



GENERAL ELECTION MANIFESTO 2024

**Five commitments  
that will transform  
children's online safety  
and well-being**



# Introduction

In the six years since my youngest daughter Molly died, it's striking how little has changed.

Children and young adults continue to face a wave of inherently preventable online harms on often negligent social media and gaming platforms. Online platforms have prioritised profits and market share over the safety and well-being of young people.



It is therefore no surprise that there is a considerable groundswell in demands for further action.

In this election, political parties must respond to this urgent challenge – and act decisively but responsibly.

In this manifesto, Molly Rose Foundation sets out five bold policies that can have a transformational impact on children's online safety and well-being. Put simply, regulation can work – recent research has shown over 100 product changes have been made by platforms in response to UK regulation safety.<sup>1</sup>

Now we need to go further to build on these foundations and keep pace with the tech powerhouses. The next Government must commit to a new Online Safety Act that strengthens regulation, and that makes clear that the cost of entry to the UK market is children and young people's safety. Nothing less than a fundamental reset of the relationship between tech companies and their child users is enough.

But politicians must also act responsibly. This increasingly feels like a major inflection point in how we respond to online safety: we can either double down on evidence-based, expert approaches, or take a different course and pursue social media and device bans that penalise young people for Big Tech's failures. The available evidence says that bans and similar restrictions lead to worse, not better, child safety outcomes.

We owe our children nothing less than decisive action that protects them from online harms. Whoever becomes Prime Minister on July 5th must prioritise the safety of our children and ensure that no more families are left to live the rest of their lives mourning the loss of a child taken before their time.

**Ian Russell,**  
**Chair of Trustees, Molly Rose Foundation**

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<sup>1</sup> Children and Screens (2024) UK Age-Appropriate Design Code Impact Assessment. See also Wood, S (2024) Impact of regulation on children's digital lives. Digital Futures Commission

# 5 commitments to transform children's online safety and well-being

Molly Rose Foundation is calling for the next Government to commit to five transformative policies that, taken together, would decisively protect young people from preventable harm and bring about a step change in their online safety and well-being.

We are calling on the next Government to:

- 1** Introduce a new Online Safety Act to strengthen regulatory protections and focus the regime on achieving measurable harm reduction.
- 2** Take bold moves to ensure transparency and accountability from Big Tech, including a new duty of regulatory candour, and new measures to make companies report on user exposure to online harms in their corporate accounts.
- 3** Make the polluter pay, with a one-off harm reduction windfall tax that ensures tech companies no longer profit from harm while passing on the costs of their business model to children, families and society.
- 4** Commit to a new statutory Code for app stores and operating systems, ensuring that more of the tech ecosystem has legal responsibilities to protect children and support parents.
- 5** Invest in mental health support and prevention schemes to ensure children and young adults get the support they need to address the risks and impacts of technology-facilitated harm.

Political parties must commit to urgent and comprehensive action to protect children from preventable online harms.

The right answer to a complex question is further strengthening online safety regulation, drawing on evidence-based and proven approaches, not phone or social media bans that risk a slew of unintended consequences and may cause more harm than good.

# 1

## Introduce a new Online Safety Act to strengthen regulatory protections and focus the regime on achieving measurable reductions in harm

Online safety regulation remains the most powerful vehicle to protect children from preventable harm. From spring 2025, tech companies will be subject to enforceable measures that can tackle the design features and commercial decisions that put children in harm's way.

Now we must go further.

In the next Parliament, there is a crucial opportunity to strengthen the Online Safety Act. It's time to ensure children and young adults get the protection they need from tech firms that too often choose to prioritise their own bottom line over the safety and well-being of children.

