

10th April 2025 – [Victoria O’Neil]

Sent to Scrutiny inbox (scrutiny@gov.je)

Subject: Scrutiny Panel- online harms submission

Message:

Dear Scrutiny Panel,

I write as a concerned parent whose child is going into a state secondary in September 2025.

Online safety is a complex issue and the pace of technology, and the access and intelligence smart phones now possess, has accelerated significantly over the last few years. We cannot ignore the amount of news coverage we are starting to see that surrounds smart phones and social media and their safety in relation to how and what children are now consuming via social media platforms. What is increasingly apparent is that ‘Big Tech’ are fully aware of the addictive nature of their platforms and that harmful suggested content is easily and readily available to children such as suicide, ‘thinspiration’ and extreme violence. Despite these leaks from whistleblowers (only this week with Sarah Wynn-Williams testifying), we still see nothing to suggest their responsibility in ensuring these spaces are safe and devoid of such content and real robust solutions in how they (META etc) intend to mitigate the risks of this content being consumed by our children.

With reference to the Children Commissioner’s submission, Children do indeed possess digital rights, including access to information and freedom of expression. However, these rights must be balanced with their right to protection from online harms. The United Nations Convention on the Rights of the Child (UNCRC) addresses this balance, particularly in Article 19, which states:

"Parties shall take all appropriate legislative, administrative, social and educational measures to protect the child from all forms of physical or mental violence, injury or abuse..."

Furthermore, General Comment No. 25 (2021) on children's rights in relation to the digital environment emphasizes that:

"Parties should ensure that appropriate measures are in place to protect children from risks and harms that may arise from their engagement with the digital environment."

These provisions underscore that while children have the right to access and participate in the digital world, there is a concurrent obligation to safeguard them from potential online harms.

I feel the commissioner's comments appear to overlook the necessity of this balance - emphasizing digital access without adequate attention to protection mechanisms. Ensuring children's well-being in the digital realm requires policies that both empower their digital engagement and robustly protect them from associated risks. The UNRC does suggest that when designed and used appropriately, digital technology can advance children's rights and wellbeing, but we are simply not seeing this, and evidence now suggests the opposite because tech companies are deliberately not keeping their platforms safe.

A child learning how to code through Computer Science or using spreadsheets with Information Technology and enhancing their digital literacy is what I believe the UNRC are referring to. But I would argue in the case of online harms, most are proliferated via a smartphone which is not referred to by the Children's Commissioner. A smart phone gives easy access to social media platforms like Snapchat or TikTok, and I would argue that a delay to this would not be an infringement of their rights and would protect them until they are able to make responsible choices for themselves. I fundamentally agree that we now have a responsibility to ensure that our children understand their roles as digital citizens in an ever-evolving technological landscape, but I will elaborate more on this in a moment.

Online safety has now gone beyond 'digital wellness' or 'teaching your child to use social media safely'. Social media is not a simple tool. It is a powerful addiction-driving giant that is quite bluntly stealing our children's childhoods and has created a cataclysmic boom of late teens and young adults who are anxious and depressed (I refer to the release of research in October 2024 from Oxford University entitled "Brain Waves").

The harms of social media are now being documented by trustworthy research and there is now a proven link between social media use and these mental health difficulties (please see: www.healthprofessionalsforsaferscreens.org) Delaying children's access to smartphones and social media has been advocated by various health professionals and organisations due to concerns about potential harms.

Here are four arguments supporting this position:

1. Mental Health Risks

Excessive use of social media and smartphones has been linked to increased rates of depression, anxiety, and other mental health issues among adolescents. The organization Health Professionals for Safer Screens emphasizes that social media is a substantial cause of depression and anxiety, leading to behaviours related to these conditions, including self-harm and suicide.

2. Disruption of Sleep Patterns

Screen time, particularly before bedtime, can negatively impact children's sleep quality and duration. The blue light emitted by screens interferes with melatonin production, a hormone responsible for regulating sleep. This disruption can lead to delayed sleep onset and reduced sleep efficiency, affecting overall health and cognitive function.

