



An Roinn Sláinte
Department of Health

Online Health Taskforce

Interim Report

March 2025

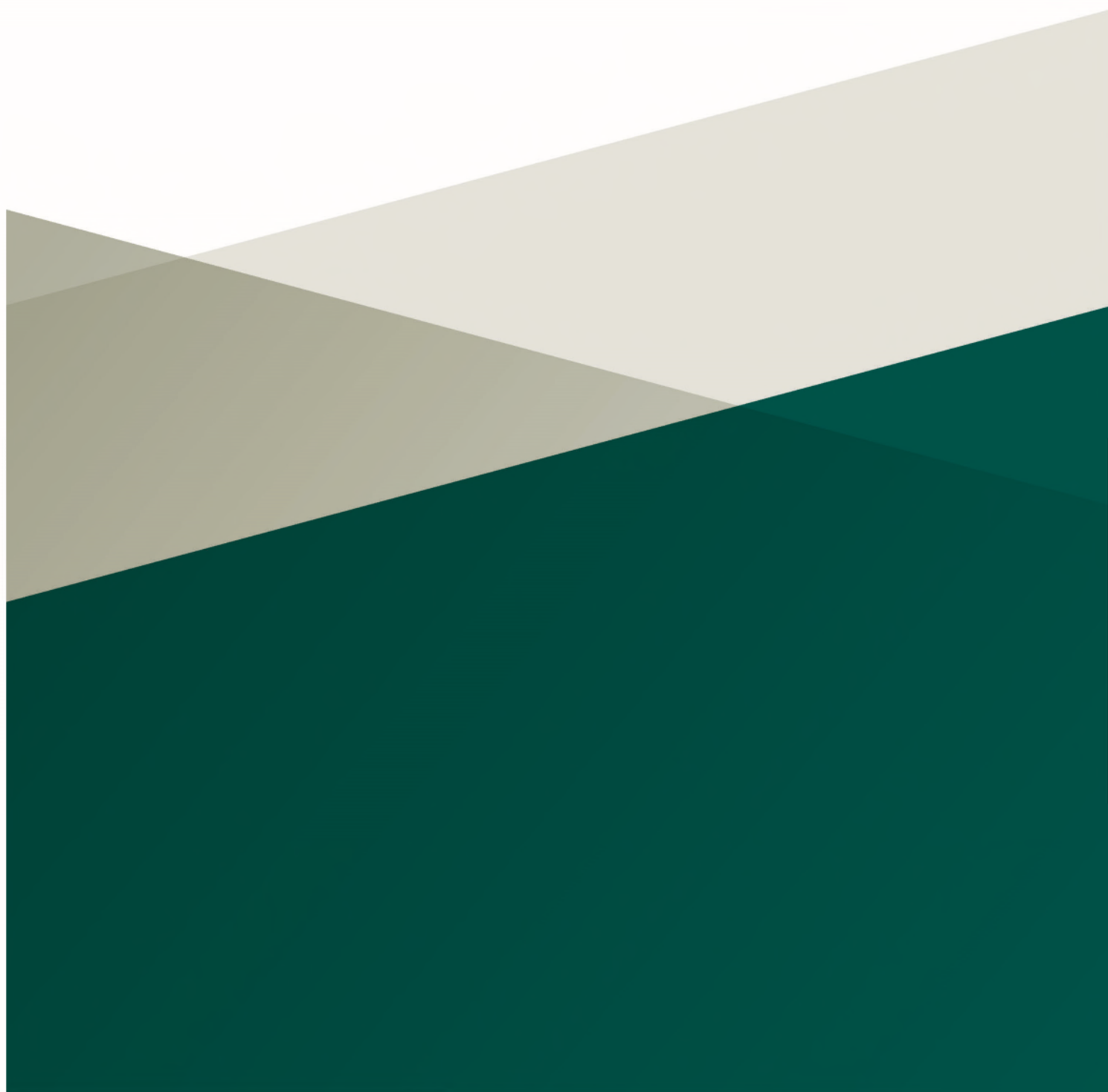




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1. Foreword from the Taskforce Chair

I am grateful to the former Minister for Health, Stephen Donnelly, for establishing this important taskforce last September and for entrusting me with its leadership. I welcome the continued commitment, demonstrated by Minister Carroll MacNeill and set out in the 2025 Programme for Government, to addressing the complex challenges of ensuring and enhancing online safety for our children and young people.

The digital landscape presents both unprecedented opportunities and significant risks for children and young people. Our taskforce has been charged with a vital national mission: to develop comprehensive strategies that protect and empower children and young people in an increasingly digital world. We are committed to bringing forward evidence-informed recommendations in our final report in October 2025.

The interconnected nature of children's and young people's experiences demands a comprehensive approach that transcends traditional boundaries between digital and physical realms. My accompanying essay, *'Rooted in Reality: Investing in Spaces to Thrive and Places to Belong for Ireland's Children and Young People' (Appendix 5.3)*, illuminates these critical dynamics, challenging us to reimagine how we support their wellbeing and development. I believe that the Minister for Health, as part of the critical role in protecting and enhancing public health, is uniquely well-placed to champion a whole-of-government approach that prioritises creating meaningful spaces and supportive environments for our children and young people.

The Taoiseach's leadership has been instrumental in elevating this critical issue, as demonstrated by the Online Safety Summit which he convened with Digital Regulators on 19 September 2024 and his follow-up meeting with stakeholders on 24 October 2024. Embracing a whole-of-government approach, we have conducted a comprehensive landscape assessment, engaging across departmental boundaries to ensure a holistic understanding of the challenges we face and the existing policy framework, implementation progress, and planned initiatives across government. I wish to acknowledge the work of the Department of the Taoiseach in coordinating this work and the Assistant Secretaries General of relevant Government Departments for facilitating the landscape assessment.

In parallel, and to aid and deepen our understanding of the complex issues around online safety, we have commissioned the Institute of Public Health (IPH) to complete a national and international research and literature review. This will detail children's exposure to



health harming products online and set out options to enhance protections. We have also engaged with the National Youth Assembly of Ireland and are grateful that they decided to dedicate one of their meetings to exploring online harms concerning children and young people. Both components will substantively inform the Taskforce’s deliberations.

Given our current timeline, we have opted for a targeted approach to stakeholder engagement. Interested parties have been invited to contribute through our dedicated online submission portal, ensuring we capture diverse perspectives efficiently.

I extend my sincere gratitude to Professor Mary Horgan, Interim Chief Medical Officer, and her dedicated secretarial team for their unwavering support and professional guidance throughout this critical endeavour.

The strength of this taskforce lies not just in individual expertise, but in our shared commitment to protecting and nurturing Ireland's young people. Each member brings a unique perspective, drawn from years of professional experience, personal passion and a deep-seated belief in the potential of our younger generation. We have approached our work with both rigour and empathy, recognising that behind every statistic and recommendation are real children and families whose lives we aim to positively impact.

Our collaborative efforts have been guided by a fundamental principle: understanding the complex digital landscape requires more than technical analysis, it demands genuine compassion, careful listening, and taking a holistic view of young people's wellbeing. As we work towards our October 2025 Final Report, we are united by a common purpose: to provide the Minister with pragmatic, evidence-informed recommendations that are ready for implementation.

A handwritten signature in blue ink, reading 'Jillian van Turnhout', is displayed above the printed name.

Jillian van Turnhout
Chair of the Online Health Taskforce



2. Overview of the Online Health Taskforce

The Online Health Taskforce was established by the Minister for Health, Stephen Donnelly, T.D., in September 2024, to develop a public health response to the harms caused to children and young people by certain types of online activity.

It was set up in recognition of a growing body of evidence from Ireland and internationally, showing the link between online activity and physical and mental health harms, including anxiety, sleep deprivation, eating disorders, self-harm and suicide ideation. Minister Donnelly noted that, while there had been several legislative actions in recent months at Irish and EU level, aimed at regulating online activity and improving safety, a comprehensive health-led approach was also required. The Taskforce has been asked to consider the range of social, mental health, physical health and sexual harms and to recommend strategic responses to address these harms. These recommendations may include national guidelines, regulation, legislation, education, awareness campaigns, as well as additional health and social care supports.

