
STATES OF JERSEY



WHAT PROTECTION DO CHILDREN IN JERSEY HAVE FROM ONLINE HARMS? (S.R.4/2025): RESPONSE OF THE MINISTER FOR CHILDREN AND FAMILIES

**Presented to the States on 19th December 2025
by the Minister for Children and Families**

STATES GREFFE

Government Response to the CEHA Scrutiny Panel Report - Online Harms

The Council of Ministers has a clear and firm commitment to safeguarding children from online harms and is continuing with its work to deliver on this commitment.

Ministers welcome the work of the Children, Education and Home Affairs Panels report on this important policy area. It is a compelling and constructive contribution.

Our response to the report seeks to highlight the work which is underway or has been completed across multiple departments. Ministers also welcome the report highlighting additional areas of work, to which Ministers are responding positively.

Fundamentally, the Council of Ministers believes that all States Members strongly agree that it is important that we make swift, as well as effective, progress in response to a fast-moving technological and regulatory environment. The public can be assured of our commitment to work with all States Members to achieve this.

This includes:

- Increasing Education and Awareness
- New policy and legislation
- Industry Engagement
- Engagement with Children and Young People
- Leadership and Coordination

1. Education and Awareness

DigiSafe Jersey: A New Online Guidance Hub for Digital Safety

The new website(<http://www.digisafejersey.gov.je>) provides one place for parents and young people to access clear information and guidance on topics such as:

- Recognising and responding to online risks
- Supporting children and young people in their digital lives
- Guidance for families and carers and the community
- Signposting to relevant resources

Safeguarding Campaign – NSPCC:

Following a local conference which hosted national speakers from the Centre of Expertise on Child Sexual Abuse and the Internet Watch Foundation; dedicated resources have been developed by local parents, NSPCC and Safeguarding Partnership Jersey called "Be The First Filter": The resources support parents and carers to guide children (9-11) to be safer online, acting as a filter before content is shared.

2. New Policy and Legislation

Schools and Colleges:

Schools and colleges continue to be in the frontline of ensuring children and young people are safeguarded from digital harms. A new Digital Safeguarding and Technology

Use Policy has now been published for use across schools and colleges. This policy compliments the Ministers guidance on the use of mobile phones in schools which has been well received by students and parents.

Public Consultation – Legislative Change

Drafting instructions were issued in October to develop new legislation to provide Islanders with stronger rights to get illegal content removed from social media, websites and search engines.

A public consultation is planned to start in January 2026, in which Islanders will also be asked to comment on a proposal to enhance online privacy, by providing a legislative route to request the removal of content where they can be recognised but the content has been uploaded without their consent and the publication of which causes them harm, distress or reputational damage.

These routes are better than extending the UK's Online Safety Act to Jersey by a Permissive Extent Clause (PEC). The States Assembly, our elected parliament, legislates for Jersey - delivering the best solution for our Island and maintaining Jersey's legislative independence. This approach enables us to develop legislation based on global best practice, including the most effective mechanisms for engaging with global social media companies. It should also be noted in respect of online harms that neither the Isle of Man nor Guernsey have yet activated their PEC and the UK itself continues to progress several separate policy initiatives, recognising that the Online Safety Act is not a panacea. Instead, Jersey should develop its own legislation to ensure that we have the most effective legislative protection for Islanders.

Legislation to protect Violence Against Women and Girls

The Minister for Home Affairs will lodge legislative amends which will contribute to measures to safeguard children from online harms. Firstly, introducing amendments to address creation of intimate deepfakes, nonconsensual sharing of intimate images and expansion of the offence of sexual grooming of a child. Secondly, the Minister will bring forward amendments to address stalking, including cyber stalking.

3. Industry Engagement

Telecommunication Sector Engagement

Ministers' are actively engaging with local internet service providers to explore opportunities to innovate and work together to keep young Islanders safe online. As

technology evolves and impact of other jurisdictions legislative actions becomes clearer, families will continue to seek help and support locally.

4. Engaging Children and Young People

School Council Network

Children and young people at the School Council Network have been engaged with a number of activities on the subject of digital harms. Their ideas and experience have been used to support the development of the new online guidance hub. Students were tasked with creating scenarios that feature in the new guidance hub and finally both created and voted for the name DigiSafe Jersey.

Young people have been very clear about the need for alternatives to screens. Government has worked with young people and other stakeholders to agree a clear Play Plan, which will be published in December 2025. This provides a clear commitment to future improvements being made and provide an accessible alternative to computers and screens.

5. Leadership and Coordination

Government coordination in this area is being led by the Minister for Children and Families with input from across the Council of Ministers. This ensures a balanced and child centred approach to future government policy and legislation to keep children and young people safe in digital environments.

Next year a legislative gap analysis will be produced. This work will commence early in January 2026. This will assist the next government to continue to progress a responsive and proportionate legislative framework reflecting the importance of keeping children safe from digital harms.

WHAT PROTECTION DO CHILDREN IN JERSEY HAVE FROM ONLINE HARMS? (S.R.4/2025): RESPONSE OF THE MINISTER FOR CHILDREN AND FAMILIES

Ministerial Response to:	S.R.4/2025
Ministerial Response required by:	19th December 2025
Review title:	What protection do children in Jersey have from online harms?
Scrutiny Panel:	Children, Education and Home Affairs Scrutiny Panel

INTRODUCTION

The Children, Education and Home Affairs Panel published its review into ‘Online Safety for Children in Jersey’ on 7th November. The review’s main objective was to examine Jersey’s approach to online safety, with a particular focus on children and young people. Evidence gathering included Public Hearings with Ministers and submissions from local stakeholders.

The Panel made an assessment on how the government is working to address potential harm to children and young people through online platforms and digital content and, also, how well children in Jersey are protected through existing legislation and policy. The Panel’s report has returned 63 findings and 38 recommendations for the government and highlighted 6 key findings and 5 key recommendations.

The Government welcomes the Children, Education and Home Affairs Panels review and report on this important policy area and has set out its response to the findings and recommendations below.

FINDINGS

	Findings	Comments
1	There is currently no internationally recognised definition for “online harms” however, a range of shared classifications and terminology has emerged. Establishing consistent language and definitions is important for improving understanding and addressing the complexities of online harms.	Agreed. The pace of technological change and the terms used to describe the innovations represent a challenge to policy and legislation to remain current.
2	Online harms are not experienced equally and in order to address risks it is important to understand <i>who</i> is harmed	Agreed. It is important to engage parents, carers and children in understanding who and how harms are experienced.

	Findings	Comments
	and <i>how</i> . Online risks can reflect or intensify the dangers children face offline, with those already vulnerable in real-world settings more likely to be at risk in digital spaces.	The recent work led by NSPCC alongside government is an example of good practice in engaging parents and children on this subject area. At the start of this school term an expert speaker on e-safety and risks of online harms (Natasha Deveon) spoke to many children and parents across the Island Schools Equally, the School Council Network are already offering officials real insights into how young people experience online harms and offer some key principles for action.
3	Protective measures or “guardrails” can be used in policy and legislation development in relation to technology developments, such as A.I. and other emerging digital tools. These safeguards help ensure that innovation is balanced with ethical considerations, user safety, and the protection of fundamental rights, particularly for vulnerable groups such as children and young people.	Finding is noted. It remains unclear, at this point in time, how effective recent legislative changes in UK and Europe have been in establishing guardrails to new technology, including Artificial Intelligence.
4	[Key Finding] Although Jersey has been typically regarded as a safe environment for children, it remains vulnerable to the risks associated with the online world. The borderless nature of digital spaces means that children and young people in the Island can be exposed to harmful content and influences originating from anywhere in the world. A recent court ruling has brought to light a case involving the exploitation of local children where communications have been facilitated by online platforms.	Agreed. Recent children's legalisation (which led from the recommendations of the IJCI) now gives Ministers a robust legal framework to tackle online safeguarding risks to children and a mechanism to require further policy and legislative change where needed.
5	Digital safety or online harms is not an issue that has been raised as a worry or concern by children themselves with the Children’s Commissioner for Jersey, or the Minister for Children and Families. Instead, issues affecting children's health and safety online are more often voiced by parents and other adults.	Finding is noted.

