

Witness Name: Tracey Burke
Statement No.: 2 for Module 8
Exhibits: M08/OLWG/01 -
M08/OLWG/97
Dated: 29 July 2025

UK COVID-19 INQUIRY

WITNESS STATEMENT OF TRACEY BURKE

I provide this statement in response to a request under Rule 9 of the Inquiry Rules 2006 dated 28 April 2025 and referenced **M08-OLWG-001**.

I, Tracey Burke, will say as follows: -

1. This is my fifth statement to the Inquiry. I have previously provided a statement in Module 1 (referenced **INQ000187621**), two in Module 2B at (referenced **INQ000273937** and **INQ000347823**) and one in Module 8 (referenced **INQ000618154**). In my previous statements, I extended my sympathies to those that had lost loved ones, friends, colleagues, and neighbours during the coronavirus pandemic. In considering the questions for this statement, I have again reflected on the effects of the pandemic on children and young people and their families as well as the education workforce. I am aware that Covid-19 has cast a shadow over many children and young people as well as their families and those working in the education sector. These groups were particularly in my thoughts as I worked on this statement.

Professional background

2. Before my employment with the Welsh Government, I worked in the UK and internationally. I have been involved in regeneration and public service reform in Wales and Ireland for over 25 years and have worked for the Welsh Government, the Welsh Development Agency, the Irish Government and the UK Government as well as the European Commission and Organisation for Economic Co-operation and Development.
3. I first began working for government in 1993 as a policy evaluator for the Irish Government. Between 1997 and 2001 I worked for the Welsh Development Agency. Between 2001 and

2003 I worked in the UK Government and then returned to the Welsh Development Agency as Executive Director of Strategy Development and Director of Planning.

4. I joined the Welsh Government in 2006 as Director of Strategy and Review, Enterprise Innovation and Networks Department, and have worked in many areas since this time. Between 2008 and 2009 I was Acting Director, Infrastructure, Policy, Strategy and Corporate Services, Economy and Transport Department; 2009-2010 Director, Economic Renewal Programme, 2010-2011 as Acting Director, Operations – Economy and Transport Department; 2011 – 2012 as Acting Director, Business Enterprise, Technology and Science; from 2012 – 2015 I was Director, Strategy – Economy, Science and Transport. Between 2015 and 2017 I was Director, Strategy – Economy, Skills and Natural Resources Group.
5. In November 2017, I was appointed Director General for Education and Public Services: it was a leadership role which covered a range of government policy and the substance of my responsibilities are set out below. I had line management responsibility for the Director for Local Government, Director of Housing and Regeneration, Director for Education (primary and secondary education, but not tertiary), Director of Communities and Tackling Poverty and the Director for Digital. The Chief Inspectors for Health Inspectorate Wales and for Care Inspectorate Wales were also part of the group albeit operationally independent.
6. In April 2022, I was appointed Director General for Climate Change and Rural Affairs. This was an equally broad portfolio with line management responsibility for the Director for Transport and Digital Connectivity, Director for Climate Change, Energy and Planning, Director for Rural Affairs, Director for Environmental Sustainability, Director for Housing and Regeneration and the Chief Veterinary Officer for Wales. On 8 April 2024, the Group structures changed in the Welsh Government and my post changed to Director General for Local Government, Housing and Climate Change and Rural Affairs. My responsibilities include a range of policy areas including housing and regeneration, local government (funding and democracy), election reform, council tax and non-domestic rates, climate change, animal health, environment and rural affairs. I have line management responsibilities for the Director of Housing and Regeneration, the Chief Veterinary Officer, the Director of Environmental Sustainability, the Director of Rural Affairs, the Director of Finance and Operations and the Director of Local Government.

7. I have also held other roles such as Chair of the Tax Policy Co-ordination Group, Chair of the Welsh Government's Committee for Strategic Investment and I remain a Senior Sponsor for the Women Together staff network.

Context

8. This statement is a corporate statement on behalf of the Welsh Government outlining its responsibilities and actions taken during the pandemic in relation to children and young people's access to and use of the internet, social media and online resources, which the Inquiry has referred to as their 'online lives'. I understand that a corporate statement on behalf of the Health and Social Services Group and the Economy, Skills and Natural Resources Group has been provided to the Inquiry for Module 8, in addition to a statement I have provided on behalf of the Education and Public Services Group. These statements should be read alongside this one and other evidence submitted by the Welsh Government in this Module to gain a more detailed understanding of the Welsh Government's knowledge and work related to the 'online lives' of children and young people during the pandemic.
9. Although this statement attempts to answer all the detailed questions in the Rule 9 request, some of the information that is relevant to an answer is not available to the Welsh Government as it relates to an area reserved to the UK Parliament, namely internet services. For example, the Inquiry specifically asked about the rates, types and impact of harm as defined by the Online Safety Act 2023. The Welsh Government does not have this data about Wales: it is held by the UK Government. It is, therefore, not possible to answer the question in any detail. The Welsh Government was also unable to put measures in place to mitigate against any harmful impact to children and young people by such harms (as defined) as a result. The Welsh Government did, however, work closely across devolved policy areas to ensure the objectives of the Act were supported, for example through education resources (further detail is provided later in the statement).

Part A – Roles and responsibilities of the Welsh Government

10. Some of the areas identified by the inquiry do not all sit in any one Group or Directorate in the Welsh Government. Although the Education and Public Services Group had certain responsibilities which related to children and young people (such as education, schools, and child poverty), they intersected at various points with those of the Health and Social Services Group (which included the physical and mental health of children, children services, child protection and safeguarding).

11. For that practical reason, this statement covers some aspects which are completely within my knowledge, aspects I was aware of but not involved in and matters which are completely outside my knowledge. In relation to the last of these, I have attempted to provide answers which are based on consultation with others in the Welsh Government and my consideration of the relevant contemporaneous documents.

12. I have relied on advice and information from members of the Senior Civil Service, including:

- a. Mike Jones, Deputy Director, Digital Learning from November 2021 to April 2024, now Deputy Director, Schools Digital Service Division
- b. Nicola Edwards, Deputy Director, Early Years, Childcare and Play Division. Remained in post during the specified period.
- c. Kevin Palmer Deputy Director, Pedagogy Leadership and Professional Learning. Remained in post during the specified period.

Welsh Ministers

13. The relevant Welsh Ministers in respect of the areas identified by the Inquiry during the specified period (1 January 2020 – 28 June 2022) were:

- a. Vaughan Gething MS - Minister for Health and Social Services from May 2016 to May 2021;
- b. Eluned Morgan MS - Minister for Mental Health, Well-being and the Welsh Language from October 2020 to May 2021 and subsequently the Minister for Health and Social Services from May 2021 to August 2024. Now the First Minister;
- c. Julie Morgan MS – Deputy Minister for Health and Social Services, from December 2018 to May 2021. Deputy Minister for Social Services May 2021 – March 2024. Minister for Children and Social Care in September 2024;
- d. Kirsty Williams MS – Minister for Education from May 2016 until May 2021;
- e. Jeremy Miles MS – Minister for Education and Welsh Language from May 2021 to March 2024;
- f. Julie James MS - Minister and Deputy Minister for Housing and Local Government responsibilities as at February 2020 (responsibilities for digital inclusion); and
- g. Jane Hutt MS - Deputy Minister and Chief Whip from December 2018 to May 2021. Minister for Social Justice from May 2021 to March 2024. She is now the Cabinet Secretary for Social Justice.

14. In March 2024, ministerial Cabinet positions were renamed 'Cabinet Secretaries', for example, 'Cabinet Secretary for Health and Social Care' and 'Cabinet Secretary for Education'. As this change happened after the Inquiry's specified period, I shall refer to the positions as named during that period.
15. Ministerial portfolio responsibilities for the specified period as of January 2019, February 2020, October 2020, and October 2021 are exhibited as **M08/OLWG/01 - INQ000116485**, **M08/OLWG/02 - INQ000066139**, **M08/OLWG/03 - INQ000066140**, and **M08/OLWG/04 - INQ000066053**.