A new Online Safety Act is required, and it should:

- **Reassert an overarching Duty of Care:** under the current iteration of the Online Safety Act, tech companies benefit from a 'safe harbour' if they follow all recommended measures in Ofcom's codes of practice. However, there are distinct structural and evidential barriers that are likely to prevent the codes being as strong as are needed to disrupt the scale and complexity of many online harms. As it stands, some large companies could scale back their existing safety approaches and still claim compliance;
- **Anchor the regime around measurable harm reduction:** Ofcom should be subject to an overarching duty to deliver annual improvements in harm reduction for children and young adults, with a statutory obligation to draft codes and deliver regulation with a primary emphasis on achieving harm reduction;
- **Strengthen the response to suicide and self-harm:** Ofcom's hand should be strengthened to more readily act on the types of harmful content that Molly saw, and to address the risks from harmful challenges

and stunts. This can be achieved by giving the regulator powers to designate relevant content as Primary Priority Content. As it stands, we are concerned that platforms may contest regulatory requirements based on the current wording of the Act. A new Act should also make encouraging serious acts of self-harm a priority offence, ensuring parity with the offence of instructing and encouraging suicide.

- **Restrict end-to-end encryption on social media for under 18s:** end-to-end encryption sharply increases the risk profile, when embedded into the design of social media platforms, with malign actors able to exploit this feature to coerce children into acts of suicide, self-harm and child sexual abuse. In recent months, the FBI issued an unprecedented warning about the risks of organised groups using messaging and video platforms to target children for acts of self-harm and suicide.<sup>2</sup> For children and young people, the risks associated with end-to-end encryption on social media platforms far outweighs the potential benefits to them;
- **Re-establish an adult safety duty targeted around priority harms:** the user empowerment provisions in the Act should be strengthened to ensure young adults don't face a cliff-edge scenario when they turn 18. Specifically, young adults should be shielded from harmful suicide, self-harm and highly depressive content *by default*. The current Act implies the burden should be on users at risk of suicide and self-harm to take rational decisions in their own self-interest, but research demonstrates many of these vulnerable young adults may demonstrate poorer cognitive processing, emotional dysregulation and appraisal skills,<sup>3</sup> leaving them at high-risk of being exploited by social media design nudges and 'dark patterns.'<sup>4</sup>
- **Tackle the risks of generative AI:** a new Act should urgently bring standalone chatbots into scope of regulation, with a risk that children and young adults could readily receive actively harmful content and advice from AI-driven chatbots trained using high-risk models. Generative AI content is likely to increasingly fuel the ready availability and discoverability of high-risk, high harm content, and create a 'doom loop' in which training models are fed on increasingly more harmful interactions.

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2 Federal Bureau of Investigation (2023) Public Service Announcement: Violent Online Groups Extort Minors to Self-Harm and Produce a Child Sexual Abuse Material

3 Andover, M et al (2014) Expanding and Clarifying the Role of Emotion Regulation in Non-suicidal Self Injury. *Can J Psychiatry*, 59 (11): 569–575

4 Hilton, M (2023) Dark Patterns and User Mental Health: Identifying Theoretical Impact of Deceptive Design on Vulnerable Demographics. *Proceedings of the Human Factors and Ergonomics Society Annual Meeting*

# 2

## Require transparency, accountability and candour from Big Tech

For too long, tech companies have been able to operate under a cloak of opacity. This needs to change.

Big Tech claims that its services don't cause harm to children and young people, while its internal research states the opposite. Independent researchers are routinely denied access to Big Tech datasets, while bereaved parents are denied access to the answers about how their children came to harm.

It's time for a fundamental reset, with a new proactive 'duty of candour' on tech firms and a clear legal right for researchers and bereaved parents to get access to the data they require.

The next Government should:

- **Introduce a new proactive duty of candour:** it's time for a proactive duty of candour on tech companies, which can shift the power dynamic from regulators having to ask the right questions to companies and named bosses being liable if they fail to disclose to the regulator information that is material to the risk of reasonably foreseeable harm on their sites.

Similar provisions already exist in the financial services regime and have played a crucial role in delivering much needed change of corporate culture following the financial crash.<sup>5</sup> By shifting the onus on companies and tech bosses to require proactive disclosure, we can move towards a model where it is beholden on the platforms themselves – and their senior managers – to volunteer information and to raise a 'red flag' when things go wrong.<sup>6</sup>

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5 Principal 11 of the financial services regime requires regulated providers proactively disclose information to the regulator about which it could reasonably expect to be informed.

