

Government of Jersey  
Union Street | St Helier | Jersey | JE2 3DN

Deputy Catherine Curtis  
Chair, Children, Education and Home Affairs Scrutiny Panel.

10<sup>th</sup> March 2025

Dear Chair,

**Re: Scrutiny Review: What protection do children in Jersey have from online harms?**

Thank you for your letter dated the 24<sup>th</sup> of February with questions regarding the protection of children from online harms. Please see my responses to your questions below.

**Government policy**

**1. Per the Ministerial Responsibilities listed in R.118/2024, you have responsibility for ‘Co-ordinating policies to safeguard children and support children’s well-being’. Please could you describe what work has been done, if any, to create or co-ordinate policies that will safeguard children from online harms and support children’s well-being with regards to the digital world?**

In addition to those responsibilities delegated to me as Minister for Children and Families under R.118/2024, I also have legal duties under the Children and Young People (Jersey) Law 2022. As the responsible Minister I have political oversight and responsibility of safeguarding and corporate parenting policy.

I discharge these duties working alongside other Ministers at the Corporate Parenting Board, Children's Outcomes Executive Committee, and the Safeguarding Ministerial Group. These bodies have oversight of the key considerations that are relevant to policy and practice regarding online harms. They provide Ministers and senior officers opportunities to share and make connections between different ministerial policy agendas.

**2. What work, if any, has been done to assess how existing Government policies protect all children from online harms?**

**a) If applicable, please describe what this work has identified.**

An example of work that has contributed to protecting people from digital harms is the taskforce that was established by the Minister for Justice and Home Affairs in 2022, to tackle violence against women and girls (VAWG) in Jersey. Members of the Taskforce

include a range of key stakeholders across public services, specialist support services, education, community support.

The Taskforce undertook research with victim-survivors, children and young people, professional services, and the general public in Jersey. The aim was to get a better understanding of the problem on the Island. The Taskforce Report was published in November 2023.

The report provided recommendations for government and other key stakeholders to reduce such violence in all its forms and to improve the support available for victim-survivors. The Taskforce's Report made 77 recommendations, 58 of which were for the Government of Jersey.

Legislative changes that impact young girls are part of the current administrations published legislative programme which include widening online offences with reference to cyber stalking and flashing.

**3. We understand that Children's Homes are not covered by the 'Online Safety Policy' but note that in the hearing on 4th October 2024, you confirmed that there is a strict filtering and monitoring service in place. Please could you provide the Panel with a copy of this policy and / or describe how it works in practice?**

**a) Please could you confirm if there are policies and procedures for filtering and monitoring content accessible on mobile devices of children in the care of the Minister?**

The Residential Service has a system called Sophos set-up in its children's homes, which monitors Wi-Fi use and filters/blocks harmful content. This applies to all devices connected to the Wi-Fi, including children's own devices. Internet rules and expectations are set out in each home's Children's Guide, an easy-read document provided to residents.

Vulnerabilities and safeguards in relation to online harm are addressed in individual children's care planning documents and safety plans. Residential staff monitor children's internet use and, in some cases, check children's phones for any evidence of risk. Keyworkers discuss safety and relationships (including social media and internet safety) in keywork sessions with children.

We are undertaking a wide-ranging review of all of our policies across the whole service, including all those in the residential estate, and these are currently in draft.

**4. How is the Government of Jersey ensuring that it keeps pace with developments in other jurisdictions relating to online safety for all children? Children's Rights**

The UN Committee's publication of General Comment 25 (Children's Rights in the Digital Environment) offers a useful framework for understanding the wider children's rights considerations for policy makers.

Government works closely with the Office of the Children's Commissioner, and there is ongoing proactive engagement during the policy development process. In addition, there is a statutory requirement to consult the Children's Commissioner on legislation that impacts children, under Article 25 of the Commissioner for Children and Young People (Jersey) Law (2019).

Across Government, on behalf of the Minister for Sustainable Economic Development, new approaches to data protection legislation and regulation of online platforms in other jurisdictions are monitored on a regular basis. Policy officers have built relationships with off-island law making and enforcement bodies such as Ofcom and the European Commission. In addition, the Jersey Office of the Information Commissioner (JOIC) maintains an excellent network with other data protection bodies across jurisdictions, demonstrated last autumn when Jersey hosted the World Privacy Assembly 2024.

**5. Article 17 of the UN Convention on the Rights of the Child refers to the right for children to have access to reliable information from the media and includes the requirement that "Governments must help protect children from materials that could harm them".**

**Outside of the 'Online Safety Policy' and the 'Keeping children safe in education' policy, can you describe how the Government of Jersey protects children from online harms?**

The Jersey Office of the Information Commissioner has a strong education awareness raising programme with the ambition to create an Island culture whereby the protection of personal data and data privacy **is instinctive**. In 2023, JOIC delivered personal information safety sessions to more than 2500 young people and 1671 individuals attending JOIC events. This work continues.