Special Advisors

16. The relevant special advisors and specialist policy advisors during the specified period were;
- a. Tom Woodward - Special advisor for education;
 - b. Clare Jenkins – Special advisor for health; Dewi Knight – Specialist policy advisor for education;
 - c. Dewi Knight – Specialist policy advisor for education;
 - d. Jonathan Scourfield - Specialist policy advisor for children and childcare, and acted as a specialist policy advisor to the Deputy Minister for Health and Social Services on matters relating to Social Services until May 2021;
 - e. Andrew Pithouse – Specialist policy advisor on matters relating to Social Services to the Deputy Minister for Health and Social Services from May 2020 to May 2021 and
 - f. Ian Butler – Special advisor supporting childcare from May 2021 to the end of the specified period;

Extent to which responsibility of the areas listed below are devolved to the Welsh Government or reserved to the UK Parliament

17. The inquiry have asked for an explanation of the extent to which responsibility is devolved to the Welsh Government or reserved to the UK Parliament for the following areas:
- a. Risk of exploitation and grooming;

- b. Changes to reporting mechanisms or the increase in opportunities for perpetrators to access children and Child Sexual Abuse Material;
- c. Access and/or exposure to Harms;
- d. Physical health;
- e. Educational development;
- f. Social development; and
- g. Mental health and wellbeing

18. In responding below it is important to note that in relation to children and young people's online lives there is a significant overlap of devolved and reserved areas of responsibility. For example, broad areas such as internet services, communications and the prevention, detection and investigation of crime are reserved to the UK Government. The purpose of this statement is not to go into the detail of the Welsh settlement and, therefore, I have sought to summarise responsibilities in the most simple and straightforward way possible, but in doing so the intricacies of the devolved settlement should not be disregarded.

Risk of exploitation and grooming

19. There are limitations on the Welsh Government's legislative powers in this area. For example, 'Crime, public order and policing' is reserved to the UK Parliament alongside 'the prevention and detection of crime.' This means that only the UK Government can introduce legislation that relates to policing and the creation of new non-devolved criminal offences. Therefore, the Welsh Government has no responsibility for the policing or prevention of criminal activity in this area.

20. However, by its very nature, the safeguarding of children and young people in Wales requires that public services, both devolved and non-devolved, work closely together to effectively protect children and young people in society.

21. Relevant non-devolved (reserved) bodies include the probation services in Wales, youth offending teams in Wales, Police and Crime Commissioners and the Chief Officer of Police for a police area in Wales, the British Transport Police Authority, the National Crime Agency, the governor of a prison or secure training centre in Wales and the principal of a secure college in Wales.

22. Therefore, the risk of child exploitation and grooming is not an area that the Welsh Government has complete policy responsibility for.

23. Statutory responsibilities for child protection and safeguarding are vested in local authorities under the Social Services and Well-being (Wales) Act 2014 ('The 2014 Act'), as supplemented by regulations, statutory guidance and codes of practice made under that Act. Social services are provided by the 22 Welsh local authorities as detailed in exhibit **M08/OLWG/05 - INQ000083226**.
24. The 2014 Act came into force on 6 April 2016. Part 7 deals with 'safeguarding' and introduced the National Independent Safeguarding Board Wales and across Wales, a network of regional safeguarding boards.
25. The function of safeguarding children boards is to protect children within its area who are experiencing, or are at risk of, abuse, neglect or other kinds of harm, and to prevent children within its area from becoming at risk of abuse, neglect or other kinds of harm.
26. Under the 2014 Act, if local authority partners (defined as a youth offending team, local policing body, Secretary of State, providers of probation services, local health boards, an NHS Trust providing services in the area of the authority and the Welsh Ministers) have reasonable cause to suspect that a child is a child at risk and appears to be within the authority's area, they have a duty to report this to the local authority.
27. Safeguarding and child protection is largely devolved to the Welsh Government and is the responsibility of the Social Services and Integration Directorate within the Health and Social Services Group. The risk of child exploitation and grooming falls within the wider policy area referred to as safeguarding and child protection and has rested within the following areas of Ministerial responsibility:
- a. The Minister for Education's responsibilities as of February 2020 included safeguarding and inclusion in schools. From May 2021, the Minister for Education and Welsh Language roles and responsibilities included, safeguarding and inclusion in schools, including internet safety;
 - b. The Minister for Health and Social Services was responsible for safeguarding throughout the specified period; and
 - c. The Deputy Minister and Chief Whip's responsibilities included community safety, gender-based violence and sexual violence, relations with the Police and Crime Commissioners, police and other criminal justice agencies, civil contingencies, resilience and counter-terrorism issues.

Changes to reporting mechanisms or the increase in opportunities for perpetrators to access children (including child sexual exploitation and abuse and child sexual abuse material, and access and exposure to harms)

28. The areas under this heading refer to the reporting mechanisms established under, and the harms as defined by, the Online Safety Act 2023.

29. These areas do not fall within the ministerial responsibilities of one of the Welsh Ministers directly. The Online Safety Act 2023 provided new powers to the Office of Communications (“Ofcom”), establishing it as the online safety regulator. This role includes overseeing and enforcing the new regulatory regime across the UK. Ofcom is the independent regulator for communications in the United Kingdom and the regulation of internet services is a matter reserved to the UK Parliament. The Welsh Government does not have policy responsibility for the Online Safety Act 2023. However, education services in Wales seek wherever possible to support and further the objectives of the Online Safety Act to educate and keep children and young people safe online. This is delivered through the Hwb Keeping Safe Online platform. Hwb is a bilingual collection of online content, tools and services created by the Welsh Government for every student in maintained schools and provides centrally funded applications and software, virtual classrooms, and a vast repository of resources for use in the classroom or online with students. The role of Hwb is further illustrated below throughout paragraphs 94-131.

30. As set out above the Welsh Government has responsibility for determining the mechanisms for reporting, to local authorities, suspected abuse of children and young people. Such reports are then considered and assessed by the relevant local authority social services team.

31. The Welsh Government does not have devolved responsibility for monitoring or preventing online child sexualisation and abuse.

Physical health and mental health and wellbeing

32. Health services are almost entirely devolved in Wales, which means the Welsh Government has primary responsibility for the National Health Service in Wales. Mental health and wellbeing is also devolved with the exception of the subject matter of the Mental Capacity Act 2005 which is reserved to the UK Parliament.

33. The Welsh Ministers set the high-level policy framework and targets for the health service, which are then delivered by the seven Local Health Boards and three NHS trusts in Wales.

Local health boards are responsible for planning and delivering NHS services in their areas. These health services include dental, optical and pharmacy services and mental health. They are also responsible for improving physical and mental health outcomes, promoting wellbeing, reducing health inequalities across their population and commissioning services from other organisations to meet the needs of their residents.

34. A small number of areas relating to health are still dealt with at a UK level. These include the regulation of medicines, genetics, fertilisation and embryology.
35. NHS Mental Health Services for under 18s in Wales are the responsibility of local health boards. Service provision includes local primary mental health support services, specialist child and adolescent mental health services, crisis services and community mental health teams.
36. The Welsh Health Specialised Services Committee is responsible for commissioning in-patient provision for Child and Adolescent Mental Health Services on behalf of the seven local health boards.
37. Recognising the importance of supporting students emotional and mental wellbeing during the Covid-19 restrictions, the Welsh Government supported the development of online resources including a Hwb based resource – the Young Person’s Mental Health Toolkit. Designed for 11 to 25-year-olds and exhibited at **M08/OLWG/06 - INQ000611602**, it contained six playlists to signpost children and young people to a wide range of online resources to support them during the Covid-19 restrictions and beyond. In each playlist, there are self-help websites, apps, helplines, and more to support mental health and wellbeing. In addition, in April 2020 the Welsh Government announced an extra £1.25 million of funding to strengthen the delivery of school counselling services to support children and young people’s mental health during the crisis and to ensure that services were prepared for the anticipated increase in demand and that services could be offered remotely while schools were closed.
38. Throughout the specified period, health was the responsibility of the Minister for Health and Social Services. Between January 2020 and October 2020 this also included mental health.
39. In October 2020, a new Cabinet post was created, namely that of Minister for Mental Health, Well-being and the Welsh Language. Eluned Morgan MS was appointed to this role. This post was created to allow the Minister for Health and Social Services to concentrate on the response to the Covid-19 pandemic and NHS delivery and

performance. The new Minister's portfolio recognised the impact of Covid-19 on people's mental health and well-being and included responsibility for mental health services and health improvement and well-being services.