2.1. Terms of Reference

The Terms of Reference provide a clear framework and define the scope, objectives, and deliverables for the Online Health Taskforce. They are set out under the following six headings:

- Detail the range of social, mental health physical health and sexual health harms being caused to young people by certain types of online behaviours and content.
- Ensure a comprehensive approach in identifying these harms.
- Detail the range of sources of these harms.
- Provide a voice to those impacted.
- Identify gaps in protecting young people from potential harms.
- Recommend responses to address these harms.

The Terms of Reference are set out in full in Appendix 5.2.



3. Taskforce Methodology and Progress

3.1 Approach and Framework

During the first phase of its deliberations the Taskforce agreed several key principles which would guide its overall approach. These included; an emphasis on public health values; avoiding conflicts of interest; the importance of examining evidence from a diverse range of sources, including presentations from subject matter experts during meetings followed by discussions; appropriate use of workshop style meetings so that members could exchange ideas and suggestions in an open and frank manner, commissioning research by the Institute of Public Health, informed by a dedicated National Youth Assembly on online safety, and being cognisant of a whole-of-Government approach to online safety, including current initiatives and developments across Government Departments and other bodies.

3.1.1. Guiding Principles: Public Health Values

In its deliberations, the Taskforce considered its understanding of public health values, which can be summarised as follows:

- Prevention of harm, through strategies to avert the occurrence of disease, at a population level
- Protection and safeguarding populations from health threats and ensuring that communities have safe and healthy environments.
- Promotion of health education and resources to improve the health of populations through behaviour change and advocacy. It moves beyond a focus on individual behaviour towards a wide range of social and environmental interventions.
- Policy developments based on health equity and social justice in health outcomes.
- Evidence-informed decision making
- Collective responsibility and community engagement
- Transparency and accountability

In conducting its work, the Taskforce, guided by the above values, is placing particular emphasis on the following:

- Recognising that online environments shape population health outcomes
- Understanding that individual "digital choices" are constrained by broader systemic factors.



- Prioritising children and young people's wellbeing over commercial interests
- Ensuring equitable access to protective measures
- Making evidence-informed recommendations that serve the broader public good.

3.1.2. Collaborative Methodology

- The Taskforce established clear working arrangements to ensure effective communication, coordination, and collaboration amongst its members. These arrangements provide a structured framework for the work of the Taskforce.
- The Online Health Taskforce shall convene, as necessary.
- The Public Health Reform unit shall provide secretariat support to the Taskforce.
- All documentation disseminated to Taskforce members pertaining to its work and governance is strictly confidential.
- The sole exception is when further clarification is required on an agenda item. In such instances, the Chair may request or authorise the circulation of meeting documentation outside the Taskforce but within specified parameters.
- Documentation for forthcoming meetings shall be circulated no less than one week prior to said meeting.
- The Taskforce shall operate using a blended approach of in-person and online meetings.
- Members of the group may not nominate a substitute to attend in their stead.
- Taskforce members shall not disclose matters under discussion.
- Members of the Taskforce must declare any conflicts of interest to the Chair.
- The Taskforce may commission the Institute of Public Health to assist with research including a national and international literature review.
- The Chair of the Taskforce may extend invitations to expert individuals and groups to make submissions or presentations to inform the work of the Taskforce.
- The Taskforce will deliver an interim report within six months, with its final report being submitted in October 2025.



3.2. Progress Report

3.2.1. Taskforce Meetings and Workshops

The Taskforce has maintained an active schedule, convening four meetings to date, including a dynamic horizon scanning workshop where members collaboratively generated and evaluated ideas to inform future recommendations. Knowledge exchange has been central to our methodology, with members regularly inviting field experts to deliver targeted presentations on crucial topics. Beyond formal meetings, Taskforce members continuously share insights from their respective professional engagements, ensuring the group remains informed about relevant developments and emerging issues in the field. This ongoing exchange of expertise and information creates a rich collaborative environment that strengthens the Taskforce's collective understanding and approach.

Through our collaborative work and knowledge exchange, the Taskforce has identified several key areas for potential intervention. These emerging ideas and recommendations have been synthesised into six strategic categories that will form the framework for our ongoing deliberations and recommendations:

- Category 1 - Legislation/Regulation
- Category 2 - Education
- Category 3 - Information/Awareness Raising
- Category 4 - Safe Environment
- Category 5 - Rights Based Policy
- Category 6 - Research/Evidence

3.2.2. Experts' insights and evidence gathering

Inviting experts in the field to present to the Taskforce is a feature of its meetings.

The ESRI presented *“Digital technologies and social media impacts, particularly on youth mental health, and digital parenting skills, behaviours, and interventions.”*

This research is a narrative review incorporating academic and non-academic articles, illustrating that the impacts of social media are not easy to define and universal but instead are complex, nuanced, and vary from case to case. This research is pending publication.



Coimisiún na Meán (Ireland’s Media Regulator) presented “*An overview of the legislation currently in place regarding online safety.*”

This presentation outlined the Online Safety Framework, comprising the Digital Services Act, the Online Safety Code, and the Terrorist Content Online Regulation. This important framework holds digital services accountable for how they protect people, especially children, from harm online. The Online Safety Code was published in 2024, and focusses on three main areas: restricting harmful content, effective age assurance and parental controls. Part A, in effect since November 2024, sets out the legislative and regulatory context for the Code and provides for the general obligations of video sharing platform service providers. Part B, due to come into effect in July, provides for more specific obligations of providers. As part of delivering on its statutory obligations regarding media literacy, the Coimisiún has developed a suite of educational resources for secondary schools. The objective is to empower young people, as well as their parents and teachers, to discover how they can protect themselves online, including restricting harmful content.

Digital marketing of unhealthy food: The CLICKBITE study

The research was funded by Safefood. CLICKBITE is led by The Open University. Collaborators: University of Galway, UCD, Ulster University, University of Liverpool, Deakin University.

This research assessed the amplified digital marketing promotion of unhealthy food through traditionally recognised advertising strategies and new unregulated digital methods designed to manipulate children’s emotional connection to food. These include product placement, influencers, personalised algorithmic content delivery, persuasive design and other new techniques. This research is pending publication.



3.3. Pathway to Final Report

The Taskforce has developed a tailored approach to inform its final report and recommendations, drawing on multiple streams of evidence and stakeholder perspectives. This multifaceted approach will ensure our conclusions are robust, evidence-informed and reflective of diverse experiences. The following elements constitute our pathway towards delivering a thorough and impactful final report in October 2025.

3.3.1. Literature Review

The Taskforce has commissioned the Institute of Public Health (IPH) to complete a national and international research and literature review titled, *Protecting children from harms online – a report on children’s exposure to health harming products online and options to enhance protections in Ireland*. The objective of its work for the Taskforce is to develop an evidence-based understanding of what is required to enhance protections for children online.

3.3.2. Youth Engagement: The National Youth Assembly of Ireland

The National Youth Assembly of Ireland, established by the Department of Children, Equality, Disability, Integration and Youth (DCEDIY), provides a structured forum through which young people directly present their views to Government on policy matters they consider to be in the national interest.

In recognition of the critical importance of young people's perspectives on this issue, the National Youth Assembly has agreed to dedicate a special session to exploring the harms caused to children and young people by certain types of online activity. This Assembly, scheduled for July 2025, represents a significant collaborative opportunity between our Taskforce and young people themselves.

Our Taskforce is actively contributing to the preparation of the Assembly by sharing insights from our work to date, while remaining committed to preserving the independence of the young delegates' deliberations. Taskforce members will attend the concluding session of the Assembly to hear its findings and recommendations first-hand.