6 For example, financial services companies are required to make reporting disclosures under the anti-money laundering and financial services regimes, and camping firms must report breaches against self-exclusion protocols

- **Commit to mandatory data access for researchers and civil society:** we urgently need a statutory right for independent researchers to access Big Tech data sets, with academic and civil society researchers being legally able to request anonymised data that is necessary to better understand Big Tech’s design choices, and that in turn are needed to demonstrate the causal mechanics of technology-facilitated harm.<sup>7</sup>
- **Establish new accountancy standards that require tech firms report in their corporate accounts on their users’ exposure to online harms:** as a standard part of their financial reporting requirements, technology companies regulated under the Online Safety Act should be made to report on users’ exposure to online harms when using their services. This is broadly analogous to the incoming requirements on corporate entities to report on their exposure to climate-related risks, agreed and now being implemented by G20 members. As well as taking a head start on these new accountancy measures, the UK should push for a new global standard to be agreed through its input into the G7.
- **Give bereaved parents access improved data rights:** given the Data Protection and Digital Information Bill didn’t reach the statute book before the 2024 election, hard-fought for rights for bereaved parents to access their data have not yet made it into law. The next Parliament should reinstate and pass these measures as a matter of urgency, and parties should explore how these measures can better serve the needs of parents who might still find themselves unable to get answers to the questions they need after a tragedy.<sup>8</sup>

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7 Such measures have been included in the EU’s Digital Services Act

8 For example, the case of Ellen Roome, who wants access to the social media accounts used by her 14-year old son Jools prior to his death

# 3

## Adopt a ‘polluter pays’ approach to cleaning-up the costs of online harm

For too long, platforms have been able to prioritise their revenue and user engagement over the safety and well-being of users. Tech firms have racked up record profits by being able to externalize the costs of harm to children, families and society.

The cost of technology-facilitated suicide and self-harm is staggering. Suicide-related Internet use has been reported in almost one-quarter (24%) of youth deaths by suicide,<sup>9</sup> resulting in a social and economic cost of £486 million per year.<sup>10</sup> Each year we see over 8,000 technology-related self-harm hospitalizations among young people aged 10–19.<sup>11</sup>

These costs are borne by children and families, law enforcement and the NHS. It’s therefore time to change the unjust business model of Big Tech – and to ensure that the ‘polluter pays’ principle is applied, with tech companies making a financial contribution to help clean up the preventable harms they cause.

The next government should:

- **Introduce a one-off harm reduction windfall tax:** a one-off harm reduction windfall tax, levied on platforms that have earned UK revenue through the algorithmic recommendation of primary priority and priority content, can be used to fund a significant uplift in tech accountability research and advocacy. By catalysing the available evidence base, this will also enable the regulator to act much more decisively on the causes of online harm.

Proceeds from the levy could support a transformative investment in prevention and education programmes, and directly support a range of frontline services that provide direct support to young people affected

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9 Rodway, C et al (2022) Online harms? Suicide related online experience: a UK wide case series study of young people who died by suicide. *Psychological Medicine*, 53 (10), pp1–12

10 Molly Rose Foundation analysis of Rodway’s data of deaths by suicide among young people aged 10–19, and using J-value calculations that set the value of a preventable fatality at £11.3 million in 2024 prices.

11 Figure calculated by using NHS England data for the number of self-harm hospital admissions among people aged 10–19 in 2021/22 and using previous modelling that 26 per cent of child hospitalisations display relevant internet usage.



by online harms. The levy could also directly support neighbourhood mental health, wellbeing and school-based digital literacy initiatives, at a time when the costs associated with poor mental health, and technology facilitated suicidality and self-harm behaviours, are placing significant strain on CAMHS, and having a deeply adverse set of effects on the health, wellbeing and life-chances of young people.

- **Extend the levy to support civil society and independent research:** an extension of the industry levy that funds Ofcom would be relatively modest in financial terms, but would provide a substantive resource boost to civil society and child safety groups – and enable them to meet the challenge of contributing evidence and insight to support good regulatory outcomes.
- **Invest regulatory fines back into prevention:** as it stands, enforcement penalties levied by Ofcom must be returned to the Exchequer. We encourage Parliament to amend the Online Safety Act to ensure a ‘polluter pays’ principle is applied instead – with fines returned directed into frontline prevention and support initiatives.