**6. How will the Government of Jersey ensure that due regard is provided to the needs and rights of children who may be at risk of, or subjected to, online harms? Legislation**

The Children Convention Rights (Jersey) Law 2022 places a duty on all States Members to give due regard (careful consideration) to children's rights as set out in the UNCRC when making decisions or discharging their functions. This includes the publication of Children Rights Impact Assessment which demonstrates compliance with the due regard duty placed on States Members.

As legislation concerning digital protection is developed and considered by the Assembly the completion and publication of a Children's Rights Impact Assessment of each piece of

policy and legislation is a critical method of ensuring children's rights are engaged during the policy development process.

**7. At the public hearing on 4th October 2024 the Panel heard that Jersey would develop its own legislation relating to aspects of online safety. What can you tell us about Government progress to pursue legislation for online safety in Jersey?**

**a) Please can you confirm if there will be a separate / specific piece of legislation, or if it will be solely dealt with through amendments to existing legislation?**

Across Government, the Minister for Sustainable Economic Development (MSED) is currently looking at legislative options to amend Jersey legislation to facilitate the removal of internet content that infringes the data rights of Jersey citizens, including children. The aim is to empower citizens to request removal from relevant online platforms and seeks to shorten the response times of the platforms and effective remedy.

Officers within the Department for the Economy have analysed legislative approaches across multiple jurisdictions that have sought to legislate and regulate the online environment. The MSED has concluded that appropriate proportionate protection against online harms for Jersey citizens is through effective and timely enforcement and is seeking to amend local legislation, for example the Data Protection (Jersey) Law 2018, to capitalise on established enforcement bodies and networks on island.

**8. What evaluation, if any, has been undertaken by Government to assess the protection that existing legislation provides for children against online harms, such as, inappropriate content, cyberbullying, scams, addictive behaviours, etc? Please share details of any evaluation / assessment with the Panel, where possible.**

The Children and Young People Survey offers an opportunity to understand the extent of online harms experienced by children and young people. The survey is run every two years and can vary questions according to where there is interest in views and subjects. The survey results offer a form of evaluation of impact where there has been significant policy change that impacts young people.

Going forward opportunities exist to use the Jersey Opinion and Lifestyle Survey (JOLS) to understand adults' perspectives on aspects of parenting children in an online environment. For example, OFCOM have used surveys to better understand parents and children use and attitudes to social media use<sup>1</sup>.

**9. What assessment, if any, has been undertaken by Government to confirm whether legislation elsewhere (for example the UK's Online Safety Act 2023 or the EU Digital Services Act) will impact content viewed by children in Jersey? Training**

---

<sup>1</sup> [Children and Parents Media Use: Attitudes Report 2024](#)

Given the global nature of the internet and the vast volumes of data being shared and viewed, understanding specific impacts of legislative changes made by other jurisdictions on small population groups such as Jersey children will be extremely difficult. However, the regular surveys as mentioned offer an opportunity to monitor trends over time.

Across Government, policy officers within the Department for the Economy have held meetings with regulatory bodies in other jurisdictions to understand the regulatory hurdles and impact of local legislation in the online safety policy area. For example, discussions have been held with Ofcom the online safety regulator in the UK and with the e-Safety Commission in Australia and the European Commission and engagement with such bodies continues.

Generally, it has been observed that awareness among internet service providers for different online safety threats has significantly improved and that they are increasingly disabling access to, or removing, such content. Within 6 months, the biggest online platforms (such as online marketplaces, app stores, social networks) that are obliged to report the "requests for removal" to EU Digital Services Act Database have recorded more than 10 billion "statements of reasons", which explain the content moderation decision made and the reasons behind the decision, (<https://transparency.dsa.ec.europa.eu/?lang=en>). While only a fraction of these fall within the category of "online harms", the sheer number shows that most platforms have already taken effective measures to improve the safety of their platforms.

**10. Please can you describe and provide examples of how children in the care of the Minister are taught about safeguarding relating to their online safety?**

Foster carers are trained in safeguarding children, which includes how to keep children safe when using mobile phones or the internet. Foster carers are required to have parental controls on their own devices, as well as children's devices so that inappropriate material cannot be accessed. Foster carers are also expected to have regular discussions with children in their care and record in daily logs when these have taken place.

**11. Please can you describe and provide examples of how children are taught about safeguarding relating to their online safety in youth club settings?**

The Youth Service has several curricular resources that are available for youth workers to use about online safety, from a range of places including JOIC, Safer Internet Day, NSPCC, and Child Net. Staff also have access to resource packs, videos, and information sheets that staff to use in informal learning sessions.

The Jersey Office of the Information Commissioner outreach workers have an education awareness raising programme, and they have visited to all youth clubs, spoken with young people, and delivered workshop to all JYS contractual staff.

The Youth Service also delivers annual Exploitation Workshops around all schools to year 9 students and these focus on sexual, criminal, and online exploitation.