This collaborative approach ensures that authentic youth voices will directly inform our final report whilst also generating a standalone youth-led document. The Taskforce considers this dual-purpose engagement essential to developing recommendations that genuinely reflect the lived experiences and priorities of those most affected by online harms, our young people.

3.3.3. Stakeholder Consultation

The Taskforce has implemented a targeted approach to stakeholder engagement through the launch of a dedicated consultation process. This approach enables us to gather insights and proposals from a diverse range of stakeholders, including subject matter experts, professionals working in relevant fields, parents, and young people themselves.

The consultation template is available in English or Irish and, to ensure inclusion, can be provided in alternative accessible formats upon request. The responses will be systematically collated and analysed, with emerging themes directly informing the Taskforce's deliberations.

The Taskforce would like to express its appreciation to organisations that have actively promoted this consultation through their networks, including the Children's Rights Alliance, the National Youth Council of Ireland, The Wheel, the Institute of Public Health, the Faculty of Paediatrics at the Royal College of Physicians of Ireland and Technology Ireland. Their support has been instrumental in reaching a broad spectrum of stakeholders whose perspectives will enrich our understanding of the challenges and potential solutions in this complex area.

3.3.4. Planned work of taskforce leading to recommendations

As we advance towards our Final Report, due in October 2025, the Taskforce will build upon the foundations established in our initial phase through several complementary workstreams:

Evidence synthesis and analysis

Following the completion of the IPH literature review, the Taskforce will undertake a rigorous analysis of the findings to identify key themes and evidence gaps relevant to our terms of reference. This critical evaluation will help us to gain valuable insights from the extensive body of research and assist the Taskforce in maintaining disciplined focus on issues of strict relevance to its mandate. The overall aim is to come up with practical measures that will enhance online safety.



Collaborative expert sessions

We will convene targeted discussions with leading academics and subject matter experts from relevant disciplines to explore emerging themes in greater depth. These sessions will challenge assumptions and strengthen the evidence base for our recommendations.

Youth voice

The National Youth Assembly on Online Safety in July 2025 will provide invaluable direct input from young people. The Taskforce will carefully analyse these insights, ensuring our findings and recommendations authentically reflect young people's lived experiences and priorities.

Stakeholder submission analysis

The responses from our consultation process will be systematically analysed and evaluated to identify recurring concerns, innovative solutions, and diverse perspectives. This analysis will inform the development of practical, implementable recommendations.

Cross-departmental coordination

The Taskforce will engage with relevant government departments to ensure our developing recommendations align with existing policy frameworks while also addressing identified gaps in the current approach to online safety.

This multifaceted approach will culminate in the development of a comprehensive set of evidence-informed, implementable recommendations that balance protection from harm with the well understood benefits of the digital environment for children and young people. With a clear deadline of October 2025 for our Final Report, the Taskforce is encouraged by the prominence of digital health and wellbeing in the Programme for Government 2025, which provides a receptive policy environment for our recommendations to gain traction and implementation support across government departments and wider society.



4. Policy Landscape

This chapter outlines the current policy landscape, highlighting the interconnected nature of work across government departments and at the European level that is relevant to the work of the Taskforce.

The Taskforce has prioritised a whole-of-government approach, recognising that effective responses to online harms transcend traditional departmental boundaries. Understanding this complex policy ecosystem is essential to our work, as it ensures that our recommendations will complement and enhance existing initiatives rather than creating isolated or duplicative measures.

As we develop our final recommendations through a public health lens, the Taskforce recognises that any proposed intervention must be considered within this broader context of interconnected policies and stakeholders. This holistic understanding allows us to identify both synergies and gaps in the current framework, enabling us to craft recommendations that will strengthen the overall system of protections for children and young people online. The comprehensive mapping of these initiatives (detailed in Appendix 5.4) provides the backdrop for our evidence-informed approach to addressing online harms.

4.1 Cross Departmental Initiatives and Future Plans

Through a structured landscape assessment facilitated by the Department of the Taoiseach, we have engaged with Assistant Secretaries General across relevant departments to map existing initiatives, identify implementation-ready measures and understand planned developments.

This collaborative process has provided the Taskforce with valuable insights into the existing policy framework and planned initiatives. The Taskforce will draw upon this comprehensive understanding to develop recommendations that complement and enhance current approaches whilst addressing identified gaps. **Appendix 5.4.** details these cross-departmental initiatives.



4.1.1. Online Safety Summit

In September 2024, the then Taoiseach, Simon Harris, T.D., hosted an Online Safety Summit with Digital Regulators and the Electoral Commission to bring a collective focus across Government to online safety and to ensure effective implementation of Ireland’s new online safety framework. In attendance were the Ministers for Health; Education; Justice; Tourism, Culture, Arts, Gaeltacht, Sport, and Media; Children, Equality, Disability, Integration and Youth; Environment, Climate and Communications and Transport; Housing, Local Government and Heritage.

The purpose of this summit was to get an overview from Regulators on the digital regulatory landscape and future plans, and to hear inputs and views from Ministers reflecting their own policy area, including concerns of stakeholders. The objectives of the summit were to better protect children, to tackle the spread of misinformation and to ensure that online crime is punished.

4.1.2. Online Safety Meeting – Stakeholders

In October 2024, the then Taoiseach, Simon Harris, T.D., hosted an online safety meeting with stakeholders. This provided a high-level overview of the emerging Online Safety Framework, as well as the increasingly complex wider digital regulatory landscape and related challenges. It also summarised some ongoing sectoral initiatives, coordination structures, stakeholder engagement and communications campaigns. These engagements were an opportunity to consider this evolving landscape and Ireland’s overall approach to online safety, also to focus on how to effectively and coherently implement and enforce recent legislative and regulatory measures , many of which derive from EU regulations. It is important to acknowledge Ireland’s EU-wide role in digital regulation, and Ireland’s broader digital policy objectives as outlined in *Harnessing Digital – Ireland’s National Digital Strategy (2022)*.

As part of the Taoiseach’s Online Safety Initiative, the Chair met with the Assistant Secretaries General of relevant Government Departments. This was an awareness exercise for all involved, with a key objective of avoiding unnecessary duplication of work around online safety.



4.2 EU Presidency Focus

As one of its health priorities during its Presidency of the Council of the EU (January to June 2025), Poland is focusing on the Mental Health of Children and Adolescents in the Digital Era. It is planning to present **draft Council Conclusions on Promoting and Protecting the Mental Health of Children and Adolescents in the Digital Era** to Ministers for approval at the formal meeting of Health Ministers (EPSCO) in June 2025. Council conclusions express a political position on a topic and set out political commitments or positions which are not legally binding.

The Polish Presidency is leading discussions on the draft document at Working Party level and has also hosted high level meetings on the topic. In addition, at an informal meeting of EU Health Ministers (Warsaw, March 2025) there will be an exchange of views under two headings -

- regulations or programmes in individual member states regarding the protection and promotion of mental health of children and adolescents in the context of digital development
- how can cooperation at the European level and the European Commission's actions support Member States

The outcome of these high-level deliberations at EU level will assist the work of the Taskforce as we move towards reaching conclusions and bring forward recommendations. The Chair attended the WHO Expert Consultation on the Digital Determinants of Youth Mental Health in March 2025, on behalf of the Online Health Taskforce. The WHO Report will be presented to the Polish Presidency.



5. Appendices

5.1 Taskforce Members

Jillan van Turnhout: Chair

Noeline Blackwell: Children's Rights Alliance

Eoghan Cleary: Assistant Principal, Temple Carrig Secondary School, Greystones

Dr Abigail Collins: Consultant in Public Health Medicine and the National Clinical Lead for Child Health Public Health, HSE

Alex Cooney: Chief Executive Officer, CyberSafeKids

Professor Philip Dodd: Deputy Chief Medical Officer, Mental Health Policy Specialist, Department of Health

Brianna Faughnan: National Youth Assembly of Ireland

Professor Debbie Ging: Professor of Digital Media, Dublin City University

Rachel Harper: Principal, St Patrick's National School, Greystones

Professor Mary Horgan: Interim Chief Medical Officer, Department of Health

Donnacha Lenehan: National Youth Assembly of Ireland

Professor Peter Lunn: Research Professor, Head of the ESRI's Behavioural Research Unit

Dr Brian Mac Namee: Associate Professor, School of Computer Science, University College Dublin

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Niamh Hodnett: Online Safety Commissioner, Coimisiún na Meán attends meetings in an observer capacity.