# 4

## Commit to a new statutory Code for app stores and operating systems

While the Online Safety Act currently regulates user to user communication and commercial pornographic services, there is a compelling argument to extend regulation to more of the tech ecosystem.

A statutory code for app stores and device operating systems would provide an additional top layer of protection.

At a time of heightened parental concern about the risks posed by online services, a statutory Code could offer new routes to protect children from age inappropriate and harmful content, for example through setting requirements for device-level age- assurance checks and minimum design standards for parental controls.

The next Government should:

- **Extend regulation to cover app stores:** as it stands, the Online Safety Act requires Ofcom to undertake research on the role of app stores in allowing children to access harmful content, with a planned review of the scope of regulation no earlier than two years after the regime takes effect. This is insufficient. App stores already play an important although largely opaque role in delivering online safety objectives, and there can be little doubt about the value of bringing the two dominant players – Apple and Google – into regulatory scope sooner.
- **Commit to a statutory Code for app stores and device operating systems:** a statutory Code of Practice should Apple and Google to introduce an age rating system that's fit for purpose; and develop highly effective device-level age assurance checks that can complement the checks being required of platforms.

A Code should also require the integration of high-quality parental controls that must meet specified minimum design standards. At present, take-up of parental controls is low, their effectiveness is inconsistent, and research suggests that overly intrusive parental controls deliver significantly worse safety outcomes. A statutory code would provide parents with the practical guardrails they are urgently seeking – and demonstrate to them that swift, decisive and well-evidenced measures are on the way.

# 5

## Invest in education, prevention and community mental health support

Addressing the risks and impacts of technology facilitated harm requires a ‘whole system’ approach, including investment in prevention and education.

To protect young people from the negative effects of harmful content we need to strengthen RSE and bring suicide prevention into the curriculum. Young people need the practical skills to be able to navigate the online world safely – but also improved access to support and mental health services, in school and communities, when they experience negative online experiences and experience physical and mental harm.

The next government should:

- **Put suicide prevention onto the curriculum:** suicide prevention must be added to the RSE curriculum, with funding available to support training, expert materials and age-appropriate lesson plans. We encourage the next Government to press ahead with the inclusion of suicide prevention in the statutory guidance for RSHE, and to ensure this is taught in the context of the risks posed by the algorithmic recommendation of suicide and self-harm content.
- **Invest in RSE and digital literacy initiatives:** critical literacy and online safety skills are vital to protect children’s well-being, and to enable them to deliver on their long-term potential. With only half of children feeling teachers have enough knowledge and confidence to teach RSE effectively,<sup>12</sup> and teachers themselves feeling ill-equipped to support their students in navigating online harms, investment in teacher training and material is crucial.
- **Invest in frontline prevention and support:** investment in children’s mental health is vital, with an urgent need to invest in school and community-based support. With demand for specialist mental health support rising at a faster demand than Child and Adolescent Mental Health Services (CAMHS) can keep up with, the next government should prioritise the rollout of ‘whole school’ prevention approaches:

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12 Sex Education Forum (2023) Young People’s RSE Poll 2022

this includes the expansion of Mental Health Support Teams,<sup>13</sup> a commitment to introduce a trained mental health counsellor into every secondary school, and the rollout of positive mental health techniques such as mindfulness.<sup>14</sup>

- **Introduce a new Innovation fund to support new community approaches:** a new innovation fund can support pilots of small-scale and community-based initiatives, for example the rollout of mental health hubs and civil society initiatives to bring mental health and well-being initiatives into community hubs and High Streets.

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13 Barnardos research found that 68% of children and young people receiving individual support from an MHST experienced a significant improvement in their mental health symptoms, and found a cost benefit of £1.94 every 1 pound invested.