	Findings	Comments
6	[Key Finding] Issues around smartphone and screen use have been highlighted to the Panel by members of the public and through locally collected data. Public Health has referenced data in the Jersey Children and Young People's Survey and has suggested that emerging patterns warrant deeper investigation to better understand the health impacts of screen use and inform policy development in Jersey.	Agreed. The local pattern of increasing screen use by young people in Jersey is typical of similar trends across neighbouring jurisdictions.
7	[Key Finding] No assessment of children's rights was undertaken as part of the analysis of the option of a permissive extent clause for Jersey in the U.K.'s Online Safety Act, despite the legislation's purpose to improve online safety for children. The Panel is concerned that this demonstrates that the lessons and recommendations from the Independent Jersey Care Inquiry (for example, ensuring that the interests of children are paramount and that legislation does not lag behind other jurisdictions) are not widely embedded into practice across the whole of Government.	Key finding is noted. The provisions relating to a formal children's rights impact assessment according to the Children (Convention Rights) (Jersey) Law 2022 were not enacted at the time of the decision on a possible permissive extent clause for Jersey in the U.K.'s Online Safety Act in 2022.
8	The United Nations Convention on the Rights of the Child (UNCRC) Rights are equally applicable to children in the digital environment, and all rights must be considered equally. A tailored approach is essential and there is no one-size-fits-all solution when safeguarding children's rights online.	Agreed. The submission to the panel review by the Office of the Children's Commissioner is a reminder of the current challenges to finding a balanced approach to realising children's online rights.
9	There is a requirement for the States Assembly to approve the extension of any U.K. Act to Jersey, however, there is no formal process or requirement for permissive extent clauses which are offered for Jersey to be discussed by the States Assembly or Council of Ministers, and the decision making power as to whether to reject them lies with the Minister who is deemed to have political responsibility for the relevant area in	This finding is noted. Any future provision that may stipulate the Council of Ministers and Scrutiny are to be involved in the decision on whether to accept or reject a permissive extent clause for Jersey should consider the short timeframe usually set by the UK government for reaching such a decision.

	Findings	Comments
	question. To ensure greater transparency, future decisions should involve clearer information sharing with both the Council of Ministers and Scrutiny.	
10	The decision not to request a permissive extent clause for Jersey in the U.K.'s Online Safety Act was made solely by the Minister for Sustainable Economic Development during the period September – November 2022. The reasoning given for this was that the U.K.'s Online Safety Act was considered to be an overly complex “poor” law, a “tick-box exercise” and, because of the principle that Jersey should legislate for itself.	This finding is noted. PECs are not commonly accepted unless it is a matter on which the States of Jersey could not independently legislate separately to the UK – such as for issues regarding the Common Travel Area. The decision in this instance was made by the Minister for Sustainable Economic Development and then Assistant Minister, Deputy Alex Curtis following advice from the relevant officers.
11	The Minister for Sustainable Economic Development's decision was not recorded in a formal Ministerial decision or shared with the Council of Ministers so there was no opportunity for scrutiny and no transparent decision-making process.	Noted. Permissive extent clauses are typically offered informally at an officer level during the law drafting stage. The relevant Minister holds responsibility for determining if a PEC should be requested and Ministerial Decisions are typically not used to record the absence of a request for a PEC.
12	The Minister for Sustainable Economic Development did not consult the Office of the Children's Commissioner, or the Minister with responsibility for coordinating policies relating to children despite the fact that a central aims of the U.K.'s Online Safety Act is to ensure that children receive a higher level of protection from potential harms associated with internet services.	Finding is noted.
13	There is no evidence that the Minister for Sustainable Economic Development's decision to reject the permissive extent clause for the U.K.'s Online Safety Act in late 2022, initiated any alternative work to assess how local legislation could be developed to provide alternative protection for users in Jersey.	Reject. Whilst the law drafting instructions for legislative changes did not immediately follow the offer of a PEC to Jersey there was a political commitment made at the time to progress local legislation, which continues to be developed.
14	[Key Finding] In May 2025, the Minister for Sustainable Economic Development	Key finding is noted. Also observing that the panel's approach to testing is described as

	Findings	Comments
	informed the Panel that regulatory changes in the U.K. and Europe might create an “ <i>umbrella effect</i> ” for Jersey users. Specifically, if the U.K. introduced age verification for certain websites, Jersey users would likely need to comply with the U.K.’s system. However, when the Panel informally tested this assumption in July 2025, after the U.K.’s child safety provisions took effect, it was found that Jersey was not covered by the age verification changes. Therefore, children in Jersey may now face fewer barriers, compared to their counterparts in the U.K., when attempting to access content that is not considered age appropriate.	informal in nature and took place a few weeks after the legislation had gone live in the UK. Lessons continue to be learned from counterparts in other jurisdictions.
15	Jersey is a potential anomaly compared to the other Crown Dependencies of Guernsey and the Isle of Man, which both opted to request a permissive extent clause be included the U.K.’s Online Safety Act. However, the Panel was advised in May 2025 that neither of the other Crown Dependencies had ‘activated’ its permissive extent clause.	Finding is noted.
16	Ministers advised that existing legislation in Jersey may offer some protection against online harms. However, the scope of this legislation appears to be disjointed, addressing only certain types of harm and lacking comprehensive coverage of the full range of risks children and young people face in the digital environment.	Finding is noted.
17	Ministers have indicated that further legislation could be developed to enhance protections against online harms. However, concerns remain regarding the practical challenges of enforcement, particularly given Jersey’s position as a small jurisdiction. The Panel also noted the complexities of legislating independently on an issue that is inherently international in nature, where influence over global digital platforms may be limited.	Agreed. It remains unclear as to the impact of new legislation in UK and EU. Ongoing monitoring and liaison will be key to understanding what has worked across these jurisdictions. These insights should continue to inform government approaches.

	Findings	Comments
18	The Violence Against Women and Girls (VAWG) legislation currently in development offers an opportunity to address online harms. However, its scope does not specifically focus on children, which potentially leaves a gap in protections for young people in the digital environment.	Finding is noted.
19	The Panel was advised that any legislation aimed at providing protection should focus on the harm itself rather than the technology through which it occurs. A technology neutral approach ensures laws remain effective as new digital threats emerge, while technology-specific laws risk becoming outdated.	Agreed. The pace of technological innovation and change, including the progress of Artificial Intelligence, far outstrips the ability of most governments to progress legislative change. Approaches to communicate, educate and inform young people of online harms remain an important part of any preventative approach.
20	Various Government policies play a role in addressing elements of online safety and providing protection from online harm but there is not an established interconnection between them. It has been suggested that the Building a Safer Community framework could be used to coordinate work.	Finding is noted. The Minister for Children and Families (following acceptance of Recommendation 36) has agreed to chair a Ministerial Group which will be focused on safeguarding children from online harms.
21	The Department for the Economy has not had any collaboration with the Safeguarding Partnership Board in relation to their work about online harms, as its work had not been focussed on children.	Finding is noted.
22	A cross-Ministerial group was created in September / October 2024 to consider the Government of Jersey's approach to protection against online harms, however, no Chair had been appointed as of May 2025. The Panel also learned that an officer group would be established to support this work.	Finding is noted. The cross-government Ministerial and policy officer group will continue development of relevant policy and regulation in this space and provide responses to this report.
23	Internet Service Providers in Jersey cannot block content on various websites, therefore internet users in Jersey may be	Finding is noted.