5.2 Taskforce Terms of Reference

Terms of Reference

- 1. Detail the range of social, mental health, physical health and sexual health harms being caused to young people by certain types of online behaviours and content.** Inputs can include (but do not need to be limited to):
 - a. International and national literature review, including work being successfully done in other countries;
 - b. Expert input (e.g., clinicians, researchers, educators);
 - c. Testimony from young people, parents, health and social care workers, community workers and others as appropriate;
 - d. This phase should not include lengthy primary research, but rather be a compilation of existing research, expert input and testimony from different stakeholders.
- 2. Ensure a comprehensive approach in identifying these harms,** including:
 - a. Social (e.g., bullying, effects on social interaction);
 - b. Physical (e.g., physical activity, sleep deprivation);
 - c. Mental and emotional (e.g., self-harm, suicide ideation, eating disorders, attention, self-regulation, digital addiction, self-concept);
 - d. Sexual (e.g., sexual violence, sexual development, exposure of children to pornography and sexually explicit content);
 - e. Societal (e.g., violence against women, male supremacy, racism, extremism).
- 3. Detail the range of sources of these harms.** For example:
 - a. Devices (regardless of apps / content): Smart phones, tablets, laptops;
 - b. Online content: E.g., Promotion of self-harm / suicide / eating disorders; Pornography; Age-inappropriate suggestions, AI-generated content (e.g., on YouTube Kids); Male supremacy; Negative stereotyping based on protected characteristics (e.g., gender, race/ethnicity, religion); Violence against women; Racism and xenophobia.
 - c. Social media: E.g., Impact of algorithms; AI chat-bots; Design features (E.g., Addictive features, digital nudges, social interaction design).
- 4. Provide a voice to those impacted,** including young people and parents.



5. Identify gaps in protecting young people from potential harms. For example:

- a. Level of awareness in relevant groups of harms being caused.
- b. Availability of effective, affordable and easy-to-use technical tools available to parents / guardians including screen time and age-appropriate filters.
- c. Level of responsiveness of social media and video sharing companies to harms being caused;
- d. Level of accountability of social media and video sharing companies for the harms they are causing and/or facilitating;
- e. Level of content filtering being offered to households in Ireland by Internet Service Providers;
- f. Existing educational supports and media literacy programmes for children/young adults to help protect their development, mental health and wellbeing.
- g. Whether 13 is an appropriate age for children to have access to social media.
- h. The inadequacy of existing age verification tools.

6. Recommend responses to address these harms, including, but not limited to:

- a. National guidelines and guidance for relevant groups;
- b. Further regulation / legislation;
- c. International collaborations;
- d. Awareness measures (e.g., public campaigns, labelling);
- e. Education (for young people, parents, educators, clinicians and others);
- f. Technical solutions;
- g. Additional health and social care support; Further research.



5.3 The Chair's essay, Rooted in Reality: Spaces and Places

Jillian van Turnhout, Chair, Online Health Taskforce's Essay - Rooted in Reality: Investing in Spaces to Thrive and Places to Belong for Ireland's children and young people.

Introduction

The Online Health Taskforce (OHT) was *'set up in recognition of a growing body of evidence from Ireland and internationally, showing the link between online activity and physical and mental health harms including anxiety, sleep deprivation, eating disorders, self-harm and suicide ideation.'* Later this year, the Taskforce will propose recommendations for the Minister for Health to bring to Government for consideration. A key objective of the Taskforce is to strike an appropriate balance in its work between the benefits of online access and the persistent and, all too often, harmful targeting of children and young people.

In examining how best to address online harms, the Taskforce has consistently returned to the theme of children's offline / 'in real life' lives. The need to invest in and strengthen offline engagement opportunities for young people is not separate from – but integral to – addressing the challenges of the digital world. Below I outline the vital importance of providing and investing in offline spaces and places for children and young people across Ireland.

The evidence is clear. Irish children and young people are spending increasing amounts of time online, often at the expense of physical activity, face-to-face social interaction, and participation in organised activities. Recent findings show a worrying decline in reported happiness among children aged 10-17, from 89.7% in 2018 to just 78.5% in 2022 (Department of Children, Equality, Disability, Integration and Youth, 2024). This same period has witnessed increased screen time by this group, particularly during and following the COVID-19 pandemic, which the World Health Organization has directly linked to decreased outdoor activity and rising childhood obesity rates (WHO, 2024).

These challenges require a whole-of-government approach to invest in and revitalise the physical, cultural, and community spaces where children and young people can thrive. As we shall explore, this is not merely about providing alternatives to screen time – it is about fulfilling fundamental rights, promoting wellbeing, and building the resilience of an entire generation.



The Rights Framework: Article 31 and Beyond

The right of children to rest, leisure, play, recreational activities, and participation in cultural and artistic life is enshrined in Article 31 of the UN Convention on the Rights of the Child (UNCRC). This is not a luxury or an afterthought – it is a fundamental right.

General Comment No. 17 (2013) on Article 31 emphasises that play is essential for children's physical, mental, social, and emotional wellbeing, while leisure and cultural participation foster creativity, self-expression, and social development. However, various challenges hinder its realisation, including socioeconomic inequalities, overly structured schedules, lack of safe spaces, and discrimination based on gender, disability, poverty, or migration status.

The Irish government has recognised these rights through the adoption of frameworks like "Young Ireland: National Policy Framework for Children and Young People 2023-2028" and the "Participation of Children and Young People in Decision-Making: Action Plan 2024-2028" and previously through the "National Play Policy 2004-2008" and "National Recreation Policy" (2007). Yet the evidence suggests implementation is falling short for many young people.

Current State of Young People's Participation

Declining Happiness and Engagement

The stark decline in reported happiness among Irish children should be a cause for national concern. Even more troubling are the disparities—children with disabilities reporting the lowest levels of happiness at 71.7%, followed by immigrant children at 77.3% (Department of Children, Equality, Disability, Integration and Youth, 2024).

This correlates with declining participation in decision-making processes at school level, where only 26.8% of children reported that students participate in making school rules in 2022, down from 35.6% in 2018 (Department of Children, Equality, Disability, Integration and Youth, 2024).

Arts and Cultural Participation

Cultural engagement initiatives like Cruinniú na nÓg provide valuable opportunities, as Ireland's national day of free creativity for children and young people under 18 – notably the only event of its kind globally. However, research indicates disparities in access and participation, with evidence of embarrassment being an issue for those aged 12-19 years (Arts Council, 2022).

While Arts Council investment in children and young people's arts has grown from €3.1 million in 2019 to approximately €8.1 million in 2023, and total expenditure across the organisation reaching approximately €18 million in 2023, these figures remain modest relative to need.



Physical Activity and Sport

The Children's Sport Participation and Physical Activity (CSPPA) Study 2022 shows some positive trends, with 23% of students meeting National Physical Activity Guidelines (up from 17% in 2018). However, the majority of children still fall short of recommended activity levels. Community sport involvement has decreased among primary students to 76% from 80%, highlighting concerns about younger children's engagement (Sport Ireland, 2022).

Youth Work and Community Spaces

Youth work organisations provide crucial support for young people. The National Youth Council of Ireland (NYCI) reports that half of 18-29-year-olds report low mental health, 44% feel financially worse off than last year, and shockingly, one in five reported skipping a meal due to cost.

As one young person from Cork (age 18) powerfully stated: "Youth work is important because it is the only sector that makes a massive impact on several disadvantaged backgrounds. Such as disabled people, people with mental health issues, LGBTI+ people, people with addiction issues, people suffering abuse, people in poverty etc."