40. Between May 2021 and October 2021 mental health services returned to the portfolio of the Minister of Health and Social Services.
41. From October 2021 to the end of the specified period, the portfolio for the Minister of Health and Social Services was effectively unchanged. This position continued to be held by Eluned Morgan MS until the end of the relevant period. Julie Morgan also continued in the role of Deputy Minister for Social Services.

Educational development

42. Responsibility for education and childcare in Wales has been devolved since the start of devolution in 1999. Specifically, the Welsh Ministers have policy responsibility for children and education in childcare, primary education, secondary education, further education and higher education, as well as work-based learning and training.
43. There is considerable Welsh legislation in this field, including, for example, the Curriculum and Assessment (Wales) Act 2021, the Additional Learning Needs and Education Tribunal (Wales) Act 2018 and the Higher Education (Wales) Act 2015. A wide range of executive powers are conferred upon the Welsh Ministers in the education field, either under both Welsh primary legislation, and primary legislation passed by the UK Parliament.
44. The Education Act 1996 ("the 1996 Act") remains the consolidating Act for much of the earlier legislation in England and Wales in relation to education provision in Wales. All children should receive full-time compulsory education between the ages of 5 and 16. The 1996 Act defines three main stages of education:
 - a. Primary education, usually from the ages of 5 to 11;
 - b. Secondary education, usually provided between the ages of 11 and 16 (although can extend to 19 for schools with sixth forms); and
 - c. Further education, education for those who are over compulsory school age.
45. Other stages of education include nursery education (usually for 3–4-year-olds) and higher education.
46. Further education covers both the statutory further education sector, namely 'institutions within the further education sector' within the meaning of section 91(3) of the Further and

Higher Education Act 1992 and also any provider of post-16 education or training in respect of which funding is provided by, or under arrangements made by the Welsh Ministers, or a local authority. This includes, for example, apprenticeships and employability programmes delivered by organisations including independent training providers, and adult learning in the community delivered by local authorities.

47. Under the Higher Education (Wales) Act 2015, the Welsh Ministers' powers essentially relate to their relationship with the Higher Education Funding Council for Wales, which in turn regulates certain higher education providers in Wales. This means that the Welsh Ministers do not generally have a direct relationship with higher education providers themselves. In large part, this is because of the long-standing principle of the institutional autonomy of universities.

48. Throughout the specified period, the area of 'educational development' was the responsibility of the Minister for Education, the portfolio included responsibility for safeguarding and inclusion in schools. From May 2021, the responsibilities of the Minister for Education and Welsh Language included safeguarding, inclusion in schools and internet safety.

Social development

49. Social development in respect of children and young people is a devolved area, and the social development of children and young people as a policy area is not the responsibility of one specific Ministerial portfolio, group or directorate. The portfolio responsibilities of the Ministers for Health, Education, Communities and Tackling Poverty and Housing would all have an interest to ensure that the policies taken forward by their officials in the Education and Public Services Group and the Social Services and Integration Directorate to develop policy to support the health development of children and young people in Wales.

50. The Education Directorate in the Education and Public Services Group leads on the provision of materials for children and young people in education whilst the Health and Social Services Group and Communities and Tackling Poverty Directorate lead on the provision of support for families and carers of children to support social development.

51. The Communities and Tackling Poverties Directorate in the Education and Public Services Group had responsibility for childcare, play and Flying Start (a targeted early years programme) provision.

Responsibilities held by Welsh Government

Children's access to technology

52. In terms of children's access to technology, including the ability of children to access devices, access to and use of the internet and social media in schools, the Welsh Government, specifically the Education and Public Services Group, is responsible for the provision of advice, guidance and support to local authorities and in turn, to schools. However, responsibility and accountability of how devices are distributed, and what is accessed with the school premise is the responsibility of the local authority and the school governing body.
53. During the pandemic the Welsh Government led a programme of work and provided funding to support local authorities to purchase devices to assist digitally excluded students. However, responsibility for how devices were used in schools rested with the school / local authorities. There are varying local operating procedures within the local authorities. For example, some local authorities provide a fully managed IT support service to schools and are responsible for managing their school's device estate and in some local authorities where a core IT support service only is provided, schools determine the management of the devices with their third-party supplier. Parents and carers remained responsible for the use of devices in the home.
54. In addition to the above, the Education Directorate (part of the Education and Public Services Group) considered the use of the internet and social media in its work on the curriculum (further detail on this is set out later in the statement). In light of their respective areas of responsibility for the well being of children and young people, the Education Directorate worked closely with the Health and Social Services Group.
55. The Welsh Government sought to reduce the impact of school closures and repurposing on learning, progress and wellbeing, by supporting remote learning. This involved making sure appropriate devices were available to enable students to access online learning and resources. The Continuity of Learning Plan for the provision of remote learning, exhibited at **M08/OLWG/07 - INQ000534361**, sought to ensure that no student was disadvantaged because of a lack of access to technology or because of where they lived, their age, their Special Educational Needs, the language of their school or their socio-economic circumstances.
56. As mentioned above in paragraph 53, the Welsh Government allocated funding for laptops, MiFi connectivity devices, software licences and headsets to ensure that students

could access online and partly in-person and partly remote teaching. The Ministerial Advice submitted to the Minister for Education, Minister for Economy, Transport and North Wales and the Minister for Finance and Trefnydd is exhibited at **M08/OLWG/08 - INQ000145403**. By the end of June 2020, local authorities had used the funding to provide 10,848 MiFi devices and 9,717 software licences across Wales. This was included in the Welsh Government's '*Device and connectivity update for digitally excluded learners during coronavirus (Covid-19)*', on 29 June 2020 and exhibit **M08/OLWG/09 - INQ000615675** refers.

Children's wellbeing in connection with technology (including their mental health and development)

57. As stated above, the Education Directorate has a responsibility to support local authorities through providing advice, guidance and support, which would include children's wellbeing in connection with technology, however local authorities are ultimately responsible for the provision of education in their schools, alongside the school governing body. The wellbeing of children and young people generally and their mental health falls within the responsibility of the Health and Social Services Group.

58. As such, harm caused or issues affecting the well-being of children and young people resulting from the use of devices, social media and online resources, was a concern of the Health and Social Services Group and accordingly throughout the pandemic, the group worked closely with the Education Directorate within the existing cross departmental Safeguarding, Violence Against Women, Domestic Abuse and Sexual Violence and Adverse Childhood Experiences forum, which was chaired by the Safeguarding and Advocacy Team. .

Children's online safety

59. The regulation of internet services is the responsibility of the UK Government. The Education and Public Services Group however had responsibility for providing advice and guidance to schools on online safety, cyber resilience and data protection. In response to the evolving digital landscape and the risks associated to online safety, including findings from industry, such as the children's Media Lives research, the Digital Resilience team in the Education and Public Services Group was established in 2017. The team are responsible for raising awareness and supporting digital resilience activities including online safety, cyber security and data protection with local authorities and schools in Wales.

60. The Welsh Government is committed to actively providing guidance and updates through the Keeping Safe Online area on the Hwb website to support schools and practitioners to help keep students safe.
61. The Welsh Government is responsible for the delivery of the national Hwb platform which is designed specifically for children and young people to use in an education context. The Welsh Government works closely with global leading technology providers and expert organisations to ensure that the Hwb services are rigorously tested and comply with the latest security and data protection practices, standards and regulations.