	Findings	Comments
	able to access content that would be blocked by networks in the U.K.	
24	Virtual Private Networks (VPNs) and proxy internet protocol (IP) addresses create further challenges for enforcing jurisdictional boundaries on the internet as users can circumnavigate restrictions from the region they are in. In the U.K. the Online Safety Act creates obligations for platforms to prevent children bypassing safety precautions, but there is no equivalent obligation in Jersey legislation.	Finding is noted.
25	Social media and online platforms typically enforce 'terms of service' or 'community guidelines' that users must follow to maintain access and help ensure a safer, more respectful environment for everyone; however, each platform or company will define its own unique set of rules which leads to different standards across platforms. Whilst TikTok has confirmed that it has a global approach and that users in Jersey receive the same user experience as those in other jurisdictions, this is not the same for every social media or digital platform.	Finding is noted.
26	[Key Finding] The absence of government-defined standards or regulations in Jersey for platform-led content governance suggests an implicit acceptance that decisions about potentially harmful content, particularly affecting children, are determined by corporate policies rather than by local legislative oversight or public authority.	Disagree. As in many other jurisdictions, Jersey has defined certain content that is under all circumstances illegal, for example through the Protection of Children (Jersey) Law 1994.
27	Schools serve a dual role in relation to protecting children from online harms: to safeguard students and, also, educate them about how to stay safe online. The Minister for Education and Lifelong Learning also advised that schools had to work with parents and had been “drawn in” to the world of mobile phones.	Agree. An online website to support parents and young people is due to be launched in early December. A parent working group will be initiated to support further contents and scenarios on the website. The website (Digisafejerseygov.je) has been created in conjunction with Public

	Findings	Comments
		Health, NSPCC Jersey, Safeguarding Partnership and CYPES.
28	School statutory responsibilities for safeguarding are set out in Appendix 5 of the School Review Handbook, and this includes responsibilities related to online harms. School reviews under the School Review Framework are conducted every 3-4 years.	Agreed. The School Review Framework has been revised and updated in 2025 and will inform the next cycle of school evaluations.
29	The current CYPES Online Safety Policy is dated August 2021 and the Panel established that several aspects detailed within it are no longer operational practice. It was confirmed that procedures have since been updated and improved, and that the policy itself is undergoing review. The Panel was advised that a revised version will be published to align with the updates.	Noted. The Online Safety Policy has been reviewed and updated. It has been replaced by the Digital Safeguarding and Technology Use. It is being launched in schools in November 2025.
30	The Online Safety Policy and safety features such as filtering and monitoring software are only applicable to devices that are connected to the school network or wi-fi. If an individual uses data on a mobile device to access the internet, the CYPES filtering software will not apply.	Finding is noted. CYPES are currently reviewing safeguarding and filtering software in line with technological advances to safeguard children efficiently and effectivity in the future.
31	During the course of the review, the Minister for Education and Lifelong Learning announced that there would be more restrictions put in place for students' use of mobile phones within all Government provided and fee-paying schools from September 2025.	Agreed. Minister for Education and Lifelong Learning introduced restrictions on mobile phones in schools in September 2025.
32	Restrictions or bans on mobile phone use in educational settings can be a way to reduce potential risks, such as exposure to inappropriate content and excessive screen time. However, these measures do not address the root causes related to harmful content itself and may inadvertently limit students' access to educational resources and opportunities to develop essential digital skills.	Disagree. The Minister's guidance placed restrictions not a ban of mobile phone use in schools. This position acknowledged that there were some scenarios (health related) where a mobile phone was a positive factor in the school environment.

	Findings	Comments
33	Education about online safety and protection from online harms is a statutory responsibility for schools and is incorporated within the Jersey curriculum in both primary and secondary schools and some schools have also developed their own digital literacy programmes. However, there is no dedicated budget for online safety training in schools. A sum of £6,000 was allocated from the central CYPES training budget, with additional training for teachers funded directly by schools. The Minister has highlighted peer learning among staff as a valuable resource.	Finding is noted. The School Review Framework offers learning and improvement to be spread across different schools. This includes all student teaching and learning matters including digital literacy.
34	There are challenges in delivering age-appropriate and SEN-sensitive online safety education, with schools reportedly tailoring approaches to individual pupil needs.	Finding is noted. The recently published Island Special Education Needs Review (October 2025) provides an existing framework to build a commitment to safeguard this cohort of students to potential online harms.
35	The Minister for Children and Families has stated that there is no need to oversee and monitor the use of technology when attending a youth centre as the Jersey Youth Service does not currently provide any devices for children and young people to access the internet. The Panel is concerned that the absence of provided devices does not remove the duty of care owed by youth services when children are in their care.	Finding is noted. The new Digital Safeguarding and Technical Use Policy include youth club settings.
36	The CYPES Online Safety Policy does not apply to the Children's Residential Service, however, residents are provided with internet usage rules and expectations, and individual care plans and safety strategies are used to manage vulnerabilities and safeguard against online harm. The Panel was informed that Children's Services is undertaking a comprehensive policy review.	Finding is noted. The new Digital Safeguarding and Technical Use Policy includes residential care settings.
37	The Residential Service uses a system called Sophos to monitor wi-fi use and filter or block harmful content from any	Agreed.

	Findings	Comments
	device connected to the wi-fi, however, the Panel found that internet filtering software was not in place at the two Children's Short Breaks Homes. It was confirmed in May 2025 that this would be addressed and implemented at those locations in the near future.	
38	The Cyber Security (Jersey) Law is a resilience law with the purpose of ensuring the safety of the Island's digital infrastructure and providing online safety to citizens as a consequence of this. It is not a law that is designed to provide any protection for children from content on the internet.	Finding is noted.
39	In Jersey, there is legislation that makes the creation or distribution of child sexual abuse material (CSAM) a criminal offence. There is also a multi-agency strategy on Child Sexual Abuse and Exploitation (CSAE) published by the Safeguarding Partnership Board. Where CSAM is found, it can be reported to the Internet Watch Foundation who will work internationally to remove the content from the internet. There are plans to make amendments to the Sexual Offences (Jersey) Law 2018 to address non-consensual sharing of sexual images.	Finding is noted.
40	There is legislation that makes it illegal to aide, abet, counsel or procure a person's suicide, however, unlike the United Kingdom, Jersey does not have legislation that mandates online platforms or service providers to monitor or remove inappropriate digital content, including suicide related content and self-harm material, or to implement age-assurance measures for accessing certain material and the Panel has established that no work is being progressed to address this.	Finding is noted.
41	The Panel notes that within the current legislative framework, the concept of "take down requests" has predominantly been considered in the context of proposed amendments to data protection	Finding is noted. The proposed content removal legislation has two main objectives:

	Findings	Comments
	legislation. These measures are intended to tackle online harms involving personal data and are unlikely to apply to wider content reporting mechanisms, especially where the material does not directly concern the personal information of the individual making the report. In such cases, platform-specific guidelines are more likely to govern how the content is handled.	• Firstly, it will make it easier for people in Jersey to get illegal content removed from social media, websites, and search engines. • Secondly, it looks to strengthen online privacy by clearly defining what can or cannot be uploaded and lack of permission, where uploading causes harm, distress or reputational damage.
42	The Government of Jersey has committed to implementing all Violence Against Women and Girls Taskforce recommendations, including regulating online platforms (Recommendation 10). However, current efforts by the Government focus solely on removing harmful content targeting individuals, without broader measures to regulate content.	Finding is noted. The planned legislation for content removal aims to include all “illegal content”, meaning any material that breaks Jersey law - whether civil, criminal, or administrative - no matter what the topic is. Additional appropriate measures to regulate content would be explored under the gap analysis to which Recommendation 7 refers.
43	The Government of Jersey currently has no plans to introduce regulations requiring service providers to implement age-verification measures for users accessing specific online content, such as pornography. Ministers have been critical of age-verification measures. The Minister for Sustainable Economic Development has stated that requirements to provide age verification are not considered appropriate for Jersey citizens, as it involves individuals disclosing highly sensitive personal information to third parties. Additionally, it may create a misleading impression of online safety, given that age-verification measures can be easily circumvented, for instance, using a VPN.	Finding is noted.
44	Cyberstalking will be addressed within the scope of the legislation that is being	Agreed.

	Findings	Comments
	developed in response to the Violence Against Women and Girls Taskforce Report recommendations and is expected to be lodged within the existing electoral term (to June 2026).	
45	Article 51 of the Telecommunications (Jersey) Law 2002 makes the improper use of a telecommunications system an offence. However, it does not establish the same level of responsibility as the U.K.'s Online Safety Act, which places explicit duties on digital platforms, for example, to implement safeguards against harmful content, conduct regular risk assessments, and ensure systems are in place to prevent and respond to behaviours such as cyberbullying, harassment, and online abuse.	Agreed.
46	The Government of Jersey is developing a centralised database to collect data on technology-facilitated abuse, including cyberbullying, cyberstalking, non-consensual intimate image abuse, online gender-based hate speech, and cyber harassment.	Finding is noted.
47	Prosecuting against online financial harms, such as fraud, is challenging when the perpetrator is not in Jersey and is in another jurisdiction as it makes pursuing criminal action more difficult. It is unclear whether internet users in Jersey will benefit from platform design changes in other jurisdictions.	Finding is noted.
48	Minimum age requirements for information society services (e.g. social media platforms) are primarily derived from data protection legislation, rather than assessments of children's developmental readiness or online safety needs.	Finding is noted.
49	The Government of Jersey has indicated that it will develop legislation to further extend the rights of data subjects, including children. However, in order to remain aligned with the EU's GDPR	Finding is noted. As a result, the planned legislation for content removal has been drafted as a separate law. The proposed new legislation has two main objectives:

	Findings	Comments
	legislation it will not extend to individuals acting in a personal or household capacity, due to the domestic purpose exemption. As a result, data protection legislation will not adequately address the full spectrum of online harms, particularly those arising from personal content sharing or harmful behaviour between individuals online.	Firstly, it will make it easier for people in Jersey to get illegal content removed from social media, websites, and search engines. Secondly, it looks to strengthen online privacy by clearly defining what can or cannot be uploaded and without permission where it causes harm, distress or reputational damage.
50	The impact of false or misleading content, particularly when amplified by algorithms, has been found to be a risk to public safety in the U.K. In Jersey, the Minister for Sustainable Economic Development has confirmed that there are no government plans to introduce specific measures aimed at tackling misinformation online.	Finding is noted.
51	State parties should proactively consider emerging research and evidence from the public health sector to help prevent the spread of misinformation, as well as materials and services that may harm children's mental or physical health. Such action would support the Government's obligations under the United Nations Convention on the Rights of the Child (UNCRC).	Finding is noted.
52	There is a consensus that protecting children from online harm requires a societal approach, involving collaboration across multiple sectors. However, a key challenge includes defining the scope of the response, particularly whether it should be locally tailored to Jersey or aligned with international regulatory frameworks.	Finding is noted.
53	Enticing alternatives to screen time are important to encourage physical activity, creativity, and social engagement. Public Health Jersey has recommended improving access to free, inclusive activities, such as sport, arts, and community programmes, as a means to offer positive substitutes to screen time.	Finding is noted.

	Findings	Comments
54	[Key Finding] A key challenge is the lag between technological innovation and the implementation of effective safeguards for online safety. The Panel's review has gathered evidence indicating that digital platforms should bear greater responsibility for designing their services to be suitable and safe for children, including addressing addictive behaviours and identifying and flagging inappropriate online behaviour. Whilst some platforms may anticipate regulatory demands and "self-regulate" the UNCRC has made it clear that it is the role of governments to set the standards for a safe digital environment that is in the best interests of children.	Agreed. In addition to progressing legislative change, the Chief Minister and Minister for Sustainable Economic Development will be holding round table talks in December 2025 to explore how local telecommunication services can work with government to support families to protect children from online harms.
55	Ministers have expressed support for the development of an online safety strategy, and the Panel has been informed that the cross-Ministerial group intends to begin coordinating this work. However, based on current indications, the Panel understands that significant long-term action may not be initiated within the remainder of the current political term.	Finding is noted.
56	The Government of Jersey has acknowledged the significance of digital education, yet there remains a lack of clear guidance around defining digital literacy expectations. While many children are proficient in using digital devices and platforms, this competence does not automatically translate into true digital literacy.	Finding is noted.
57	Government of Jersey Ministers have indicated that they are introducing new legislation on online harms, however, the evidence presented to the Panel has largely focused on updates to existing laws and ongoing initiatives linked to data protection and the VAWG report. However, these efforts alone do not comprehensively address the wide-ranging nature of online harms.	Finding is noted.

	Findings	Comments
58	The Panel has heard that any new or updated legislation must be forward looking and that there should be regulatory alignment to enable cross-border enforcement and ensure child-specific protections. While Ministers value legislative autonomy, stakeholders including the NSPCC, Safeguarding Partnership Board, and Information Commissioner stressed that fragmented or reactive laws risk being ineffective.	Finding is noted.
59	Data protection law is critical for privacy and supporting user rights but cannot address the full spectrum of online harms. Government of Jersey Ministers have cited the importance of ensuring that Jersey's data protection laws maintain adequacy and continue to align with the EU's General Data Protection Regulation (GDPR).	Finding is noted.
60	The Minister for Sustainable Economic Development has suggested that the Jersey Office of the Information Commissioner (JOIC) could potentially lead enforcement efforts for the Government's planned online safety initiatives. However, JOIC is not presently resourced to serve as the regulator, and expanding its role would necessitate substantial investment.	Finding is noted. The Jersey Office of the Information Commissioner (JOIC) will continue to be consulted with, as a key stakeholder, during the development of the proposed content removal legislation.
61	Responsibility for the digital economy in Jersey currently sits with the Department for the Economy and the Minister for Sustainable Economic Development, while the Minister for Children and Families holds formal responsibility for coordinating policies to safeguard children and support their well-being.	Agreed. The Minister for Children and Families has within his portfolio of responsibility Children Social Care, CAMHS and Youth Services. More broadly, The Ministers named under the Children and Young People (Jersey) Law as having responsibility for Safeguarding Children include for Children and Families is one of Minister, Minister for Health and Social Services, Minister for Justice and Home Affairs and Minister for Housing.
62	Digital literacy and online safety need to be embedded into education systems and	Agreed.

