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

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

9 June 2025

Dear Chair,

Re: Follow-up matters from the Public Hearing "What protection do children in Jersey have from online harms?"

Thank you for your letter dated 2 June 2025 with requests for additional information, following our public hearing on 23 May 2025. During the hearing, I committed to providing clarification two matters relating to Jersey's legislation, and the operating policy and procedures for mobile phone use in children's residential settings.

Jersey Legislation – The term "legal but harmful"

The term "legal but harmful" was introduced in the original draft for the UK Online Safety Bill. The aim was to create a category of internet content that is not per se illegal but would have led to additional duties of care for internet service providers.

The parliamentary debates in Westminster revealed that the introduction of a "legal but harmful" category would cause considerable legal uncertainty, might lead to over-censorship and be very difficult to enforce. The term "legal but harmful" was thus removed from the UK Online Safety Bill.

In Jersey, we have established a cross-ministerial group for helping to shape legislation for online safety across government. This involves identifying specific legislative gaps and addressing them in the appropriate government departments.

Mobile Phone and Internet Use in Children's Residential Settings

As promised, I have provided the Panel a copy of the 'Safe Use of the Internet, Social Media, and Photographs' Operating Policy. There is no specific risk assessment template for seizing a child's phone, but a generic government-wide risk assessment template is used in our residential settings. There is also information in each child's Care Plan,

Placement Plan, and Residential Safety Plans which outlines how we manage their use of devices.

Currently, there is no internet filtering in our Short Breaks homes, which are used to provide overnight breaks for children with significant learning disabilities. The children don't bring mobile phones, but some have iPads, and these are subject to parental controls. The children are not left unsupervised on their iPads. Along with the rest of the estate, these Short Breaks homes are in line to be fitted with new filtering systems. The project plans to implement these systems are currently under consideration.

I trust the above clarifies matters for the Panel.

Further Questions

Please see my responses to your questions below.

1. **Could you clarify the current and planned strategies addressing risks associated with children accessing or sharing suicide or self-harm content online, specifically:**
   a. **Educational or preventive programmes in place.**
   b. **Systems for rapid response and intervention when such content is identified**

The wellbeing and safety of children remains our highest priority, especially when it comes to deeply distressing issues like suicide and self-harm content online. These risks are very real, and our response must be both proactive and responsive, grounded in compassion and supported by robust systems.

   a. Currently, the approach includes awareness-raising and prevention through personal, social, health and economic (PSHE) and Computing Curriculum education in schools, supported by initiatives across primary and secondary phases, including a programme developed with the NSPCC. These are increasingly aligned with digital wellbeing and online resilience.

   In addition, we are enhancing our wider Online Harms guidance to also include sessions from professionals to give young people tools to navigate the online world safely, including recognising and responding to harmful content. We are also looking at expanding this work beyond schools, so that youth services, sports clubs, and community organisations are equipped to support young people in managing digital risks.

   b. Where concerning content is identified, we rely on a multi-agency safeguarding response, coordinated through the Children and Families Hub and, where

appropriate, CAMHS (Child and Adolescent Mental Health Services). The Hub provides a single point of contact for concerns relating to children's safety and wellbeing, and it works in partnership with schools, health professionals, and the police.

However, we recognise the need to strengthen our real-time response capabilities, especially for digital threats. To that end, we are reviewing how technology, training, and inter-agency protocols can be improved to allow for quicker identification and escalation of online content that poses risk to a child's life or wellbeing.

2. **Could you outline key learnings derived from the May 2022 'Children and the Digital World' report? Please confirm if subsequent work or initiatives have been undertaken in response. Specifically:**
   a. **Are early intervention programmes within the Children's Mental Health and Wellbeing Service now including information to support families on issues such as screen time and cyberbullying?**

The [Children and the Digital World report](#) provided valuable insights into how digital life is impacting our young people's wellbeing. Among the key learnings were the need for consistent digital education, stronger family-focused guidance, and early support around the emotional and psychological effects of online harms, including screen time, cyberbullying, and digital addiction. In response, we've taken several important steps:

- In 2023, the new Digital Education Strategy was launched, which not only supports the development of digital skills for young people and educators, but places wellbeing and responsible digital citizenship at its heart. This includes building a common framework of age-appropriate digital and non-digital life skills, from early years to post-16 education.

- A review of online safety systems across schools and children's care homes has been undertaken, with a project now in progress to enhance protective measures and ensure consistency in safeguarding across settings.

- Alongside this, a review of the CYPES Online Safety Policy and Digital Harm Guidance is underway, with updated materials to better reflect the realities of modern digital life including the impact of screen use on sleep, anxiety, and relationships and cyberbullying.

a. Our Children's Mental Health and Wellbeing Services are increasingly integrating digital wellbeing into its support for families. Further training and support for these staff are being reviewed to be able to consistently provide practical information on issues such as screen time management, identifying signs of digital anxiety or

addiction, and understanding cyberbullying. The aim is to ensure that early support services are not only clinically responsive, but also relevant to the challenges children and families face today, particularly in the online space.