14 We strongly support the calls made by Esther Ghey to rollout mindfulness skills in schools.

# Bans on social media and smartphones will cause more harm than good

In recent months, there has been a groundswell of concern about online harms and calls from some parent groups for restrictions on social media and devices for under 16s.

While this concern is understandable, and underscores how much more needs to be done to protect children and respond to parental concern, there is a strong consensus among child safety groups that widespread device or social media bans would be counterproductive and cause more harm than good. A majority of UK adults agree with that position, with only one in three adults backing a ban.<sup>15</sup>

At the Molly Rose Foundation, we want regulation to succeed and firmly believe this will provide the quickest route to online safety. Getting to a place of safety as quickly and effectively as possible is our priority – which is why we think any proposed increase to the minimum age limit for social media or devices is the wrong answer to an important question. Here's why:

- **Social media bans penalise children for the failures of Big Tech:** children can benefit from safer social media as a space to socialise, learn and exercise their self-expression. Children should not be penalised for the failures of self-regulation, nor for the failure of successive governments to act sooner.
- **Restrictions are a blunt and disproportionate step:** with effective regulation in place, children can use online services to play, learn and socialise more safely. The Online Safety Act will introduce much needed protections, and with the first enforceable Codes due to take effect from next year, regulation remains the best route to protect children from harm – and preserve their positive uses of technology.
- **Risks will get displaced, not removed:** increasing the minimum age for social media will result in young people migrating to gaming platforms, tablets and internet-connected devices to stay in contact with their friends. Malign actors will migrate too. Many gaming platforms

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<sup>15</sup> Polling for The Mirror, conducted by Whitestone Insight on 15 and 16 May 2024. 60 per cent want to see measures on harmful content fast-tracked in months. The proposal to ban smartphones is not widely supported, with 43 per cent against and 36% in favour.

and ancillary services are already high risk for sexual abuse and harmful content, and the risk profile is likely to soar to potentially unmanageable levels on platforms that allow user to user communication.

- **Bans would be slower to implement and may actually make the problems worse:** Ofcom will start enforcing its child safety duties from early 2025 – if these measures will be superseded by bans, platforms will delay implementation and reasonably argue the costs of safety-by-design measures for u16s are no longer proportionate. The market for child safety solutions and much needed innovation will be reduced considerably, making compliance much more challenging for online platforms that do remain in scope.
- **Children face a cliff edge moment when they turn 16:** platforms will face fewer incentives to make platforms safer-by-design; and with the Online Safety Act offering a higher standard of protection for children than adults, young people could open social media accounts for the first time with only limited design protections, but while set to experience the same tsunami of harmful, high-risk experiences and misogyny.
- **Social media can be a lifeline for vulnerable children:** social media can offer huge benefits for a range of children, for example looked-after children who rely on social media to stay in touch with family and friends, receive peer support and advice, or to explore their sexual or gender identity. Social media and smartphone restrictions may exacerbate loneliness and social isolation for many potentially vulnerable children and may result in some experiencing poorer mental health as a result.
- **Social media bans will prevent children from disclosing harm:** children will be far less likely to disclose harms they have experienced if they fear they may get into trouble for having used online platforms they shouldn't. Additional barriers to disclosing abuse or seeking support for poor mental health are likely to result in significantly more adverse impacts for already vulnerable children, and it is difficult to conclude that imposing any additional barriers will be in their best interests.

We recognise there is a broader debate to be had about smartphone access in schools, with both online safety and pedagogical considerations. We think such decisions are best implemented from the ground up rather than top down – and support giving schools the power to do what's best in their own educational settings.

Where schools do want to proceed smartphone restrictions, funding should be available to support implementation e.g. the cost of phone lockers.

After many years and much hard work from so many people, the UK is on the verge of benefiting from online safety regulation taking effect that can make a transformative difference to the safety and well-being of young people. It would be devastating to rush towards another solution only to find it will take longer to implement and deliver poorer safety outcomes.

We owe it to our children to focus on making the most of the powers set out in the Online Safety Act. We should encourage Ofcom to take bold steps when regulating, and we call on all political parties to commit to finish the job by strengthening the regulatory framework and ensuring it offers global-leading standards of protection.



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