	Findings	Comments
	keep up with technological change. The UNCRC has advised that equitable investment in infrastructure, teacher training, and evidence-based standards to ensure ethical and educational use of technology.	Investment is needed. Embedding digital literacy and online safety across the curriculum and keeping pace with technological change is essential. In line with UNCRC guidance, this means making equitable investments in infrastructure, providing ongoing teacher training, and adopting evidence-based standards so technology is used ethically and to enhance learning. By involving families and communities and reviewing practice regularly, education systems can support all learners while managing risks proportionately.
63	Data from the Jersey Children and Young People's Survey suggests that some young people are hesitant to report experiences of criminal or sexual exploitation. While not all such harm occurs online, the data underscores the importance of establishing clear, accessible reporting pathways and support systems to safeguard children in digital spaces.	Agreed.

RECOMMENDATIONS

	Recommendations	To	Accept/ Reject	Comments	Target date of action/ completion
1	The Government of Jersey should ensure that any further work initiatives to address risks related to online harms include clear definitions and classification of the specific types of harm being targeted. This will help to facilitate a shared understanding between different groups of stakeholders and, where applicable, support alignment across jurisdictions.	Council of Ministers (CoM)	Accept	The Minister for Children and Families and relevant Ministers on behalf of the Council of Ministers have accepted this recommendation. The definition of online harm is outlined and in the CYPES Digital Safeguarding and Technology Use Policy - Online harm refers to the risks and negative impacts that children and young people may encounter when using digital technologies and the internet. These harms are typically grouped into four key categories referred to as the 4C's: Content – Exposure to illegal, inappropriate, or harmful material. <i>Examples: pornography, self-harm content, hate speech, misinformation, radicalisation.</i> Contact – Harmful interactions with others online. <i>Examples: grooming, cyberbullying, coercion, peer pressure, impersonation.</i> Conduct – Personal online behaviour that increases the risk of harm. <i>Examples: sharing explicit images, engaging in abusive or disrespectful communication, oversharing personal information.</i> Commerce – Risks related to financial exploitation or scams. <i>Examples: phishing, online gambling, fraudulent</i>	Nov 2025

	Recommendations	To	Accept/ Reject	Comments	Target date of action/ completion
				<i>advertising, in-app purchases targeting children.</i>	
2	The Minister for Children and Families should coordinate work to assess the risks and impact of different online harms to all children and identify vulnerable groups in order to develop targeted interventions. This work would inform policy decisions and ensure that safeguarding measures are inclusive, evidence based and responsive to emerging threats.	Minister for Children and Families (MCF)	Partially Accept	The Minister for Children and Families already has existing legal powers that enable meaningful coordination of work to safeguard children against online harms. The Minister for Children and Families is a named under the Children and Young People (Jersey) Law 2022 as a Responsible Minister with safeguarding responsibilities and continues (with the support of other Ministers) to bring forward policy initiatives on this issue. Government continues to work closely with schools, social services, and safeguarding partners to assess the risks and impacts of online harms on children. This includes identifying vulnerable groups and developing targeted interventions such as tailored guidance, digital literacy programs, and monitoring tools.	Ongoing
3	The Government of Jersey should explore the development of policy and legislative guardrails to ensure the safe, ethical, and responsible use of artificial intelligence across public and private sectors. The guardrails should be designed for all users but consider special protections for children.	CoM	Partially Accept	The Minister for Children and Families and relevant Ministers on behalf of the Council of Ministers have partially accepted this recommendation. Government of Jersey published its Artificial Intelligence Policy in April 2025. An accompanying guidebook and training to assist all employees in their use of Artificial Intelligence has also been progressed. Additionally, a CYPES Generative Ai Policy for Education has also been published and clarifies the department's position on the use of AI. The policy provides evidence-based	Ongoing

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				guidelines for its application within education-based environments. This policy is due to be reviewed in Q1 of 2026. Government of Jersey will continue to work in conjunction with Jersey's AI Forum to explore the safe, ethical and responsible use of AI in public and private sectors. The gap analysis completed under key Recommendation 7 will also inform future priorities including the development of legislative guardrails for AI across Ministerial portfolios.	
4	[Key Recommendation] Policy considerations should be subject to a formal assessment of children's rights at an early stage. The Government of Jersey should evidence how it will embed this process across all departments to reflect the enduring lessons of the Independent Jersey Care Inquiry.	CoM	Partially Accept	The Minister for Children and Families and relevant Ministers on behalf of the Council of Ministers have partially accepted this recommendation The Children (Convention Rights) (Jersey) Law 2022 sets out the circumstances where Ministers and Elected Members are required to demonstrate due regard for children's rights, as set out in the UNCRC. For Ministers (individually and collectively, including Assistant Ministers and officers acting under delegated authority) the duty to have due regard already extends to the formulation of policy. Statutory Guidance published by the Minister for Children and Families (Children's Rights Scheme¹) includes guidance on the due regard duty and how this may be exercised by duty	Ongoing

¹ [Children's Rights Scheme for Jersey.pdf](#)

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				bearers outside of the formal CRIA process. Consideration of children's rights is already included in the standard policy submission template used to support ministerial policy development. It should be noted that <u>formal</u> assessment, in the form of a Children's Rights Impact Assessment (CRIA) is optional in respect of policy development	
5	The Government of Jersey should create a formal process which widens the scrutiny available to the option of a permissive extent clause prior to the decision being made. As a minimum a Ministerial decision should be required, so that the relevant Scrutiny Panel and members of the States Assembly and general public have the opportunity to raise questions.	CoM	Partially Accept	The Minister for Children and Families and relevant Ministers on behalf of the Council of Ministers have partially accepted this recommendation Current procedures are compliant with the States of Jersey Law 2005. A review of the existing administrative procedures will be undertaken to understand where decisions can be better recorded and where appropriate engagement of Scrutiny and States Assembly should be sought.	Dec 2026
6	The Government of Jersey should formally research and assess what "umbrella" effect, if any, there is for Jersey internet users from the U.K.'s Online Safety Act and the EU's Digital Services Act. Assessment findings should be published	CoM	Partially Accept	The Minister for Children and Families and relevant Ministers on behalf of the Council of Ministers have partially accepted this recommendation The Online Safety Act (2023) and EU Digital Service Act (2024) are examples of very recent legislation. The effectiveness of their intended impact and changes may take a period to fully identify. Legislative and regulatory changes in other jurisdictions continue to be	Ongoing

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	for public transparency.			followed and all learnings will inform future assessments as to the ‘umbrella’ benefits that we may expect to see in Jersey. Further work to understand the ‘umbrella effect’ will be incorporated into the legislative gap analysis (committed to under Recommendation 7).	
7	[Key Recommendation] The Government of Jersey should conduct and publish a comprehensive gap analysis of existing legislation addressing online harms, with particular attention to the range of types of harm currently covered. This analysis should also consider the absence of child-specific protections in emerging frameworks such as the VAWG legislation and reflect the enforcement challenges faced by a small jurisdiction operating in a global digital environment.	CoM	Accept	The Minister for Children and Families and relevant Ministers on behalf of the Council of Ministers have accepted this recommendation A comprehensive legislative and enforcement gap analysis to address online harms will be scoped across Ministerial portfolios, costed and delivered to help future Ministers prioritise legislative development to safeguard children from digital harms.	Dec 2026
8	The Government of Jersey should review its procedures to ensure that all Government departments are taking consideration of the impact of their work on children, as an automatic and	CoM	Reject	The Minister for Children and Families and relevant Ministers on behalf of the Council of Ministers have rejected this recommendation There are several existing ministerial mechanisms that require government to consider children in its policy development process.	