In 2023, the Joint Committee on Children, Equality, Disability, Integration and Youth recommended, in its report 'The Future of Youth Work', "increased funding for the development of places and spaces, to amplify the value of youth work in society, to aid shared learning between practitioners and to ensure that all young people have access to a safe youth work led space."

Young people need more than just information; they need personal connections and support. They benefit from having "One Good Adult" to talk to and advocate for them in a real-world setting.

Why Investing in Spaces and Places Matters

Investing in 'spaces and places' offers invaluable benefits for young people, fostering a rich and supportive environment that enhances their overall development. These environments are essential for healthy physical, mental, and social growth during formative years.

All too often, however, policies supporting children and young people are implemented in an ad-hoc, piecemeal manner. When new community spaces are developed, restrictions frequently exclude young people based on concerns they 'will mess it up.' This approach fundamentally misunderstands their developmental needs. Every community requires both structured and unstructured spaces that genuinely welcome children and young



people – places where they can connect, engage, and simply 'hang out' without judgement. Ireland needs a coherent, cross-governmental approach with sustainable investment in childhood that recognises access to appropriate spaces as essential for healthy development.

Spaces and Places provide:

- *Social Connection*: Face-to-face interactions in these spaces help build strong social skills, fostering meaningful relationships and community bonds.
- *Physical Health*: Regular physical activity in these environments promotes active lifestyles and combats health issues associated with sedentary behaviour.
- *Mental Wellbeing*: Engaging in offline activities offers stress relief and helps young people develop positive coping strategies.
- *Identity Development*: Participating in community activities helps young people explore and strengthen their sense of self and belonging.
- *Safety and Support*: Structured spaces provide young people with access to supportive adults who can offer guidance and advocacy, serving as a trusted figure they can turn to.

Significant barriers impede full participation by children and young people in youth and community activities, rooted in systemic underinvestment and unequal access. Children from marginalised backgrounds – including those from lower-income families and Traveller communities, those with disabilities, those experiencing homelessness and in Direct Provision – face the most substantial challenges. Local volunteers, critical to community engagement, struggle with insufficient funding and support. Moreover, community spaces remain largely inaccessible: school facilities typically close in the evenings or prioritise adult-focused activities.

Transportation presents another fundamental challenge, with costs, limited availability, and safety concerns particularly restricting evening activities. The digital landscape further compounds these issues, as rising online engagement displaces in-person community interactions – a trend the WHO has documented in its research on pandemic impacts on screen time and physical activity.

Pathways to Ensure a Rooted Reality for Ireland's Children and Young People

As Chair of the Online Health Taskforce, I urge the Minister for Health to engage with Cabinet colleagues to invest in spaces to thrive and places to belong for Ireland's children and young people.



Cross-Governmental Coordination

- Develop a comprehensive national strategy for children and youth spaces that integrates education, health, arts, sports, and community development.

Increased Capital Investment

- Establish a dedicated cross-departmental fund for youth spaces and facilities.
- Prioritise capital investment in the areas of highest social need.
- Incentivise local authorities to engage with spaces in communities to ‘open them up’ for children and young people organisations.

Access for All

- Develop targeted programmes to ensure all children, can access arts, community, cultural, sports, and youth work activities.
- Address transport barriers through local transport schemes specifically designed to support youth participation.

Building Community Capacity

- Fund youth-led initiatives that give young people agency in designing their own spaces.
- Support intergenerational community involvement in creating youth spaces.
- Expand the successful Creative Places model to more communities.

Conclusion

The declining happiness rates among Irish children and young people, alongside increasing concerns about mental health, should serve as a national call to action. We must recognise that online and offline wellbeing are inextricably linked, and that healthy digital citizens are developed through rich, meaningful experiences of human connection and engagement.

As one youth worker succinctly put it: "When there are not adequate services and supports for young people, youth workers are the ones holding space and walking with these young people through vulnerable times, until they can get the support they need."

I ask the Minister for Health to champion this cause within government – to advocate for a comprehensive, cross-departmental approach to investing in spaces and places for Ireland's young people. This is not merely about alternatives to screen time; it is about fulfilling rights, building communities, and securing the wellbeing of the next generation.



5.4 Cross Departmental Initiatives

Coordinated by Economic Development & Digital, Department of the Taoiseach

A. Current Framework

A.1. Department of Tourism, Culture, Arts, Gaeltacht, Sport and Media

- The Minister for Tourism, Culture, Arts, Gaeltacht, Sport and Media (D/TCAGSM) led the passage of the Online Safety and Media Regulation Act, 2022 (OSMR Act). The OSMR Act transposes the EU Audio Visual Media Services Directive (AVMSD), dissolved the Broadcasting Authority of Ireland (BAI), established Coimisiún na Meán (CnaM) and updated the policy framework for broadcasting and video on-demand services in Ireland.
- On 15 March 2023, upon commencement of the OSMR Act, CnaM was formally established as Ireland's independent online safety and media regulator. CnaM is at the heart of Ireland's emerging online safety framework, comprising three main elements: the OSMR Act, the EU Digital Services Act (DSA) and the EU Terrorist Content Online Regulation (TCOR).
- Policy responsibility for the DSA lies with the Department of Enterprise, Trade and Employment and with the Department of Justice for TCOR. CnaM is Ireland's Digital Services Coordinator (DSC) for the DSA and an EU competent authority (along with An Garda Síochána) for TCOR.
- The overall framework provides CnaM with the tools to address the root causes of harm online, including the availability of illegal and certain harmful video content and the impact of recommender systems on mental health and well-being. It also ensures coherent implementation under one roof of legislation which comes within the remit of a number of Government Departments. On 21 October 2024, under the OSMR Act, CnaM adopted a binding Online Safety Code. The code requires designated video-sharing platforms to have robust online safety protections in place such as age-verification systems, parental control systems and effective reporting mechanisms. As part of its powers, CnaM may conduct investigations of suspected non-compliance and if appropriate, impose sanctions including substantial fines of 10% of EU turnover/or €20 million, whichever is greater. The adoption of the code meant Ireland completed transposition of the AVMSD.
- The DSA is an EU Regulation that seeks to regulate online services in respect of illegal content. The European Commission leads on the regulation of designated Very Large Online Platforms (VLOPs) and Very Large Online Search Engines (VLOSEs), with the support of DSCs in each EU MS. Among other things, the



obligations applying to VLOPs and VLOSEs include requirements to complete risk assessments in relation to the exposure of children and young people to illegal and harmful online content and mitigate those risks, including by means of age-verification or age-assurance.

- TCOR is an EU regulation to ensure that online services address the misuse of their services for the dissemination of terrorist content online. In Ireland, CnaM oversees remedial measures in respect of providers which are particularly exposed to terrorist content and may impose sanctions including financial penalties up to 4% of global turnover.
- In terms of funding, on establishment, CnaM was allocated significant Exchequer funding so that it could hit the ground running but from the start of 2025, it is self-funded by levies on regulated entities.

National Counter Disinformation Strategy (NCDS)

- In its 2022 report, the Future of Media Commission called for a more coordinated and strategic approach to combat the damaging impact of disinformation on Irish society and democracy. The report included the recommendation that a national strategy be developed to achieve this.
- An independently chaired multi-stakeholder Working Group tasked with the development of the NCDS was established in February 2023 and comprised representatives from Government Departments, public bodies, industry, academia and civil society. The secretariat was provided by D/TCAGSM.
- A final draft of the Strategy has been agreed by the Working Group, and it is planned to publish in Q1 2025.

Safer Internet Centre Advisory Group

- The Irish Safer Internet Centre (SIC) is a partnership of Hotline.ie, the Irish Society for the Prevention of Cruelty to Children, the National Parents Council Primary and Webwise, which work towards a shared mission of making the internet a safer and more inclusive place for children and young people.
- The SIC is coordinated by the Department of Justice and co-funded by the EU. In line with the EU guidance underpinning the network of European Safer Internet Centres, the SIC has an Advisory Group comprising relevant national stakeholders. Co-chaired by D/TCAGSM and D/Justice, the Advisory Group aims to foster a supportive and interactive relationship between SIC members and the Government Departments and agencies represented thereon, promote alignment where appropriate between Government priorities and SIC activities, and facilitate the drawing on of the SIC members' expertise in the formulation of public policy.