**12. Please can you describe and provide examples of how parents / carers are informed and provided with advice by youth clubs about children's access to online sites and online safety?**

The Youth Service does not provide advice to parents or carers about online safety through youth clubs. However, the YES project has a section on its website ([link](#)) around online safety so that information and advice is available for children, young people and parents 24/7. These items cover:

- Stay Safe online at home
- How to change privacy settings
- How to turn off your location
- Sexting
- Cyberbullying

**13. Please can you tell us about the online safety training that is provided to CYPES staff in the Jersey Youth Service and Children's Services?**

All staff in Children's Services and the Jersey Youth Service must complete the Government of Jersey's mandatory corporate Data Protection training on an annual basis, and Cyber Security Awareness Training on a biannual basis. Both modules include outcomes relating to working safely online and include an assessment of learning.

**Children's Social Care**

In addition to this, in 2024 a bespoke Data Protection training programme has been Implementation

developed and delivered specifically for Children's Social Care. This is a 4 hour in person training programme that includes a specific module on information security, with outcomes linked to understanding responsibilities related to cyber security, sharing information safely, and key policies related data security and use of social media. This programme has been examined via a formal online assessment to ensure staff understand their responsibilities with regards working safely online. The programme has been delivered to all staff in the social work teams, and a tailored version is now being delivered across the residential aspect of the service with expected completion for all staff by the end of March 2025.

**Youth Service**

All new Sessional Youth Workers and volunteers must undertake the Youth Work Essentials Course within 6 months of starting in post, which covers topics such as safeguarding and boundaries, amongst others. The safeguarding session has a discussion focused on keeping young people safe in a range of settings, including online. Within the boundaries session there is an element of online safety included in the scenarios that are discussed.

The Youth Service have young workers who are between the ages of 15 to 18yrs, who receive training as well, covering topics such as safeguarding. Following a recent review by the JYS Training & Development Officer a new online safety module is being incorporated into their training to equip them with enough information to support their peers.

JYS have several employees currently studying for a level 3 diploma in youth work. Within this, they explore communicating safely online and the different platforms that young people use and discuss the pros and cons of social media use for young people.

Youth Workers studying for a degree in youth work have the opportunity to learn about digital youth work, examining a whole range of topics including how to ensure young people are safe online and how to utilise digital tools to engage and support young people.

Over the past 3 years some JYS staff have attended the Digital Youth Work Conference, which falls on Safer Internet Day, to learn about informal educational programmes being delivered across Scotland teaching young people about cyber resilience and security from expert speakers in the field. A member of the JYS sits on the National Youth Agency Digital Youth Work Forum, which meets every 6 weeks to receive updates about the Online Safety Act in UK and share examples of good practice.

At this year's Jersey Youth Service Annual Conference, a guest speaker from the UK will be talking about digital youth work, delivered to 100 contracted, sessional, volunteers and young workers. This will undoubtedly include a discussion on keeping young people safe online whilst using digital tools.

A number of JYS staff have also attended the Online Safety Conference organised by the Safeguarding Partnership Board, and the campaign group to promote across schools and the community includes a member of the JYS. All JYS staff have been requested to complete a survey on this, to understand how we are responding to observations or concerns.

## **Monitoring**

**14. How does the Jersey Youth Service fulfil its responsibilities (as per the 'Online Safety Policy') to "oversee and monitor the use of technology when children are in their care"?**

**(a) How is this managed when the children / young people may have access to mobile phones or other devices with internet access?**

The Jersey Youth Service does not currently provide any devices for children and young people to access the internet, so there is currently no need to oversee and monitor the use of technology when attending a youth club.

The Youth Service would like to expand a digital youth work offer and this would be assessed to cover all safeguarding risks.

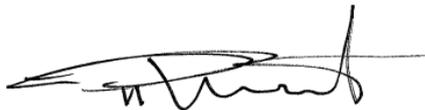
Should any young person make a disclosure of any safeguarding concern either online or other forms of abuse, this would be managed within the Safeguarding policies and may involve engagement with the Hub, Police, Schools and parents.

As part of the Youth Work curriculum, Youth Workers in clubs and projects should develop appropriate learning opportunities if they became aware of any online risks, which may include poster displays, targeted workshops, or one-to-one direct work with a young person.

**15. The CYPES policies highlight the importance of maintaining accurate records of online safety incidents. Please can you provide the Panel with data to confirm how many online safety incidents have been recorded across youth clubs in the previous five years? [If possible, please can you break down any answer to identify the types of incidents that are recorded].**

JYS use the Lightspeed filtering system that is used in all Government of Jersey Schools to mitigate any incidents. The JYS leadership Team are not aware of any online safety incidents through youth clubs.

**Yours sincerely**

A handwritten signature in black ink, appearing to be 'Richard Vibert', written over a horizontal line.

**Connétable Richard Vibert**  
**Minister for Children and Families**  
E | r.vibert2@gov.je