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	integrated part of the policy development process.			Ministerial Boards currently exist for Safeguarding, Housing and Community Safety. Each have the scope to address children's matters in their policy development. The Children and Young People (Jersey) Law 2022 requires Responsible Ministers to publish a Children's Plan on a four yearly basis which represents an opportunity to identify key priorities for children policy and practice. The Children's Outcome Executive Committee (COEC) meets twice a year to review the plan and monitor outcomes. The Committee is supported in its work with inputs from School Council Network, Children's Cluster, BASC and Strategic Commissioning.	
9	The Cross-Ministerial group should publish its terms of reference and provide details to scrutiny about the work it is doing to align relevant policies, data collection efforts, and governance frameworks to demonstrate that there is a coordinated approach to strategic planning and effective oversight to safeguard children and young people from online harms.	MCF	Partially Accept	The cross-Ministerial Group was established in 2024 to coordinate and communicate Minister's policy positions to the online harms scrutiny panel review. The ToR will be published following formal approval. A more detailed forward-looking plan and appropriate governance frameworks to be established following the legislative gap analysis (see Recommendation 7).	Dec 2025 Dec 2026

	Recommendations	To	Accept/ Reject	Comments	Target date of action/ completion
10	[Key Recommendation] The Minister for Sustainable Economic Development should explore and undertake a public consultation on the development of legislation that would require all on-Island internet service providers to introduce network-level filtering that is active by default and customisable by the contract holder.	Minister for Sustainable Economic Development (MSED)	Partially Accept	Parental controls are already available for use on digital devices and in digital applications. Parents can seek help on how to successfully apply these both with their network providers or through online help websites. The Minister for Sustainable Economic Development supports undertaking a wider consultation on the impact of mandating network level filtering of content. Both the changes that would be needed in Jersey's current legislative framework and the impact on the cost and services provided for Jersey contract users would need to be explored. This work would inform the legislative gap analysis committed to in Recommendation 7. In the meantime, the Minister for Sustainable Economic Development will continue to engage Island telecoms providers to ensure suitable commercial packages and customer support is available for contract holders.	Dec 2026
11	The Government of Jersey should clarify its position on legislating for online content governance, with particular emphasis on material that may be harmful to children. Doing so would signal whether the Island intends to establish its own regulatory standards or	CoM	Accept	The Minister for Children and Families and relevant Ministers on behalf of the Council of Ministers have accepted this recommendation Government remains open to initiating future legislative and regulatory change as one approach to securing children's safeguards and improving online safety. This work would be informed by the legislative gap analysis committed to in Recommendation 7.	Ongoing

	Recommendations	To	Accept/ Reject	Comments	Target date of action/ completion
	continue to rely on platform-led policies.				
12	The Minister for Education and Lifelong Learning and Minister for Children and Families should ensure the timely publication of the updated CYPES Online Safety Policy and share it with the Scrutiny Panel at the earliest opportunity to facilitate informed discussion and review. The revised Policy should explicitly address the appropriate access to online and digital content for children and young people attending school and educational settings, including the risks associated with mobile data use.	Minister for Education and Lifelong Learning (MELL) and MCF	Accept	The new policy – Digital Safeguarding and Technology was published on Monday 24th November. The purpose of the policy is to: • Create a safe environment where children and young people can learn to use digital technology responsibly and build digital resilience • Set clear responsibilities for leaders, staff, parents/carers and learners to prevent and respond to online safety incidents • Define minimum technical standards – filtering, monitoring, device security and data protection • Provide processes for reporting concerns, managing incidents and referring to external agencies where necessary • Signpost further guidance. In addition to the policy further work has been completed to mitigate the risks associated with students mobile data use whilst in school. This includes: • Schools have implemented mobile phone restrictions during the school day to reduce risks linked to unsupervised online access. • Existing filtering and monitoring software is being applied to ensure safe and age-appropriate access to digital content.	Nov 2025

	Recommendations	To	Accept/ Reject	Comments	Target date of action/ completion
				Ongoing collaboration with internal Departments, and digital safety experts to identify emerging risks and vulnerable groups, informing targeted interventions such as digital literacy programs.	
13	The Minister for Education and Lifelong Learning should evaluate whether the U.K. based online safety guidance referred to in Jersey's Keeping Children Safe in Education policy suitably reflects Jersey's regulatory environment. Given the reliance on U.K.-based resources, and the potential divergence following the U.K.'s Online Safety Act, Jersey-specific measures should be developed to maintain effective protection for internet users.	MELL	Accept	The <i>Jersey Keeping Children Safe in Education (J-KCSIE)</i> policy was updated in November 2025 to reflect the new Digital Safeguarding and Technology Use Policy and remove references to UK legislation where appropriate. While UK or other external resources may continue to be signposted as examples of good practice, the core guidance for schools will remain Jersey-specific and aligned with our regulatory environment. This ensures clarity for all education settings and maintains effective protection for internet users in Jersey.	Nov 2025
14	The Minister for Education and Lifelong Learning should engage with key stakeholders to review mobile phone policies and guidance for schools and, also, develop mechanisms to evaluate the effectiveness of the policy changes,	MELL	Accept	The Minister has been very clear on the use of mobile devices in schools in his letter to parents in June 2025. As with all policies it will be subject to review in the future.	Sept 2026

	Recommendations	To	Accept/ Reject	Comments	Target date of action/ completion
	ensuring they achieve their intended outcomes and provide meaningful protection for children in practice.				
15	The Minister for Education and Lifelong Learning should prioritise consistency in the delivery of online safety education across all schools with consideration about the suitability of funding for this statutory requirement. This includes ensuring that teacher training is standardised and aligned with the digital education strategy to provide equitable learning experiences. Additionally, particular attention should be given to the development of tailored approaches for students with Special Educational Needs.	MELL	Partially Accept	The Minister recognises the importance of consistency in online safety education and has already taken steps to address this. Schools have begun implementing enhanced online safety measures, and a dedicated officer working group, comprising representatives from both Primary and Secondary sectors, held its first meeting in early November to review and share best practice. This group will ensure alignment with the Digital Education Strategy (2022), develop standardised teacher training, and create tailored approaches for students with Special Educational Needs. Funding requirements to support these responsibilities are also being reviewed to guarantee equitable delivery across all schools.	On-going –
16	The Minister for Children and Families should ensure that any revised CYPES Online Safety Policy explicitly addresses the appropriate access to online and digital content for children and young people attending youth clubs, including the risks	MCF	Accept	The purpose of the new Digital Safeguarding and Technology Use Policy is to create safe environments where children and young people can learn to use technology responsibly and build digital resilience. This new policy already requires safeguarding within youth services to include clear expectations around online and digital access.	November 2025