A.2. Department of Justice

- As mentioned above, the Department of Justice acts as joint chair with the Department of Tourism, Culture, Arts, Gaeltacht, Sport, and Media for an advisory group for the Safer Internet Centre (SIC). Safer Internet Centres are national hubs established in Member States across Europe and in the UK, Iceland and Norway, which provide a suite of services in line with the four pillars of the European Strategy for a Better Internet for Children, namely promoting positive online experience for children; awareness and empowerment (including digital/media literacy); creating a safe environment for children; and combatting online child sexual abuse and sexual exploitation.
- The SIC is a partnership of four leading organisations (Hotline.ie, ISPCC, National Parents Council and Webwise) with a mission to make the Internet a better place for children and young people.
- The Harassment, Harmful Communications and Related Offences Act 2020 (Coco’s Law), which commenced in February 2021, created new offences, which criminalise the non-consensual distribution of, or threat to distribute intimate images (IIAs). Hotline.ie acts as a reporting channel for intimate images disseminated without consent.
- IIA reports to Hotline.ie are shared with An Garda Síochána (Garda National Protective Services Bureau) in two distinct circumstances: (i) where the intimate content constitutes Child Sexual Abuse, or (ii) where a victim/person indicates within their online report that they wish to pursue a criminal complaint. An Garda Síochána take appropriate action to secure and retain as evidence the harmful content reported, along with any readily identifiable associated evidential meta-data, from the service provider. Hotline.ie then engage with the relevant service provider to secure the removal of that content from whatever online domain it is present on.
- Following the commencement of The Harassment, Harmful Communications and Related Offences Act 2020, the Department of Justice launched and ran a campaign to raise awareness of what constituted Intimate Image Abuse and to better inform people of the new IIA offences within the act. The “Serious Consequences” campaign focused on raising awareness about the illegality of threatening to share an intimate image of another person, even if the threat is not followed through, and “The Chain of Shame” focused on the sharing of intimate images without consent. Cuan has taken over responsibility for these campaigns on behalf of the Department, following its establishment at the start of 2024.



- The DCU Observatory on Cyberbullying, Cyberhate and Online Harassment was established in 2021, and was initially funded by the Department for a period of three years. The Observatory provides up-to-date research on the contours, functions, and impacts of cyberbullying, cyberhate, and online harassment among teenagers and adults in Ireland. To date, the Observatory has carried out research on areas such as: online hate in Ireland, addressing online harms with boys and men and AI-based cyberbullying.
- A request for funding to continue the work of the Observatory is currently under review by the Department.

A.3. Department of Enterprise, Trade and Employment

- The Department of Enterprise, Trade and Employment (D/ETE) has policy responsibility for two key regulations in the EU Digital Rulebook that promote online safety: the Digital Services Act¹; and the AI Act¹. D/ETE also has policy responsibility for the Council of Europe Framework Convention on Artificial Intelligence and Human Rights, Democracy and the Rule of Law¹; and is responsible for Ireland's participation in the OECD Global Partnership on AI (GPAI)¹; as well as the National AI Strategy and supporting the work of the AI Advisory Council.

EU Digital Services Act

- The EU Digital Services Act (DSA) is an EU regulation that introduces new obligations on providers of online intermediary services, including online social media platforms. For users and consumers of online services, the DSA is designed to provide better protection of fundamental rights; more control and choice over online experiences; stronger protection of children online; and expedited removal of illegal content. The regulation has applied in full since 17 February 2024.
- The DSA places an obligation on providers to put in place notice mechanisms that allow users to notify them of the presence on their service of specific items of content that the user considers to be illegal.
- The DSA introduces specific rules for Very Large Online Platforms and Very Large Online Search Engines (VLOPs, VLOSEs), reaching more than 10% of the 450 million consumers in Europe, in view of the elevated risks they pose for the dissemination of illegal and harmful content. The European Commission has responsibility for supervising and enforcing the obligations that apply to VLOPs and VLOSEs. However, as 15 of the 25 VLOP/SEs, have their main EU establishment in Ireland, including Meta, X, Google, and Apple, Ireland has a critical, high-profile role in supporting the Commission.



- There are several ways that the DSA contributes to online safety:
 - Online platforms must provide a system to allow a consistent and easily accessible approach to flag illegal content, goods or services on their platform. They must process alerts in a timely manner – and keep the user updated.
 - Transparency and redress mechanisms in relation to content moderation.
 - Simpler terms and conditions – particularly for services directed at minors.
 - Transparency around ads – to ensure they are clearly labelled to indicate why you are seeing it, and who is placing it.
 - A ban on certain types of advertising on online platforms, e.g. based on sensitive data categories, and a complete ban on targeted advertising of children based on their personal data.
- The Digital Services Act 2024 designated Coimisiún na Meán as Ireland’s Digital Services Coordinator, the lead national competent authority for the DSA, and the Competition and Consumer Protection Commission (CCPC) as a second competent authority responsible for provisions of the DSA applying to online marketplaces.

EU AI Act

- The EU AI Act establishes a harmonised regulatory framework for AI systems developed or deployed in the EU. It is designed to provide a high level of protection to people’s health, safety, and fundamental rights and to simultaneously promote the adoption of human-centric, trustworthy AI.
- The Act is risk-based so that its provisions are targeted and proportionate – it is not a blanket instrument applying to all AI systems. Most AI systems will not incur obligations under the Act as they are low risk. This will ensure that the EU remains competitive for AI investment and innovation.
- Under the Act certain AI practices are prohibited due to the unacceptable risk they pose; and stringent conditions must be satisfied by ‘high-risk’ AI systems, by their providers, and by their deployers, in order for such systems to be placed on the market or put into use.
- The AI Act applies to recommender systems that satisfy the definition of an AI system.
- DETE also represents Ireland on the European Board for Artificial Intelligence, which was established by the Act. The Board is the centre of the EU governance structure for the AI Act.



Global Partnership on AI

- The Global Partnership on AI (GPAI) is a partnership between OECD members and 29 GPAI countries to advance an ambitious agenda for implementing human-centric, safe, secure and trustworthy artificial intelligence (AI), embodied in the principles of the OECD Recommendation on AI. GPAI's primary goal is to establish global standards and regulations for the responsible development of AI.
- It was established in 2019 by Premier Trudeau (CA) and President Macron (FR), as a voluntary forum where experts and stakeholders engaged with international partners to cooperate on specific AI projects. In July 2024, GPAI was integrated into the OECD to better align their respective work programmes and to allow for synergies.

Council of Europe Framework Convention on Artificial Intelligence

- The Council of Europe Framework Convention on Artificial Intelligence and Human Rights, Democracy and the Rule of Law is the first international, legally binding treaty designed to ensure that AI upholds common standards in human rights, democracy and the rule of law, and to minimise the risk of those rights and principles being undermined as a result of the use of AI. The treaty, which is also open to non-European countries, sets out a legal framework that covers the entire lifecycle of AI systems and addresses the risks they may pose, while promoting responsible innovation.
- The treaty covers the use of AI systems in the public sector – including companies acting on its behalf - and in the private sector. The convention offers parties two ways of complying with its principles and obligations when regulating the private sector: parties may opt to be directly obliged by the relevant convention provisions or, as an alternative, take other measures to comply with the treaty's provisions while fully respecting their international obligations regarding human rights, democracy and the rule of law. This approach is necessary because of the differences in legal systems around the world.
- In September 2024, the European Commission signed the convention on behalf of the EU.