Senior Civil Servants

62. Organograms representing the organisational structure in the Welsh Government at significant points before and during the pandemic period are provided as exhibits to this statement:
- a. The structure in November 2019, representing the structure prior to the pandemic, is set out in exhibit **M08/OLWG/10 - INQ000116483**;
 - b. In Organogram 2 exhibited at **M08/OLWG/11 - INQ000116524**, dated January 2021, and Organogram 3 exhibited at **M08/OLWG/12 - INQ000083229**, dated June 2021, the structural changes which took account of the pandemic are set out – including the introduction of the role of Deputy Director General for Health and Social Services Group, Head of Health and Social Services Group, and the Director of Vaccines; and
 - c. Organogram 4 exhibited at **M08/OLWG/13 - INQ000066126** dated May 2022, highlights the change of Permanent Secretary from November 2021 and the resulting change of Director General of the Health and Social Services Group with Judith Paget's appointment in November 2021.

Health and Social Services Group officials

63. The relevant principal officials in the Health and Social Services Group at Director level are outlined in the organograms for 2019 – 2021 specified above. For the sake of completeness, in March 2024 the Group structures within the Welsh Government changed: the Health and Social Services Group is now known as the Health, Social Care and Early Years Group. As this change took place outside the Inquiry's specified period, I shall refer to the Group as the Health and Social Services Group.

64. The structure of the Social Services and Integration Directorate is set out in the organogram which I exhibit as **M08/OLWG/14 - INQ000495978**. During the relevant period the Enabling People Division, which was led by Alistair Davey, Deputy Director, had oversight of safeguarding policy.

65. The relevant principal officials in the Health and Social Services Group were as follows:

- a. Andrew Goodall, Director General for the Health and Social Services Group, who was also the Chief Executive of the NHS in Wales. In November 2021, Andrew was succeeded by Judith Paget;
- b. Albert Heaney CBE, Director of Social Services and Integration until March 2020 before combining this role with the role of Deputy Director General Health and Social Services Group until June 2021. Since June 2021 he has been the Chief Social Care Officer for Wales with senior responsibility for social care policy. He reports to the Director General, Health and Social Services Group;
- c. Dr Heather Payne, Senior Medical Officer for Women's and Children's Health. This is a professional advisory role, providing technical medical and health advice. Heather Payne also chaired the Technical Advisory Group's Children and Schools sub-group.
- d. Name Redacted Head of Mental Health and Vulnerable Groups
- e. Alistair Davey - Deputy Director, Social Services Enabling People – Safeguarding who had oversight of children's safeguarding policy.

Education and Public Services Group officials

66. As referenced above, I was the Director General for Education and Public Services between November 2017 and April 2022. Jo-Anne Daniels was appointed as Acting Director General of Education, Social Justice and Welsh Language in April 2022. She held the same responsibilities as I had held when in the role.

Operations Directorate

- a. Carla Lyne was the Director of Operations and had responsibility for Digital Resilience in Education until April 2024 when responsibility then moved to the Education Directorate; and
- b. Chris Owen was the Deputy Director for Digital Learning and led on the delivery of the Hwb programme until June 2021.

Education Directorate

- c. Steve Davies was the Director of Education. He was responsible for statutory primary and secondary education in schools including the response to Covid-19. He retired in May 2021;
- d. Owain Lloyd was the Director of Education and Welsh Language following Steve Davies' retirement in May 2021 and until his departure from the Welsh Government in October 2024 Owain was also responsible for Welsh Language policy;
- e. Mike Jones was the Deputy Director for Digital Learning from November 2021 to April 2024, and is now the Deputy Director for Schools Digital Service Division leading on the delivery of the Hwb programme;
- f. Huw Owen was the Deputy Director for School Effectiveness and led on school operations until May 2020;
- g. Ruth Conway was the Deputy Director for Operation of Schools and led on school operations from May 2020 until March 2022;
- h. Georgina Haarhoff was the Deputy Director for Curriculum from June 2020. She led on school curriculum and public examinations in 2020 and 2021 and on the Renew and Reform education recovery programme developed from January 2021. She is now the Director of Education;
- i. Chris Jones was the Deputy Director for Support for Learners and led on free school meals, and children with additional learning needs until July 2021;
- j. Bethan Webb is the Deputy Director for Welsh Language who led on Welsh language provision and policy throughout the relevant period; and
- k. Kevin Palmer was the Deputy Director for Pedagogy Leadership and Professional Learning and led on learning continuity and expectations throughout the relevant period.

Communities and Tackling Poverty Directorate

- l. Claire Bennett was the Deputy Director for Curriculum (in the Education Directorate) until May 2020 until she took up the role of Director for Communities and Tackling Poverty for the remainder of the pandemic. Her Directorate covered early years, childcare, play, families, communities and poverty. She remained in post during the specified period;
- m. Nicola Edwards was the Deputy Director of Early Years, Childcare and Play Division. Her responsibilities included childcare, play and early years provision. She was also involved in some discussions around the early approach to schools. She remained in post during the specified period; and

- n. Karen Cornish was Deputy Director for Children and Families Division. She led on cross-government co-ordination of actions relating to vulnerable children. She was also responsible for support for parents and children's rights. She retired in October 2022.

Part B – General

Knowledge and impact of Harms to children

67. The National Survey for Wales 2014-15, published on 28 March 2017 and exhibited at **M08/OLWG/15 - INQ000610590**, showed that 95% of children aged 7-15 used the internet at home and, according to parents, 64% used the internet to access school learning platforms with 67% using the internet to find other information related to schoolwork. The percentage of children using the internet for school-related activities increased with the age of the child. At age 7-10, 23% of children used the Hwb school learning platform, and 62% used the internet for finding other information related to schoolwork. For children aged 14-15, this increased to 33% accessing the Hwb school learning platform, and 73% using the internet to find other information related to schoolwork. 56% of households with children used parental control filters, 32% did not use any filters and 12% had never heard of internet filters. 87% of parents agreed (strongly agreed or tended to agree) that their child knew how to stay safe online.
68. The School Health Research Network is funded by the Welsh Government, in collaboration with Cardiff University and Public Health Wales and every two years provides the results of the Student Health and Wellbeing Survey in Wales for children between the age of 11 and 16 (school years 7 to 11). The findings from these studies are integrated into the World Health Organisation supported Health Behaviour in School-aged Children international study, enabling a comparison with countries in Europe, Central Asia and Canada. Designed to provide an understanding of young people's health and wellbeing, the study provides insights into social media usage through the Social Media Disorder Scale. The scale comprised of nine questions about social media experiences over the past year which were: [During the past year have you...]
- a. Regularly found that you can't think of anything else but the moment that you will be able to use social media again;
 - b. Regularly felt dissatisfied because you wanted to spend more time on social media;
 - c. Often felt bad when you could not use social media;
 - d. Tried to spend less time on social media, but failed;

- e. Regularly neglected other activities (e.g. hobbies, sport) because you wanted to use social media;
- f. Regularly had arguments with others because of your social media use;
- g. Regularly lied to your parents or friends about the amount of time you spend on social media;
- h. Often used social media to escape from negative feelings; and
- i. Had serious conflict with your parents, brother(s) or sister(s) because of your social media use (response options: 'yes', 'no').

69. The 2019/20 report, exhibited at **M08/OLWG/16 - INQ000611576**, found that around 1 in 10 young people were classified as a problematic user of social media, having scored six or higher on the Social Media Disorder Scale.

70. The 2021/22 report, exhibited at **M08/OLWG/17 - INQ000611574**, found that 13% of young people were classified as a problematic user of social media, having scored six or higher on the Social Media Disorder Scale. The 2023 social media use (Social Media Disorder Scale) and online contact indicators will be published on the School Health Research Network online dashboard in summer 2025.