	Recommendations	To	Accept/ Reject	Comments	Target date of action/ completion
	associated with mobile data use. This should be recognised as a distinct safeguarding responsibility within youth services.			It sets out responsibilities for leaders, staff, parents/carers, and learners, defines minimum technical standards (including filtering, monitoring, device security, and data protection), and provides processes for reporting concerns and managing incidents. These existing arrangements represent a proportionate and robust policy that ensures flexibility and responsiveness to the varied settings in which youth work occurs, while maintaining alignment with overarching safeguarding principles.	
17	The Minister for Children and Families should ensure that the updated policies for the Children's Services include clear provisions for online safety, with specific measures to mitigate risks associated with online harm and mobile data access for looked after children who are in the care of the Minister.	MCF	Accept	Clear provision for Digital Safeguarding and technology use in Residential Care homes has been integrated into the new Digital Safeguarding and Technology use policy was published in November. Future investment and service transformation to children's residential sector will include revising current arrangements for safeguarding children in care against digital harms.	November 2025
18	The Minister for Children and Families should amend the Protection of Children (Jersey) Law 1994 to ensure consistency in the definition of a child as any person under the age of 18. This revision should apply uniformly throughout the	MCF (MJHA to enact)	Accept	This has been raised separately by States of Jersey Police as a corollary to the work on the legislative recommendations of the Taskforce on Violence Against Women and Girls, and the Minister for Justice and Home Affairs has agreed to include this consequential amendment in the work to amend the Sexual Offences (Jersey) Law to address intimate image offences.	March 2026

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	legislation, including provisions relating to indecent photographs, so that protections explicitly extend to all individuals under 18 years of age.				
19	The Government of Jersey should develop legislation that mandates online platforms and service providers to monitor or remove inappropriate digital content, for example, content that encourages suicide or self-harm.	CoM	Accept	The Minister for Children and Families and relevant Ministers on behalf of the Council of Ministers have accepted this recommendation The Minister for Sustainable Economic Development is developing legislation to help Islanders request removal of illegal content from online platforms. An 8-week public consultation is planned for early 2026. It is expected that law drafting to commence later in 2026, depending on CoM legislative drafting priorities. Challenges will remain where content may be considered “inappropriate” but is not currently illegal in Jersey’s legislative framework.	Ongoing
20	The Ministerial Group should seek specific guidance from Public Health in order to create coordination and joint working between the ‘Connected in Hope: A strategy for Suicide Prevention in Jersey 2025-2029’ and any work that the Government progresses in relation	MCF	Partially Accept	An initial group, comprising representatives from Public Health and CYPES, has been established to explore self-harm and suicide prevention in schools. This group will now be expanded to ensure there is representation from those involved in the online harms review. Public Health is committed to continue collaborating with other Government departments to ensure a joined-up approach to addressing online harms,	Ongoing

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	to online safety, for example under the Building a Safer Community framework.			including supporting system-wide implementation of the <i>'Connected in Hope: A Strategy for Suicide Prevention in Jersey 2025–2029'</i> .	
21	The Government of Jersey should observe and evaluate age assurance measures introduced by other jurisdictions to determine their effectiveness in protecting children and consider the benefits and risks of adopting similar safeguards locally.	CoM	Partially Accept	The Ministers for Children and Families and relevant Ministers on behalf of the Council of Ministers have partially accepted this recommendation The Minister for Economic Development will continue to review the impact of changes in other jurisdictions and their effectiveness and is committed to hold a wider Island conversation in 2026. Views from Islanders will be sought on age assurance measures and the associated risks of sharing personal data and views on any other potential impacts, for example on freedom of speech. This is a fast-moving area with continuous contributions from other jurisdictions and academia and requires ongoing monitoring. These insights would inform future legislative Gap Analysis (see Recommendation 7).	Ongoing
22	The Minister for Justice and Home Affairs should review the Sexual Offences (Jersey) Law 2018 to consider whether expanding offences about misinterpretation could provide additional protection for children in Jersey, for example, to make it specific offence for an	Minister for Justice and Home Affairs (MJHA)	Partially Accept	Communication by an adult to a child for sexual purposes would already fall in one of several offences in the Sexual Offences Law regarding grooming or inciting sexual activity etc. The Minister for Justice and Home Affairs accepts that such a review should be undertaken, although there is now insufficient time remaining in this Assembly to make any necessary	November 2026

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	adult to misrepresent their age, identity, sexual orientation, sex, or gender to a minor for the purposes of facilitating communication with that minor.			changes, so this is commended to the next Minister for action within 2026.	
23	The CYPES Counter Bullying Policy should be updated to provide clear guidance for education settings on how to respond to and reduce cyberbullying, including situations that may involve potentially criminal behaviour, while recognising the importance of safeguarding children without unnecessarily criminalising them.	MELL	Partially Accept	The revised policy and supporting guidance are scheduled for review in 2026. There will be some circumstances where criminal behaviour by students in school that takes the form of cyberbullying will be responded to in conjunction with SOJP.	September 2026
24	The Government of Jersey should assess whether internet users in Jersey will benefit from platform design changes introduced in other jurisdictions to meet legal requirements, particularly those aimed at reducing manipulative design features and mitigating exposure to unsafe digital environments.	CoM	Partially Accept	The Ministers for Children and Families and relevant Ministers on behalf of the Council of Ministers have partially accepted this recommendation To be included in the scope of the legislative gap analysis (Recommendation 7). The results of this work will inform any future government policy.	Dec 2026
25	The Ministerial and Officer groups tasked with reviewing the online safety policy should give due	MCF and MELL	Partially accept	Algorithmic accelerated misinformation will be considered as part of the legislative gap analysis (see	

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	consideration to the issue of algorithmically accelerated misinformation and assess whether, and in what manner, the Government of Jersey intends to respond to this in a local context. As larger jurisdictions have acknowledged, the amplification of false or misleading content through algorithmic systems can pose a risk to public safety, or wellbeing.			Rec 7). The results of this work will inform any future government policy.	
26	[Key Recommendation] The Minister for Children and Families and Minister for Education and Lifelong Learning should engage with Public Health Jersey to explore how evidence-based guidance on screen time can be incorporated into government policy and translated into updated practical measures within education and children's services.	MCF and MELL	Partially accept	CYPES and Public Health are currently working together on evidence-based public health guidance on screentime to assist parents and children/young people. These include: - Public health guidance to parents of newborns regarding language and communication - Public health guidance at 3-year check - Advice on screentime updated within Jersey Child Measurement Programme letters to parents. - Public health advice page & research hub included in the new Digisafe website - Work is ongoing between officers at public health and the PSHE lead at Children Young People Education and Skills. Public Health is committed to continuing work with CYPES to ensure a joined-up approach to addressing online harms in Jersey.	Ongoing

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27	The Minister for Children and Families should ensure that the draft Play Strategy includes consideration of how the Government of Jersey could support initiatives that provide young people with a variety of free and inclusive alternatives to screen time.	MCF	Accept	The Play Strategy does consider the variations of play provision across the island and when referring to play space it defines it as not only fixed play equipment but also open green space, woodland, beaches, civic space etc. The Play Strategy sets out tangible actions to ensure that real-life play is positioned as a positive and productive alternative to screentime, is accessible to all, and that our communities are built with play in mind.	Dec 2025
28	The Government of Jersey should initiate policy development to explore effective legislative approaches that place greater accountability on digital platforms, ensuring their operations are guided by principles of safety and rights by design.	CoM	Reject	The Minister for Children and Families and relevant Ministers on behalf of the Council of Ministers have rejected this recommendation Future legislative change will be determined by the findings of the legislative gap analysis (see Recommendation 7)	
29	[Key Recommendation] The Government of Jersey should prioritise the development of a comprehensive online safety strategy, with a particular emphasis on safeguarding children. Such a strategy should be grounded in a rights-based framework, incorporate cross-government collaboration, be forward-looking, and capable of addressing	CoM	Partially Accept	The Minister for Children and Families and relevant Ministers on behalf of the Council of Ministers have partially accepted this recommendation As an alternative to producing a single strategy document, this government is committed to taking cross government action to reflect relevant Departmental strategies; - Communicating more effectively with children and parents as to how they can safeguard themselves against online harms. - Working more closely with industry to leverage better	Ongoing