3. **Could you detail how online safety and digital life for young people are reflected in the 'Big Picture Outcomes' of the Children and Young People's Plan 2024–2027, including:**
   a. **Progress on data collection for indicators, such as the percentage of young people who feel safe online.**
   b. **Adaptations or potential updates to the plan to reflect evolving digital challenges**

The Children, Young People and Families' Plan 2024-2027 includes the big picture outcome to ensure all children and young people in Jersey are safe and loved. Results from the Jersey Children and Young People's survey form part of this review.

a. As part of the data development agenda the plan proposed including the following indicator: *% of young people (aged 12-18) who feel safe (at school, at home, at work, online, in the community, where they live).*

This indicator remains under review for consideration and possible addition to future Jersey Children and Young People's Surveys.

b. The Children's Outcomes Executive Committee (COEC) oversees the Children, Young People and Families' Plan 2024-2027. The key opportunity presented by the Children, Young People and Families' Plan is to align government programmes for improvement, including commissioning activity, children's engagement and participation as well as its work with the community and voluntary sector behind a consistent set of shared children's outcomes.

As part of my response during the Public Hearing on 23 May I referred to the importance of engaging with children on this topic. In November this year, e-safety will be discussed at the School Council Network with the Information Commissioner. Output from the session will be fed-back to Ministers at the next meeting of the Children's Outcomes Executive Committee for further action.

4. **Could you provide your view on incorporating the concept of "digital safety by design" into Government policy making regarding online safety?**

The integration of digital safety by design should be supported into government policymaking as a proactive and child-centred approach to online safety. This concept goes beyond placing responsibility solely on families or schools, it places the onus on
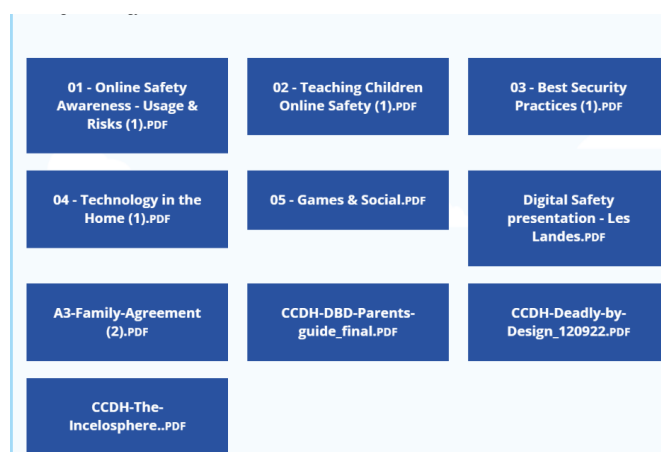
tech developers, digital platforms, and regulatory frameworks to create online environments that are safe for children from the outset.

We are committed to safeguarding and promoting the rights and wellbeing of all children, this means embedding digital safety principles into the development, procurement, and regulation of technology used by children. Platforms should be designed to default to safety, offering age-appropriate privacy settings, clear reporting tools, and content moderation that prioritises child protection.

This approach aligns with our broader Online Harms guidance (that is currently being developed) and supports our obligation under the UN Convention on the Rights of the Child, particularly the right to protection from exploitation and harmful content. By adopting "digital safety by design" across government policy, we can ensure that Jersey remains a leader in promoting safe, inclusive digital experiences for all children, now and in the future.

5. **Please outline the resources and support measures available for children and families who have experienced online harm, particularly cyberbullying or exposure to inappropriate content. Additionally, detail any information or data demonstrating the effectiveness of these resources.**

Currently, parents and families are largely supported through schools, who can provide online content and safety talks. An example of the information provided can be found on Les Landes schools website. Additional resources can be found here.

01 - Online Safety Awareness - Usage & Risks (1).PDF	02 - Teaching Children Online Safety (1).PDF	03 - Best Security Practices (1).PDF
04 - Technology in the Home (1).PDF	05 - Games & Social.PDF	Digital Safety presentation - Les Landes.PDF
A3-Family-Agreement (2).PDF	CCDH-DBD-Parents-guide_final.PDF	CCDH-Deadly-by-Design_120922.PDF
CCDH-The-Incelosphere..PDF		

Parents or members of the public that are concerned about a child's welfare, regardless of whether it is online or not, can report this to the Safeguarding Partnership Board

A space is also currently being developed on gov.je (Keeping your child safe online), which will include the child's voice and representation of their and families experiences, and

pathways to take to tackle concerns. This will be a living space, updated regularly as policy and legislation develops, and feedback welcomed.

I hope that the above is of assistance to the Panel.

Yours sincerely,

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