71. The School Health Research Network also carried out health and wellbeing research on primary school students from 2021 onwards. In 2021, a survey of year 6 (ages 10-11) students, exhibited at **M08/OLWG/18-INQ000611572** provided the following information:

- a. Most children (81%) reported owning a smartphone;
- b. Two thirds of children (67%) reported owning their own computer or laptop;
- c. Almost two thirds of children (65%) reported owning a tablet; and
- d. Children most commonly reported using devices for entertainment and social connectedness – 89% reported watching videos, 78% reported speaking to friends online, 77% reported playing games, 74% reported watching TV or films, 68% reported using social media sites, 53% reported speaking to family online, 46% reported reading books and 40% reported schoolwork

72. The 2022/23 survey expanded to include all students in years 3 to 6 and 32,606 students took part between September 2022 – March 2023. The report is exhibited at **M08/OLWG/19 - INQ000611570** and provided the following information:

Year 3 (ages 7-8)

- a. 43% reported owning a smartphone;

- b. 39% reported owning their own computer or laptop;
- c. 73% reported owning their own tablet;
- d. 67% reported playing computer games, 69% reported watching TV/films, 62% reported using the device to read, 42% reported using the device to speak to friends and 42% reported using the device to speak to family members; and
- e. 31% reported using social media a few times a week or everyday

Year 4 (ages 8-9)

- f. 53% reported owning a smartphone;
- g. 48% reported owning their own computer or laptop;
- h. 72% reported owning their own tablet;
- i. 71% reported playing computer games, 70% reported watching TV/films, 65% reported using the device to read, 56% reported using the device to speak to friends and 47% reported using the device to speak to family members; and
- j. 39% reported using social media a few times a week or everyday

Year 5 (ages 9-10)

- k. 68% reported owning a smartphone;
- l. 56% reported owning their own computer or laptop;
- m. 72% reported owning their own tablet;
- n. 75% reported playing computer games, 72% reported watching TV/films, 63% reported using the device to read, 66% reported using the device to speak to friends and 51% reported using the device to speak to family members; and
- o. 51% reported using social media a few times a week or everyday

Year 6 (ages 10-11)

- p. 83% reported owning a smartphone;
- q. 63% reported owning their own computer or laptop;
- r. 68% reported owning their own tablet;
- s. 75% reported playing computer games, 73% reported watching TV/films, 58% reported using the device to read, 79% reported using the device to speak to friends and 61% reported using the device to speak to family members; and
- t. 65% reported using social media a few times a week or everyday

73. The Office for National Statistics published data from the Crime Survey for England and Wales in November 2020 on online bullying. The data collected related to a period prior to

the pandemic and was not published separately for Wales. The survey, exhibited at **M08/OLWG/20 - INQ000611568** found that:

- a. Around one in five children aged 10 to 15 years in England and Wales (19%) experienced at least one type of online bullying behaviour in the year ending March 2020, equivalent to 764,000 children; and
- b. Being called names, sworn at or insulted and having nasty messages about them sent to them were the two most common online bullying behaviour types, experienced by 10% of all children aged 10 to 15 years.

74. Data was not collected from children during the pandemic and further data on this topic was not available until March 2024.

75. The Education Directorate does not hold any data on the impact on children of accessing and using online technology in relation to their physical health, mental health and wellbeing, educational development and social development.

76. However, the Keeping Safe Online area on the Hwb website was updated throughout the pandemic and aims to raise awareness and support schools to improve and embed digital resilience throughout their school. Activities in this important area have evolved in schools ensuring children and young people in Wales are educated in using digital tools and using the internet safely and appropriately.

77. In August 2022, Administrative Data Research Wales published an analysis of Hwb login data for the 2019-2020 academic year, exhibited at **M08/OLWG/21 - INQ000611571**. This data did not provide a complete measure of Hwb usage, nor online learning in general during the pandemic but provided an indication of patterns and trends in digital learning during the pandemic. The analysis found that:

- a. There was a clear uptrend in Hwb logins from March 2020 with a peak during April 2020, and then a downtrend until July 2020;
- b. There was higher engagement with Hwb (measured via logins through the Hwb website) for schools with a lower proportion of students eligible for free school meal; and
- c. The disparity between schools with higher and lower proportions of students eligible for free school meal was found across both primary and secondary schools. A disparity was not found in the data from the special schools. This may be due to the small number of Hwb login data available for these schools.

78. I exhibit at **M08/OLWG/22 - INQ000615874** a monthly breakdown of the use of Hwb services from January 2019 to March 2025. Column J shows the total combined logins across the core service for each calendar month. In January 2021 and April 2023 Hwb was updated to reflect changes in industry standards related to authentication and session management. Before January 2021 the data shows all logins to Hwb via the Hwb website only and from January 2021 the data reflects the number of Hwb user logins to Hwb services. The number of Microsoft logins decreased in 2023 due to an amendment to Microsoft's session authentication data.

Research / Work carried out by the Welsh Government to identify any trends and/or patterns in relation to children's exposure to online harms.

79. The Welsh Government did not conduct any specific research or work to gather views on online harms or the extent to which children were exposed to harmful content during the pandemic. However, the Welsh Government did work with various organisations and groups throughout the pandemic who provided information on online harms trends and concerns. The Education Digital Resilience team worked closely with Ofcom, the UK Safer Internet Centre, the Internet Watch Foundation, the National Society for the Prevention of Cruelty to Children, Childnet and Internet Matters, in relation to the identification and monitoring of online harms.

80. The Education Directorate are members of the Wales Internet Safety Partnership group, which is an informal partnership between organisations in Wales to share information and promote digital literacy for children and young people. The group provides an impartial forum, with each member organisation rotating as the chair, with officials from the Welsh Government providing the secretariat for this group since January 2020. The group helped to inform the guidance and resources which were published for schools on the Keeping Safe Online area of the Hwb website.

81. The Welsh Government were also made aware of information relating to online harm from the Safeguarding Board Chairs, the National Independent Safeguarding Board and the Vulnerable Children, Young People and Safeguarding external advisory group. Meetings were held throughout the pandemic thus enabling the sharing of relevant information. I have detailed below the multi-agency meetings where these matters were raised.

82. At the 28 January 2020 Wales Internet Safety Partnership meeting, Education Directorate officials reported that the Online Safety Zone of the Keeping Safe Online area of the Hwb website had been updated to cover screen time, pornography, online bullying, consent,

illegal and offensive content and grooming. Further detail is provided throughout the statement. The Welsh Government were made aware of an Ofcom report that referenced 79% of 12–15-year-old internet users across the UK had reported at least one harmful experience online. I exhibit the meeting minutes at **M08/OLWG/23 - INQ000611589**.

83. At the 21 April 2020 National Independent Safeguarding Board meeting, the safeguarding board business managers updated the Welsh Government that North Wales police had concerns about the increased risk of online abuse, child exploitations and child sexual abuse. I exhibit the meeting minutes at **M08/OLWG/24 - INQ000611539**.

84. In advance of the 29 April 2020 Wales Internet Safety Partnership meeting, National Society for the Prevention of Cruelty to Children Cymru raised concerns that “children’s increased online activity coupled with added isolation/loneliness means the lockdown is providing a three-fold perfect storm for people who seek to abuse children online”. I exhibit the meeting minutes at **M08/OLWG/25 - INQ000611590**.

85. At the 15 July 2020 Wales Internet Safety Partnership meeting, Stop It Now! stated that there had been increased reports of issues through their child sexual abuse helpline, an example being an increased exposure to children and young people pornography. I exhibit the meeting minutes at **M08/OLWG/26 - INQ000611553**.

86. In advance of the 21 October 2020 Wales Internet Safety Partnership meeting, Ofcom provided an update on their children’s media lives survey which provided analysis of findings from a Covid-19 specific study into media lives of children. This study included two children from Wales and is exhibited at **M08/OLWG/27 - INQ000611594**.

87. At the 12 February 2021 meeting of the Vulnerable Children, Young People and Safeguarding external advisory group, the Children’s Commissioner survey highlighted 166 children and young people reported they did not feel safe online, the group noted this was a serious concern about hidden child sexual exploitation and that 95% of referrals have resulted in formal action for child protection. I exhibit the meeting minutes at **M08/OLWG/28 - INQ000610550**.