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	current challenges while remaining adaptable to the evolving digital environment.			protections for children and families Reviewing the outcome of the legislative gap analysis and prioritising a future legislative programme (see response to Rec 7).	
30	As part of any future strategy development, the Government of Jersey should take steps to define ‘digital literacy’ and ‘digital citizenship’ and what these mean for all Islanders, in order to improve online safety and Jersey’s digital culture.	CoM	Partially Accept	The Minister for Children and Families and relevant Ministers on behalf of the Council of Ministers have partially accepted this recommendation There is no international agreement on the definition of these two terms. However, moving forward where these terms are to be used in policy development a definition will be provided, which also assist any future law drafting.	Ongoing
31	The Minister for Education and Lifelong Learning should support digital literacy for all and make efforts to embed digital literacy into any lifelong learning ambitions for the Island. This includes targeted support for adults, in order to allow them to support children's digital development.	MELL	Partially accept	Skills Jersey will deliver targeted awareness campaigns to direct lifelong learners towards free online digital skills courses, helping to build digital confidence and competence across the community. The Government’s Better Business support packages also provide opportunities for businesses to access funding to upskill their staff in line with the digital requirements of their business. A working group of Primary and Secondary practitioners supported by IOD to develop a digital skills programme for staff and children (including digital literacy) commenced in November 2025.	March 2026

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32	To shape an effective online safety strategy and understand the nature and impact of digital harms affecting children and young people, the Government of Jersey should research how children and young people engage with the internet and what they perceive as harmful within online environments.	CoM	Reject	The Minister for Children and Families and relevant Ministers on behalf of the Council of Ministers have rejected this recommendation There are robust existing mechanisms which can be used to understand young people's online experiences. These include: Every two years a young people's survey is administered by Statistics Jersey which includes several question areas about on-line safety. A BASC survey of year 8 students who are being asked to rate where in their community do they feel safe. The School Council Network has and will continue to be used as a forum to understand young people's online experiences and activity. Online safety is embedded in both the computing curriculum and PSHE lessons across all primary and secondary schools. These lessons cover key topics such as cyberbullying, privacy, and responsible online behaviour, Parents are also supported through engagement initiatives that provide guidance on managing online safety at home and navigating emerging digital challenges.	
33	The Government of Jersey's online safety strategy must reflect how any legislation will address the full spectrum of digital harms and be adaptable to emerging technologies and threats.	CoM	Partially Accept	The Minister for Children and Families and relevant Ministers on behalf of the Council of Ministers have accepted this recommendation The gap analysis (Recommendation 7) will inform this work and consideration given to delivery under the Building a Safer Community Framework, the priorities of which are	Dec 2026

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				informed by evidence and analysis of local data.	
34	Jersey must clearly distinguish between data protection and protection from other online harms in its legislative strategy, ensuring that privacy safeguards are upheld without relying solely on data protection law to address the full spectrum of online harms.	CoM	Accept	The Minister for Children and Families and relevant Ministers on behalf of the Council of Ministers have accepted this recommendation The future role of the Jersey Office of the Information Commissioner (data protection regulator) with regard to online harms will need to be considered as part of the legislative gap analysis (Recommendation 7).	Dec 2026
35	Before assigning enforcement responsibilities for online safety legislation, the Government of Jersey should conduct a formal capacity assessment of the Jersey Office of the Information Commissioner (JOIC) and ensure that any expansion of its role is matched with appropriate funding, staffing, and statutory authority. Additionally, the Government should consider alternative regulatory approaches, including potential partnerships or agreements with other jurisdictions.	CoM	Partially Accept	The Minister for Children and Families and relevant Ministers on behalf of the Council of Ministers have partially accepted this recommendation This recommendation will be considered as part of the Legislative Gap Analysis (see Recommendation 7). Conversations continue with JOIC as legislative changes and amendments are developed and will ensure impact on any required enforcement activity is reviewed.	Dec 2026

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36	Ministerial responsibility for online safety should be assigned to the Minister for Children and Families, in recognition of the importance of safeguarding and child protection within this policy area.	MCF	Accept	The Minister for Children and Families will Chair the inter-Ministerial group to help drive a proportionate and timely set of changes that help protect children from the risks of online harms. The gap analysis to which Recommendation 7 refers will inform this work.	Ongoing
37	The Minister for Education and Lifelong Learning should ensure that there is an equitable approach to online safety across schools and that investment is provided for technological infrastructure and resources that enable effective and inclusive digital education.	MELL	Partially Accept	All schools and colleges are required to adhere to the same online safety legislation and guidance. Support is offered to all schools and colleges in the event of an incident or when required. Some infrastructure investment has been provided to ensure schools are able to access technology and safely by upgrading servers and access points. A full costed plan for the technological requirements to enable equitable and effective and inclusive digital education is being developed.	Dec 2026
38	The Government should establish clear, child-friendly reporting pathways for online harm, supported by community learning initiatives that empower children, parents, and professionals to recognise and respond to exploitation. A simple, accessible system for Islanders to report harmful online	MCF and MELL	Partially Accept	The new policy – Digital Safeguarding and Technology Use was published in November. One of the policies new purposes is to provide a clear process for reporting concerns, managing incidents and referring to external agencies where necessary. The new policy is accompanied by a new government website that assists parents and children to understand and	Nov 2025

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	content, accompanied by clear guidance on what to report, where to report it, and who handles it, should be developed.			raise concerns about digital harms they may have experienced. As part of the Island Safeguarding arrangements for both children and adults there is an agreed policy and procedure for professional to report all safeguarding concerns which will be investigated and risk assessed. The government, in partnership with the NSPCC, has launched the "Be the First Filter" campaign, named by a group of local parents/carers, and jointly funded to help adults safeguard children online. Recognising that online safety is ultimately the responsibility of adults, the campaign focuses on supporting parents/carers, and professionals.	

CONCLUSION

The government welcomes the report on this important policy area and is accepting thirteen report recommendations, partially accepting twenty-two of the remaining recommendations. Three recommendations made in the report are rejected. The high number of accepted or partially accepted recommendations reflects the range of work currently being undertaken and delivered across the different Ministerial portfolios.

The government response confirms the Minister for Children and Families as the lead minister for this policy area with support from relevant Ministers and the wider Council of Ministers.

Immediately preparing a new single strategy focusing on safeguarding children from online harms is rejected due to the strength of existing arrangements already being in place.

Instead, a focus on action and delivery is prioritised to better support and education parents to navigate the risk of online harms they think work best for their child. Engagement with local telecommunication providers will be crucial to this future work and meetings are already in diaries to secure a joined-up approach.

Convening parents and telecommunication providers offer a more joined up approach that provides opportunities to compliment government activity to safeguard children effectively.

Legislative change is likely to provide part of any future policy response. Careful thought and consideration need to be given to the proposed policy intent and impact of any future legislation and how best to achieve this.

The Government accepts ‘Key Recommendation 7’ to produce a legislative gap analysis as this offers the opportunity to (i) review some of the legislation recently taken by near neighbours, (ii) understand the impact of any ‘umbrella effects’ and (iii) consider some of the unintended consequences ahead of determining any future legislative framework for Jersey.