3. Impaired Social Development

Early exposure to smartphones and social media may hinder the development of essential social skills. Health Professionals for Safer Screens note that the pervasive presence of smartphones is altering children's understanding of the social world and their ability to interact in person with friends, family, and the community. This shift could have long-term impacts on personal and professional life prospects.

4. Exposure to Inappropriate Content

Children with unrestricted access to smartphones and social media are at risk of encountering harmful or inappropriate content. The Royal College of Paediatrics and Child Health has expressed concern over the lack of research into the benefits and harms of social media and mobile phone use, especially given its widespread impact on young people. They advocate for governmental measures to keep social media companies in check and ensure young people's safety online.

What is the solution?

For us to truly change the culture around smart phone use, social media, and consequent online harms, we need bold courageous leadership. We need to work together as a community that joins parents, schools, and the government to make the future generation of children's lives happier and healthier. This looks like:-

- **Educations and Awareness:** Both primary and secondary schools must be smart phone free zones and by that, I mean they are stored in boxes from registration until home time. This will require positive engagement with schools, but it has been achieved by many schools in the last year in the UK who have more than double the students in any school on island (see Grey Court, Kingston as an example where there are 2000 students).
- **PROCESS:** Smartphone free childhood has brilliant resources (<https://smartphonefreeschools.co.uk/opinion-7-steps-to-becoming-a-smartphone-free-school>) but this is also one example I had from a parent in the UK:

'The process at the school was that parents were emailed and told that the policy around smart phones were changing. Parents were asked if their child needed to have their smartphone (eg medical reasons) and to also confirm if their child did not yet have a smart phone. The school then created a register based on exemptions. Once the policy came into effect, the children put their smart phones into a class lockbox at morning registration and the box is then taken to a locked cupboard at the school office. If the child must leave for a medical appointment or sports fixture, they then go to the office to collect and sign out the phone. For school trips, if the trip returns to school at the end of the day, then smart phones are locked away as usual. If the trip is overnight, or if the children have to make their own way home directly, then smart phones are allowed but must be switched off for the duration of the trip and until they are given

permission to switch them on again. This is important as the school experienced events where photos were taken and shared without permission of other children and was a cause of online bullying. Phones are then collected at the end of the day’.

AWARENESS: I agree with the Safeguarding Partnership Board, and we have a duty of care to promote online safety as a Public Health concern. If we can promote delay of buying kids smartphones in primaries and educate parents of the harmful online content, this would be an excellent starting point to change the culture in buying children smartphones. I would also agree for more public awareness campaigns to encourage the importance of raising digital citizens so we allow our children to learn how to live a digitally independent life at an age appropriate time through conversations, critical thinking (influencers) and how to set up a family online agreement (see www.raisingdigitalcitizens.com)

If we want change, we need to act quickly. I urge the panel to bring in immediate changes in time for September 2025 (even if this is phased initially with year 7’s). We are currently on a slow train with very little recourse for action if anything awful happens to children on the island online or because of viewing or being influenced by harmful content. I also fear for my own child’s safeguarding whilst at school. He does not have a phone, but I know the secondary he is attending allow smartphones during breaks. I would urge you to consider the risks this poses those children that whose parents do not wish for them to have smart phones. If my son sees something harmful or distressing on a peer’s phone this must trigger huge safeguarding and duty of care vulnerabilities, as the school cannot guarantee he will not see something of this nature whilst in their care? This too must be considered as part of a legal and educational framework when considering online harms.

My key action points are:

- Implement immediate plans to make all secondaries across Jersey Smart Phone Free in lockable storage bell-to-bell during the school day.
- Public Health campaign to promote the delay of buying smart phone devices for children under 16.
- Public Health campaign to promote the delay of use of social media.
- Robust and significant online laws to protect children from online harms. This should include the promotion of delay with devices and setting a legal age at which to buy smart phones and access social media.

Thank you for your consideration,