88. At the 26 May 2021 Wales Internet Safety Partnership meeting, the All-Wales School Core Liaison Programme updated that reports were currently rising from survivors of sexual assault, however there had not been the expected surge of reports in Wales from young people. There were eight anonymous reports from University students in Wales. I exhibit the meeting minutes at **M08/OLWG/29 - INQ000611593**.

89. The Welsh Government did not record rates of illegal content throughout the pandemic, however through insights from organisations and the meetings detailed throughout this statement, the Welsh Government became aware of an increase in child sexual exploitation and abuse, online hate offences and online bullying. In response to this, advice, guidance and resources to support the protection of children and young people online were published on the Hwb website as detailed throughout the statement but specifically at paragraphs 135 and 136.

90. The Welsh Government are members of the UK Safer Internet Centre's Early Warning Group which met every six weeks from September 2019 and discussed emerging themes and trends in relation to online safety. The Welsh Government did not provide secretariat services for this Group and accordingly do not hold any meetings. The UK Safer Internet Centre raised concerns in April 2024 that the rates of images of children being scraped from the internet and posted on inappropriate adult sites had increased. In consultation with the UK Safer Internet Centre, the Welsh Government issued guidance on 23 April 2024 on web scraping. The guidance provided schools and local authorities with information on how to reduce the risk of public images being shared inappropriately. I exhibit the guidance at **M08/OLWG/30 - INQ000611591**. Through the UK Safer Internet Centre's Early Warning Group, the Welsh Government also became aware that there was a rise in instances of sextortion. On 29 April 2024, following a National Crime Agency alert, the Hwb website was updated with advice to schools on financially motivated sexual extortion. I exhibit the Hwb update at **M08/OLWG/31 - INQ000611595**.

91. Between 2014 and 2019, the Welsh Government also:

- a. Delivered online safety training to more than 5,000 education practitioners and professionals;
- b. Supported the improvement of schools' online safety provision through the 360 degree safe Cymru tool – the tool is provided through the Hwb digital learning platform to help schools review and improve their online safety policy and practice. Further information on the 360 degree safe Cymru tool is detailed throughout this statement;
- c. Provided online safety information for education practitioners and professionals, students, governors, parents and carers through the Online Safety Zone on the Hwb digital learning platform in the form of news, resources, information and guidance, and playlists;
- d. Provided funding and support through the Learning in Digital Wales Continuing Professional Development Grant to enable the regional consortia to actively

promote digital citizenship and the safe and responsible use of digital technology;
and

- e. Supported an annual Safer Internet Day with campaigns and competitions for children and young people and schools to raise awareness of online safety issues

92. The Education Directorate maintain a variety of guidance, resources and advice on Hwb which is aimed at different audiences. Throughout the pandemic the Hwb website was updated with relevant information and further information is detailed below. These include:

- a. Advice for children and young people on online issues, the resources available are exhibited at **M08/OLWG/32 - INQ000611559**;
- b. Resources for practitioners, governors and school staff. I exhibit at **M08/OLWG/33 - INQ000611603** the range of online resources available on the Hwb website; and
- c. Parents, families and carers, I exhibit an example of app guides for families at **M08/OLWG/34 - INQ000611560**.

93. The Inquiry specifically asks about the rates, types and impact of harm during the specified period as defined by the Online Safety Act 2023. As noted above, the regulation of internet services is the responsibility of the UK Government. The Welsh Government did not receive data from the UK Government or Ofcom about rates, types and impact of harm in respect of Wales or the measures to mitigate that harm. The Welsh Government did however work closely across devolved policy areas to ensure the objectives of the Act were supported, for example through education resources, as detailed throughout this statement.

Hwb

94. Hwb is the Welsh Government's strategic channel for supporting schools to embrace the opportunities and benefits of digital in the Curriculum for Wales. The Hwb digital learning platform was launched in 2012 in response to the *'Review of digital learning: find it, make it, use it, share it' report*, exhibit **M08/OLWG/35 - INQ000610573** refers. This had been commissioned by an external task and finish group, established by the then Minister for Education and Skills, whose membership included representatives of schools, colleges, the media and the IT industry. The Hwb platform had continuously evolved pre-pandemic to support the teaching of the curriculum in Wales.

95. The Welsh Government has engaged with industry experts in online safety since the inception of Hwb. Through these relationships, the Welsh Government has established trusted partners, including organisations such as Ofcom and the National Society for the

Prevention of Cruelty to Children, which have assisted in the identification of emerging themes in online safety and the production of resources, advice, and guidance to support schools in Wales to strengthen their approach to online safety. The Welsh Government works very closely with South West Grid for Learning, Childnet and the Internet Watch Foundation, which is a partnership of three charities with a mission to make the UK the safest place to be online as part of the UK Safer Internet Centre.

96. The Curriculum for Wales guidance is also published on the Hwb website, which means it is accessible by all schools, settings, parents and students. Published in early 2020, the Curriculum for Wales includes mandatory cross-curricular skills, one of which is digital competence.

Development of online safety tools and guidance

97. In January 2014, the Welsh Government commissioned the South West Grid for Learning – a not-for-profit charity and part of the UK Safer Internet Centre – to carry out work on its behalf. The organisation is made up of online safety experts who provide advice to schools, public bodies, and industry, on safeguarding measures and the development of effective online safety policies. The Welsh Government asked the South West Grid for Learning to support its efforts to promote safe and responsible internet use, particularly in educational settings. The aim was to promote safe, responsible and considerate behaviour online, and to help protect children and young people in Wales from illegal and harmful content on the internet by developing a range of online safety tools, resources and activities aimed at education practitioners and professionals, governors, student, parents and carers. These activities included e-Safety training for education professionals and school governors, and developing resources to support children, parents and teachers.

98. In October 2014, the “360 safe Cymru” tool was launched, exhibit **M08/OLWG/36 - INQ000610586** refers. The tool was developed with the South West Grid for Learning. The purpose of the 360 safe Cymru tool was to support schools with online safety as part of the Hwb platform. The tool is a bilingual online safety self-review tool for schools to use to assess and improve their online safety provision and to support the creation. and update. of relevant policies for online safety. It allows schools to review their online safety policy and practice, benchmark this against national standards and suggests action plans. The tool is provided free to schools in Wales through the Hwb platform. The 360 safe Cymru online safety self-assessment tool is regularly reviewed and updated to reflect changes in advice and guidance. The most recent update of the tool was launched in April 2024 and

focussed on the Technology Element in the tool and associated content in the policy templates, exhibit **M08/OLWG/37 - INQ000610585** refers.

99. The 360 safe Cymru tool is split into a number of aspects which cover the main areas of online safety in a school, e.g. responsibilities, policy, communications and technical security. Each aspect offers five level statements, ranging from 'nothing in place' to the aspirational practice. Included for each aspect are target levels reflecting good online safety practice, and included for every single level are suggested improvement actions that describe how schools might reach the next level. Analysis of 360 safe Cymru, shows that schools in Wales report that the strongest aspects of their online safety provision are:

- a. Filtering and monitoring
- b. Policy scope
- c. Policy development
- d. Acceptable use
- e. Digital and video images

100. In January 2015, the Welsh Government published 'Keeping Learners Safe', exhibited at **M08/OLWG/38 - INQ000610584**. This document assisted education providers to make sure they had effective systems in place to support the safety and wellbeing of children and young people. The guidance contained a section regarding e-safety, referencing a new e-safety zone has which had been created on the Hwb website to provide resources, news and research on staying safe in the digital space by adopting appropriate behaviours and a positive digital presence.

101. In September 2016, the Welsh Government published the '*Digital Competence Framework*' guidance as part of the cross-curricular skills frameworks and I exhibit the guidance at **M08/OLWG/39 - INQ000611562**. This aimed to support the teaching of the knowledge, attitude and skills that children needed to be able to use technology and systems confidently, creatively and critically, including online safety and sat alongside the usual curriculum subjects. It was launched by the then Cabinet Secretary for Education and I exhibit the Written Statement at **M08/OLWG/40 - INQ000610572**. The framework was designed to sit alongside ICT and computer science and encourage the integration of digital skills across the full range of lessons and included specific elements focused on online safety. The citizenship element of the Digital Competence Framework included learning related to online safety, online behaviour, bullying and health and well-being. The Health and Well-Being Area of Learning and Experience of the Hwb is concerned with developing the capacity of children to navigate life's opportunities and challenges. It

includes how using the online world safely and responsibly, exploring relationships in an online context, and understanding social norms and influences in respect of technology, can all support stronger decision-making in relation to online safety and online bullying and promote positive online behaviours.