National AI Strategy

- A Refresh of the National AI Strategy was published in November 2024. The Refresh takes account of the significant developments in AI technology and regulation since the original Strategy was published in 2021. It builds on the solid foundations in place and aims to balance innovation with proportionate regulation and trust-building measures. The Strategy sets out a whole of Government approach to putting the necessary enablers in place to underpin AI adoption in enterprise and



public services, including a supportive innovation ecosystem, a secure data and connectivity infrastructure, and policies to ensure that the workforce is prepared for the impact of AI. A key part of ensuring AI is widely adopted in the economy and society more broadly is building public trust.

AI Advisory Council

- The AI Advisory Council, comprised of leading experts from academia, industry, and civil society, was established in January 2024. The Council provides independent expert advice to government on artificial intelligence policy, with a specific focus on building public trust and promoting the development of trustworthy, person-centred AI. Its first role is providing expert guidance, insights, and recommendations in response to specific requests from government. Its second role is developing and delivering its own workplan of advice to government on issues of artificial intelligence policy, providing insights on trends, opportunities and challenges. Throughout the year, Council members engaged in hundreds of events to build confidence in the use of trustworthy AI, including media interviews, and participation in business, public and sectoral events.

A.4. The Department of Children, Equality, Disability, Integration and Youth

Children First

- Tusla, the Child and Family Agency has a statutory duty under the Child Care Act 1991 to promote the welfare of children who are not receiving adequate care and protection. In doing so, it relies heavily on individuals reporting concerns about children, in accordance with Children First: National Guidance for the Protection and Welfare of Children 2017 and the Children First Act 2015.
- The Children First Act provides for a number of key child protection measures and can be best summarised as having three key elements. The first is that the Act provides for mandatory reporting of child protection concerns by key professionals, including teachers, gardaí and health care professionals. Under the Act, mandated persons are required to report child protection concerns at or above a defined threshold to Tusla. Mandated persons are people who have contact with children and families and who, because of their qualifications, training or employment role, are in a key position to help protect children from harm. The list of mandated persons is set out in Schedule 2 of the Act.
- The second key element is that the Children First Act places specific obligations on particular organisations that provide ‘relevant services’ to children and young people, including a requirement to keep children safe from harm while they are



using the service, to carry out a risk assessment and to develop a Child Safeguarding Statement. This must set out the procedures in place to manage any risk identified, including policies and procedures on child safeguarding awareness and training and on the reporting of child protection concerns. The types of organisations to which these statutory obligations apply are set out in Schedule 1 to the Act. They include any work or activity which consists of the provision of educational, cultural, recreational or leisure or social activities to children. The onus is on organisations to examine the legislation to determine whether any aspect of their work brings them within the definition of ‘relevant services’.

- The third key element of the Children First Act was establishing the Children First Inter-Departmental Implementation Group, on which each Government Department, Tusla, the HSE and An Garda Síochána is represented, on a statutory footing. The functions of the Implementation Group include promoting compliance by Government Departments with their obligations under the Act. The Group also provides a forum for members to raise child welfare and protection issues of general concern, or with a cross-departmental or cross-sectoral dimension across the various sectors.

Online Safety Addendum 2019

- The Children First legislation and national guidance operates on the premise that it is the responsibility of everyone in society to keep children and young people safe from harm. This responsibility includes keeping children safe from harm online. As part of the Action Plan for Online Safety, in January 2019, the Department of Children and Youth Affairs published an addendum to the Children First National Guidance to include a specific reference to the need to consider online safety in the preparation of risk assessments and Child Safeguarding Statements. The addendum is available. In addition, Tusla revised its template for the completion of Child Safeguarding Statements to refer to the need to consider online risks to children if a service provides access to the internet.

Organisational and Institutional Abuse Working Group

- A joint Tusla/ DCEDIY working group on institutional and organised abuse has been established and is tasked with examining pathways to enhance and develop the Agency’s response and intervention in the areas of institutional, organisational, and organised abuse of children and young people. As part of this work, the Group has commissioned a literature review to examine international literature, social work best practice and the recommendations arising from key reports in this area. The review will identify internal and external environmental factors that facilitate or support organisational abuse and organised abuse, and this will extend to the influence of the online environment.



Children First Awareness Week

- The Children First Act 2015 provides for a number of key child protection measures, including raising awareness of child abuse and neglect, providing for reporting and management of child protection concerns and improving child protection arrangements in organisations providing services to children. DCEDIY, in collaboration with Tusla and key stakeholders across government Departments, organise and fund a biennial national media campaign (social and traditional) to raise awareness of our shared responsibilities and obligations under Children First. The campaign will run later in 2025.

Relevant legislation or regulatory measures within individual Department's remit

The Children First Act 2015

- The Act places specific obligations on particular organisations that provide 'relevant services' to children and young people, including a requirement to keep children safe from harm while they are using the service, to carry out a risk assessment and to develop a Child Safeguarding Statement (CSS). This is a written statement that sets out the service provided and the principles and procedures in place to ensure, as much as possible, that a child or young person using the service is safe from harm. The types of organisations and services to which these statutory obligations apply are set out in Schedule 1 to the Act and include early learning and care services, schools, health centres and any work or activity which involves providing educational, research, training, cultural, recreational, leisure, social or physical activities to children.
- Section 11 of the Act specifically deals with the content of the Child Safeguarding Statement. CSSs must contain a written risk assessment and a specific list of procedures in place to address issues such as the selection and recruitment of staff, provision of child protection information and training to staff, reporting of child protection concerns to Tusla and investigation of allegations against staff. The organisation must also appoint a relevant person to be the first point of contact in respect of their CSS.
- Under the Act, providers of relevant services are obliged to circulate their CSS to all staff members and to display it publicly. They must provide a copy of their CSS on request to Tusla, a parent or guardian of a child availing of the relevant service or to requesting members of the public. The Act also provides for Tusla to establish and maintain a publicly available register of non-compliance, for service providers who fail to provide a copy of their CSS to Tusla when requested to do so. As mentioned above the Online Safety addendum clarifies to organisations providing relevant services to children that they should consider the specific issue of online safety



when carrying out their risk assessment and preparing their Child Safeguarding Statement.

- Apart from the Children First Act, a number of other policy and legislative improvements have been made to child protection standards in recent years. These include the National Vetting Bureau (Children and Vulnerable Persons) Acts 2012 to 2016 and the Criminal Justice (Withholding of Information on Offences against Children and Vulnerable Persons) Act 2012, both of which fall under the remit of the Minister for Justice. This latter Act requires that any person who has information about a serious offence against a child, which may result in charges or prosecution, must report this to An Garda Síochána. Failure to do so is a criminal offence under that legislation.

Resources and funding allocated to these measures

Tusla's Children First Information and Advice Service

- Tusla is available to support anyone with child protection concerns as to how best to deal with those concerns. As part of its suite of Children First resources, Tusla has included advice on how to incorporate considerations of online safety into their Child Safeguarding resource called 'A Guide for Policy, Procedure and Practice' Published in 2024. There is also a free, online child welfare and protection e-learning module available for everyone on www.tusla.ie. This was designed by Tusla to complement the Children First Act and associated Guidance.
- The Child Safeguarding Statement Compliance Unit (CSSCU) is a dedicated Unit within Tusla set up to ensure that all providers of relevant service's Child Safeguarding Statements (CSS) are compliant with the requirements of the Children First Act 2015. The CSSCU also provide support and oversight to organisations and relevant services with a view to meeting their obligations, while maintaining the Public Register of Non-Compliance.

Child Rights Policy Unit

Young Ireland, the National Policy Framework for Children and Young People, is a whole of Government framework that envisages an Ireland that fully respects and realises the rights of all children and young people. The issues set out in Young Ireland have been identified by children and young people themselves, as well as highlighted by the UN Committee on the Rights of the Child and evidenced in the Children and Young People's Indicator Set. It sets out work to create an environment to ensure that children and young people are a central part of everyone's agenda.



