (such as learning and sharing of language), tikanga Māori, and other cultural practices. The digital environment should provide safe, creative, and age-appropriate avenues for all mokopuna to play, socialise, and express themselves, fostering healthy engagement and positive development through digital play and creative platforms.

Article 32 – Right to protection against economic exploitation

Children have the right to be protected from economic exploitation and harmful work, including ensuring that mokopuna are not forced to work in ways that interfere with their education or development. In the context of the digital environment, this right is highly relevant as children are increasingly exposed to risks like online marketing, data profiling, and digital child labour.[130] It is important that mokopuna are not targets of manipulative commercial practices, such as being nudged to spend money in apps or share personal data. To address these risks, the digital environment must implement safeguards to protect children from economic exploitation. Parents, policy makers, and tech companies must regulate and uphold these protections.

97. As the New Zealand Government has endorsed the Pact for the Future and the Declaration for Future Generations, we advocate for the Government to take practical actions to deliver on these commitments to children and future generations. Alongside this we advocate for the Government to implement the objectives and recommendations set out in the Global Digital Compact. These recommendations are grounded in a human rights framework and support the achievement of the UN's Sustainable Development Goals and will, therefore, support the realisation of mokopuna rights in the digital environment.[131]

---

[130] The child's right to protection against economic exploitation in the digital world
[131] Pact for the Future, Global Digital Compact and Declaration on Future Generations

98. The Children's Convention encompasses **Special Protection Measures,**[132] and we encourage the Committee to consider the impact of the digital environment and social media for children belonging to minority or indigenous groups. It is important to consider the inequitable and intersectional concerns as these mokopuna are likely to experience heightened challenges and risk of harm online.[133]

---

[132] Special protection measures - Children's Convention from the United Nations - Ministry of Social Development
[133] youth19-intersectionality-report-final.pdf