102. On 7 February 2017, the Minister for Education launched the new Online Safety Zone for Welsh teachers and students on the Hwb website, **M08/OLWG/41 - INQ000610583** refers. The platform was developed for and with the sector, and included range of resources on various safety issues to help keep students safe online. The platform also aimed to direct those dealing with the effects of online bullying or any online safety issues towards appropriate support services. The operation of the Hwb's Online Safety Zone was overseen by officials in the School's Digital Learning Division who worked in collaboration with the South West Grid for Learning to ensure the Online Safety Zone met, and continues to meet, the current needs of young people, parents and practitioners, keeping up with online trends. The content for the Online Safety Zone is created by the South West Grid for Learning with officials from the Welsh Government ensuring that such content was aligned with the Welsh curriculum as well as identified need arising from input from a number of partner agencies including the National Society for the Prevention of Cruelty to Children.

103. In autumn 2017, the Welsh Government worked with the National Society for the Prevention of Cruelty to Children to develop an engagement activity pack entitled '*Make your space safe, make your voice heard*', exhibited at **M08/OLWG/42 - INQ000610582**. This activity was publicised as part of a joint event with the then National Assembly for Wales' Cross-Party Group on Children and Young People and the Cross-Party Group on Preventing Child Sexual Abuse. The activity pack was made available through the online safety zone on Hwb and invited children of all ages to share their views to guide the development of what would be the Welsh Government's first online safety action plan. The concerns identified from the engagement activity were a core consideration in the development of the actions taken forward to protect children and young people using the internet.

104. In February 2018, the Welsh Government published guidance titled '*Recommended web filtering standards for schools in Wales*', this guidance provided advice to schools and local authorities on the recommended approaches to web filtering within educational settings and is exhibited at **M08/OLWG/43 - INQ000611592**. The guidance was updated in October 2021 on the Hwb website as part of the 'Keeping Students safe' statutory guidance resources, exhibited at **M08/OLWG/44 - INQ000611564**. The standards

supported schools to establish a safe, responsible and supportive online environment, and prevent access to inappropriate content. During 2021 the Welsh Government worked with local authorities across Wales to review and update these standards. The update was published on Hwb in November 2021, see exhibit **M08/OLWG/45 - INQ000611558**. In February 2025, the standards were again reviewed by local authorities to ensure that they remained relevant and aligned with industry advice and guidance. The standards were then updated to reflect web filtering and online safeguarding, and included best practice guidance to ensure web filtering and online safeguarding is applied on iOS devices.

105. On 15 July 2019, the Welsh Government published the '*National Action Plan Preventing and Responding to Child Sexual Abuse*', exhibited at **M08/OLWG/46 - INQ000610588**. The plan set out the 33 actions the Welsh Government would take to prevent Child Sexual Abuse, to protect children from Child Sexual Abuse and to support children who had been sexually abused. A report setting out what had been delivered under this plan was published on 29 November 2022 and exhibited at **M08/OLWG/47 - INQ000610587**.

106. In December 2019, the Welsh Government expanded the online safety provision to include digital resilience in education, recognising the need to develop knowledge, skills and strategies in order for children and young people to stay safe online, identify risks and misinformation, to seek help when needed while also enabling them to benefit from the opportunities available through the internet. Digital resilience encapsulates the need to develop knowledge, skills and strategies to support children and young people to:

- a. Manage their online experience safely and responsibly;
- b. Identify and mitigate risks to stay safe from harm online;
- c. Understand the importance of using reliable sources and employing critical thinking skills to identify misinformation;
- d. Seek help when they need it;
- e. Learn from their experiences and recover when things go wrong; and
- f. Thrive and benefit from the opportunities the internet offers.

107. In February 2020, a number of resources were launched on the Hwb website. These were signposted by the platform's Keeping Safe Online half term digest, see exhibit **M08/OLWG/48 - INQ000610576**, and included:

- a. Online safety resources for student with additional learning needs including activity ideas about how to stay safe online, trusting people online and respecting others online, see exhibit **M08/OLWG/49 - INQ000610575**;
- b. “Be Internet Legends”, a Key Stage 2 resource designed to teach children and young people the skills they need to be safe and confident online exhibited as **M08/OLWG/50 - INQ000611604**;
- c. Illegal and offensive content playlists available for primary student, secondary students, education practitioners, parents and carers and governors exhibited as **M08/OLWG/51 - INQ000610570**;
- d. New films and guides for families to start conversations about sexting and grooming, in addition to existing guidance in relation to screen time, pornography and online bullying;
- e. Links to safer internet day;
- f. Links to 360 degree safe Cymru; and
- g. Links to a number of online safety related competitions and events.

108. By April 2020 it was clear that the that pandemic was leading to an increase in time spent online across all age groups thus giving rise to the need to consider the increased risks that this posed. In response on 20 April, 2020, the Welsh Government published new online safety guidance as part of the ‘Stay safe, Stay learning’ programme on which I exhibit here as **M08/OLWG/52 – INQ000593520**. Launched by the Minister for Education, this guidance explored online safety considerations and concerns and provided children and young people, practitioners and professionals, families and governors with guidance, advice, home-learning resources and practical tips to address online issues. The announcement by the Minister for Education is exhibited as **M08/OLWG/53 - INQ000610577**.

109. In April 2020, Hwb’s ‘*Keeping Safe Online half term round-up*’ acknowledged that the pandemic had led to an increase in the use of technology, highlighting the importance of keeping children and young people safe online, see exhibit **M08/OLWG/54 - INQ000610574**. The update signposted guidance that had been created in the Online Safety Zone that explored some online safety considerations for parents and carers, directing them to education and online safety resources, including a new roadmap providing an overview of online safety resources. The update indicated that similar guidance for practitioners and governors would be available soon. Resources promoted in that update included content regarding the following topics:

- a. Online hate speech;

- b. Film age ratings;
- c. Radicalisation and extremism;
- d. Cyber security in schools; and
- e. Safe use of Microsoft Teams.

110. On 28 May 2020, the Online Safety Zone was renamed 'Keeping safe online' with a commitment to providing resources, guidance and information regarding cyber security, as well as online safety, for children and young people, education practitioners, professionals and governors. The platform continued to provide a host of bilingual resources, including links to resources created by, or developed in collaboration with, organisations including the South West Grid for Learning, the National Society for the Prevention of Cruelty to Children, Common Sense Media and the National Crime Agency.

111. Also in the same month, a roundup of online safety news, resources, events and competitions for students, their parents/carers, education practitioners and governors was provided on the Hwb website, see exhibit **M08/OLWG/55 - INQ000610581**. The update provided a summary of the latest information and new resource including:

For students:

- a. Fraud, finance and online crime resources with separate resources for primary and secondary students;
- b. Keeping safe online guidance for primary students, as part of the Stay Safe. Stay Learning programme;
- c. Keeping safe online guidance for secondary students, as part of the Stay Safe, Stay Learning programme;
- d. SchoolBeat activities, specifically aimed at targeted age groups, based on familiar lessons delivered by school community police officers in schools and are carefully designed to reinforce SchoolBeat's key online safety messages;
- e. Posters for young people about safe and healthy relationships, including where to go for support; and
- f. Links to age specific 15-minute online safety at home activities produced by the National Crime Agency.