Online health has been identified as a priority area in Young Ireland, with the following actions dedicated to it (while these actions are primarily the responsibility of other departments, DCEDIY has governance responsibility for the framework):

Action reference & Responsibility: Child and Youth Mental Health and Well-being Spotlight (Digital Mental Health); D/Health

Background: Digital mental health - Health supports for young people, including mental health supports, need to reflect the modern society that young people experience and the way in which they use technology and engage with social media. Digital health refers to using online or other digital technology to provide prevention and care. Some digital mental health programmes focus on promoting health and well-being and preventing ill-health, while others deliver early intervention and mental health treatment. There are numerous digital mental health programmes available, increasing individual healthcare management choices and improving access to support.

It is recognised that online safety for young people is a central concern and there is a need to focus on establishing codes that will combat cyber bullying, set up mechanisms for complaints processes, ensure that minimum standards are upheld in terms of advertising and sponsorship, promote digital citizenship among children, support digital literacy, and develop a research programme in this space.

Action: The Child and Youth Mental Health and Well-being Spotlight will monitor implementation of existing commitments to promote online safety for young people and to ensure safe use of digital mental health interventions as outlined in the Online Safety and Media Regulation Bill (2022), through the office of the Online Safety Commissioner appointed in 2023 and through national mental health policy implementation (Sharing the Vision Recommendations #2, #31)

Action reference & Responsibility: Action 60.1, Online Safety; D/TCGASM

Background: The digital environment emerged as an area of concern for parents during the public consultation, conducted during Young Ireland's development. There were concerns about inappropriate content available to children and young people, and the impact this content and social media has on mental health/anxiety. The lack of regulation of social media, poor management of online safety, and the increased risk of cyberbullying and online grooming were also causes for concern.



There is a whole of Government approach to digital regulation and child safety, in particular through the National Digital Strategy. In terms of online safety, an important strand of that strategy is the implementation of the Online Safety and Media Regulation (OSMR) Act that is led by the Department of Tourism, Culture, Arts, Gaeltacht, Sport and Media.

In March 2023, the online safety provisions of the OSMR Act were commenced and Coimisiún na Meán formally established, including with the appointment of an Online Safety Commissioner. As part of the coherent approach to digital regulation Coimisiún na Meán has regulatory functions with relevance to child safety online. As provided for under the OSMR Act, An Coimisiún will establish a Youth Advisory Committee by to provide an opportunity for children to participate and have their views heard, particularly in relation to online safety.

Action: Implement the Online Safety and Media Regulation Act, drawing from UNCRC recommendations on digital regulation

B. Implementation and Gaps

B.1. Department of Tourism, Culture, Arts, Gaeltacht, Sport and Media

- Ireland has made significant progress with the establishment of CnaM and the development of our online safety framework.
- The policy landscape grows and develops at speed as Governments, regulatory bodies and civil society deal with the challenge of keeping people safe online while protecting freedom of expression and embracing the opportunities of new technologies, such as Artificial Intelligence (AI).
- Ireland derives much of its online safety framework from EU legislation. The challenge now is to effectively implement this legislation through the framework and new elements, such as Ireland's Online Safety Code, need to be allowed to bed in. Online services seek certainty around regulatory obligations and there is growing recognition, at EU and national level, that there is a need to simplify to reduce the administrative burden and reduce potential overlaps while maintaining high standards.
- Online safety is not just a function of regulation. It requires a cross-Government approach, supporting communities and families to make well-informed choices, in relation to how and when children access the Internet, especially in relation to social media. The importance of research into the effects of social media cannot be underestimated in terms of evidence-based policy making and effective regulation.



B.2. Department of Justice

- One significant emergent challenge for online safety is the rise of generative artificial intelligence (AI). Generative AI can generate text, images, video or other data using generative models, often in response to prompts. Widespread use of generative AI is currently carried out using models such as ChatGPT for text, and models like Dall-E 2 for image generation. This by itself is not problematic however, it is inevitable that such technology will also present the criminal community with opportunities to enhance, potentially very significantly, their ability to abuse and exploit the online community.
- Specific challenges posed by criminal adoption of AI tools include AI-generated Child CSAM, fraud and social engineering, the spread of disinformation and deepfakes.
- To effectively combat AI-generated CSAM, technological solutions will need to be deployed and where necessary developed. Tools like AI classifiers and advanced digital forensic knowledge among investigators will be required. To combat AI-facilitated fraud, organisations and industries will need to develop countermeasures, which include more robust cybersecurity protocols, AI fraud detection systems, ethical AI frameworks, and legal repercussions for misuse. Identifying and combating social engineering and disinformation will necessitate training and engagement with colleagues and stakeholders in other LEAs, industry and academia.



C. Future Direction

C.1. Department of Tourism, Culture, Arts, Gaeltacht, Sport and Media

D/TCAGSM will continue to monitor the development of national, EU and international policy and legislation with an online safety relevance, including in relation to, for example, the EU Digital Identity project, as well as actively engaging with CnaM to support and promote its work as the independent online safety regulator.

- Key CnaM workstreams for 2025 include the EU Kids Online Survey and the application of Part B of the Online Safety Code, which will be fundamental in informing future areas of focus in terms of online safety and further protecting children online. In this regard, continued Government support for the requisite human resourcing at CnaM will remain important.
- There will be focus on the effectiveness of the DSA, with the designated platforms' efforts to mitigate risk expected to be closely examined.
- To note, there are also two key pieces of legislation currently being developed at EU level to combat Child Sexual Abuse Material (CSAM), contributions on which are led by D/Justice.
- Finally, in accordance with Article 33 of the AVMSD, the European Commission is required to complete an evaluation of the impact of the Directive and its added value and submit that evaluation to the European Parliament and Council by no later than 19 December 2026. D/TCAGSM will feed into that evaluation as appropriate.

C.2. Department of Justice

- On 6 February 2024, the Commission presented a proposal for a recast of the Directive 2011/93/EU to strengthen criminal law on child sexual abuse and sexual exploitation. Ireland has opted into this measure under Article 3 of Protocol 21 and is actively engaged in negotiations.
- The proposal represents an important step to ensure that all forms of sexual abuse and sexual exploitation of children, including those facilitated by technological developments, are criminalised. Other matters addressed in the new proposal relate to the criminalisation of those who run online infrastructures for the purposes of facilitating such abuse. The changes in the new recast Directive take into account the ongoing impact of technological advancement on criminality, including measures to address live streaming of child sexual abuse, the generation of synthetic CSAM through AI tools, and the role played by the dark web in propagating CSAM and in the creation of communities of offenders.



- Also under negotiation is the proposed EU Regulation laying down rules to prevent and combat child sexual abuse. The proposed Regulation seeks to establish a harmonised legal framework, which will set out the responsibilities on providers to detect, report and remove such abuse on their services. The proposal builds on the Digital Services Act, which lays down horizontal rules in relation to illegal content and complements it with provisions to address the specific challenges posed by CSAM online.

C.3. The Department of Children, Equality, Disability, Integration and Youth's

Review of Children First: National Guidance for the Protection and Welfare of Children (2017)

- In 2025, the Department will begin work on a review of Children First: National Guidance for the Protection and Welfare of Children (2017). The purpose of the review will be to make any updates needed to the National Guidance to reflect relevant developments in child protection policy and legislation since 2017. The Guidance aims to assist the public, professionals, employees and volunteers identify and report child abuse and neglect and advises how to deal with these concerns effectively. An environmental scan as part of a scoping project has commenced internally in DCEDIY and online safety is a key consideration.

Participation, Play and Recreation Unit, D/CEDIY

The National Youth Assembly of Ireland will have two sessions with Thrive Academy. This online workshop will look at Digital Awareness in a youth activist space and will cover a number of topics - online content, misinformation, spotting AI and safety in this space. It is being delivered by Thrive Academy. Approximately 50 delegates will attend.



5.5 Secretariat for Taskforce

Eddie O'Reilly, Principal Officer, Public Health Policy Unit

Brian Callaghan, Assistant Principal Officer, Public Health Policy Unit

Peter Holohan, Higher Executive Officer, Public Health Policy Unit

James Monagle, Executive Officer, Public Health Policy Unit