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**Date** 30<sup>th</sup> July 2025  
**Re** Follow-up matters from the public hearing: What protection do children in Jersey have from online harms?

Dear Deputy Curtis,

Please find below our responses to the follow-up questions regarding protections for children in Jersey from online harms.

I hope that these responses, as well as our evidence given at the public hearing, are useful to the Panel in undertaking this important piece of work.

I very much look forward to the report of the Panel and wish you well with its completion.

Yours sincerely,

Dr Carmel Corrigan

**Commissioner**  
**Office of the Children's Commissioner for Jersey**



## **Follow-up matters from the public hearing: What protection do children in Jersey have from online harms?**

### **1. From your perspective, how serious are the emerging risks to children from generative AI such as deep-fakes or AI-generated child-abuse imagery and what would your advice be for addressing these areas?**

This is not an area in which we are experts, so we are not able to give advice on how the Government of Jersey should proceed in the control of AI and children's use of it.

From our limited knowledge, however, we can say that, like all online applications and platforms, generative AI has the potential to both improve children's lives and harm them. A recent article by the UNICEF Innocenti Centre clearly points to both aspects of the world of AI.<sup>1</sup> However, like all online applications, AI has developed faster than legislation, regulation and guidance on how it is used in respect of children. Antonio Guterras, the UN Secretary General, has stated that more guardrails are needed for AI. Guardrails help to secure greater privacy and security and can eliminate toxic, harmful and misleading information. Guterres argues that these guardrails are best if embedded in human rights, transparency and accountability. Some platforms, such as Snap, are already building such guardrails into their applications to curb the potential damage to children.

Guardrails can be built into AI systems, but they can also be developed at the policy and legislative level. Work in the latter two areas is in its infancy but is developing and is often linked to data collection and processing, as this is what is used to create an AI 'intimacy' with users. It is therefore reassuring that this area is being considered here.

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<sup>1</sup> [Generative AI: Risks and opportunities for children | Innocenti Global Office of Research and Foresight](#)



## **2. What safeguards would you like to see around data-driven profiling of children in Jersey?**

We are not aware of this being an issue in Jersey, but again it should be considered as part of the wider harms facing children in a digital world. All risks and harms have to be addressed if the Government is serious about keeping children safe online.

## **3. When a child experiences online abuse, what pathways currently exist for reporting and support?**

In relation to online bullying, the Government of Jersey website signposts to the Victim Support line and provides a link to Childnet (a UK-based charity) for reporting concerns or risks that has a separate section for young people.

As a part of protecting children from harms caused by online abuse and cyberbullying, the OCCJ would like to see a clear pathway and support for both children and parents in seeking a faster takedown of offending material by all platforms.

## **4. Do you think that therapeutic services in Jersey are adequately resourced to meet the needs of children affected by image-based abuse or cyber-bullying?**

This is not an area that has been brought to our attention through our Advice and Information service, neither have we carried out any work to assess this. It is, therefore, not possible to comment with any accuracy.

## **5. Should Jersey have an online-safety regulator in future?**

Jersey needs to ensure that its children are adequately protected from risks they may experience online so that they can enjoy and experience the benefits of the online world safely. Whilst we acknowledge in a small jurisdiction that presents challenges, Jersey needs to be creative in finding solutions, particularly when it comes to regulation. Given the pace of growth and development in the online environment, this may well necessitate an online regulator in the future, or a regulation agreement with the UK. All options should be considered.



**6. Can you advise the Panel what indicators will tell us, in three years' time, whether Jersey's approach to online harms is working?**

Until the agreed approach to online harms is determined, it is impossible to say that the indicators need to be.

**7. How should the Panel and wider States hold government departments and industry partners accountable for progress in making the online safer for children and young people?**

Again, this will depend on what Jersey is trying to achieve and the associated benchmarks and indicators for success will in part be determined from those conversations and decisions. From the Office's perspective respecting, protecting and fulfilling children's rights must be central to this and so using CRIA's would be a sensible way for all the stakeholders that you mentioned to be held to account as this should provide an assessment of the any impact on children's rights of any proposal, initiative or development in this space. Where children's rights are negatively impacted then consideration to the mitigation of that negative impact need to be presented.

**8. Are there any immediate legislative or policy actions you would prioritise to improve protection for children online in Jersey?**

I think the Government needs to set out what its approach is in terms of online safety. This needs to be a coherent and cross-government approach, focused on respecting, protecting and fulfilling children's rights in the digital world. Until we know what that looks like it is very difficult to identify priority areas.