For parents:

- a. Keeping safe online guidance for parents and carers as part of the Stay Safe, Stay Learning programme;

- b. A series of four short videos offering advice and guidance about some of the latest apps and online issues regarding Misinformation, Roblox, Houseparty and TikTok;
- c. Posters exploring 'what parents and carers need to know' about Facebook, Twitter, Snapchat, Instagram, Roblox and Misinformation;
- d. Fraud, finance and online crime resource exploring types of online crime and how people try to steal personal information and money online;
- e. Keeping safe online guidance for parents and carers as part of the Stay Safe, Stay Learning programme; and
- f. An information poster to support parents and carers who were worried about their teenager's behaviour.

For practitioners:

- a. Fraud, finance and online crime resource;
- b. Keeping safe online guidance for education practitioners; and
- c. Live-streaming safeguarding principles and practice for education practitioners guidance which had been published as part of the 'Stay Safe, Stay learning' programme to support schools who wished to live-stream lessons with their students.

112. The roundup also provided links to specific guidance for governors and governing bodies regarding keeping safe, fraud and online crime.

113. Another key update in the May 2020 roundup provided information about the 'Report Harmful Content' service, see exhibit **M08/OLWG/56 - INQ000611577**. This service, operated by the South West Grid for Learning, provides advice to anyone who has come across harmful content online as well as support to anyone over the age of 13, who had already reported harmful content and would like the outcome reviewed. The Report Harmful Content service aims to provide support, within 72 hours, specifically in relation to the following types of harm: online abuse, bullying, harassment, threats, impersonation, unwanted sexual advances (not image based), violent content, self-harm or suicide content and pornographic content. The May 2020 roundup provided links to this service. As well as the update the Welsh Government had also funded a Welsh language translation of the Report Harmful Content website.

114. In May 2020, the Welsh Government also published guidance regarding live-streaming and video conferencing which I exhibit here as **M08/OLWG/57 - INQ000611552**. This guidance outlined key considerations for safe practice when live-streaming or video

conferencing to support remote learning. In September 2020 the guidance was updated and re-published to reflect instances where practitioners and students were back in the classroom while retaining the guidance on working and learning from a home environment, see exhibit **M08/OLWG/58 – INQ000541502**. It was also extended to include guidance for other practitioners and external organisations that support maintained schools and settings and their students. In January 2021, the guidance was further updated and re-published to take account of feedback from schools and local authorities. The section which had previously outlined the numbers of practitioners required for live-streaming was removed to allow for local flexibility and decision-making, see exhibit **M08/OLWG/59 - INQ000541498**. In developing their approach to live-streaming and video-conferencing, schools were required to undertake a risk assessment and review their safeguarding processes and procedures (including reporting mechanisms) to ensure the safety and security of their students and staff.

115. Also in May 2020, a series of resources were released on the Hwb website including a series of worksheets with activities aimed to highlight some of the risks associated with spending time online and promote positive online behaviour. The worksheets also provided practical information for children and young people on what they can do to prevent or report particular issues, exhibit **M08/OLWG/59 - INQ000541498** refers.

116. In July 2020, a further round up of online safety news was provided on the Hwb website. The update included links to the following resources which were available in addition to that which had been identified in the May 2020 update as outlined above:

- a. Loneliness, social isolation and social media resources, with separate resources for primary and secondary students for both parents and students;
- b. Guidance and activities for parents to develop an understanding of online safety issues and support children when at home;
- c. A poster exploring what parents and carers need to know about TikTok;
- d. Digital safety for parents guidance from the Home Office containing useful information about safeguarding children and young people from harmful influences online, including how to spot exploitation;
- e. A practitioner's guide to understanding risks of the dark web;
- f. A practitioner's guide to bias and misinformation;
- g. Loneliness, social isolation and social media resource for practitioners; and
- h. Digital safety resources for practitioners regarding safeguarding from harmful influences online.

117. On 6 July 2020, non-statutory guidance for practitioners was issued and is exhibited at **M08/OLWG/60 - INQ000081273**. There was an informal consultation with members of the Vulnerable Children, Young People and Safeguarding Group to inform this guidance. The guide supported safeguarding practices in identifying risk of harm, reporting concerns and handling disclosures by children and young people. It was developed in response to concerns that children may have come to hidden harm during lockdown. The guide aimed to support safeguarding practice as lockdown was eased and face-to-face contact with children and young people is reactivated. The guidance included a link to the practice guide on '*Safeguarding children from online abuse*', exhibited at **M08/OLWG/61 – INQ000611549** which contained information on online grooming, online sexual abuse, online harmful sexual behaviour and online radicalisation.

118. In October 2020, Hwb's Keeping Safe Online half term round-up, exhibited at **M08/OLWG/62 - INQ000611578**, contained links to new content that had been uploaded to the Hwb website during that half term, including resources in relation to:

- a. Making good decisions online;
- b. Fake news and media literacy;
- c. Personal safety (including sexting);
- d. App and social media awareness for parents;
- e. The differences between misinformation, fake news and deepfakes, including advice for children and families on how to recognise and stop the spread of false and possibly harmful information on the internet;
- f. Live streaming;
- g. In game chat;
- h. Sharing images;
- i. Live streaming; and
- j. Phishing awareness.

119. In December 2020, the Welsh Government published the guidance '*Sharing nudes and semi-nudes: Responding to incidents and safeguarding children and young people (2020)*', to support educational settings to respond effectively to incidents of nude and semi-nude images being shared, see exhibit **M08/OLWG/63 - INQ000610578**. The guidance was developed with the UK Council for Internet Safety. An accompanying online training module was developed and published in October 2021 to support schools to embed this guidance. This online training module was aimed at the designated safeguarding person or senior managers within an education setting.

120. From 2021, the Welsh Government also worked with industry experts to create articles relating to online safety and digital resilience offering further insight on emerging trends. These are available on the Hwb website and exhibited at **M08/OLWG/64 - INQ000611557**.
121. The January 2021 the “Keeping Safe Online” half term round-up included links to new and updated resources that had been made available in respect of the following (see exhibit **M08/OLWG/65 - INQ000611580**):
- a. Impersonation resources for primary and secondary students focusing on protection from online deceit;
 - b. Family guides regarding gaming, sharing photos and videos;
 - c. An information poster regarding the Houseparty app (alongside previously released posters relating to other social media apps);
 - d. Information for practitioners regarding body image and social media; and
 - e. Links to guidance for practitioners and governors regarding responding to incidents of nudes and semi-nude image sharing, as referred to above.
122. In 2021, the Welsh Government joined the child protection charity, The Internet Watch Foundation, an organisation whose aim is to eliminate child sexual abuse material from the internet. The Welsh Government became the first government member world-wide and sought to work with the organisation to ensure that the Hwb platform was as safe as possible. The Internet Watch Foundations launched campaigns called, (which included bilingual materials), “Gurls Out Loud” and “Home Truths” in response to rising numbers of reports of child sexual abuse material online, where children had been groomed, deceived or extorted into producing and sharing a sexual image or video of themselves. This support was provided through the Hwb programme with separate films provided for parents and children.
123. Through the Keeping safe online area on the Hwb website, the Welsh Government has developed resources to support practitioners to address online sexual harassment with students in an age-appropriate way. Resources include ‘Step up, speak up’ (published in May 2021 and exhibited at **M08/OLWG/66 - INQ000611563**, ‘Just a joke?’ (published September 2021 and exhibited as **M08/OLWG/67 - INQ000611585** and teaching toolkits designed to support a whole school approach in understanding, preventing and responding to online sexual harassment.
124. The Welsh Government continued to publish half termly updates on the latest digital resilience news, resources, events and staying alert to harmful trends as well as working

with safeguarding colleagues to promote guidance to schools and to support the management of incidents (such as viral bullying). Regular updates continued in this vein throughout the specified period and beyond including Hwb's June 2021 Keeping Safe Online half term round-up, exhibited at **M08/OLWG/68 - INQ000611565**, which included a practitioner's guide to using social media. This included a discussion of appropriate guidance on privacy settings, creating boundaries and digital footprints. The update also included:

- a. A series of playlists exploring the difference between healthy and unhealthy relationships, the importance of consent and online relationships;
- b. Resource aimed at 11–18-year-olds, to inform them of what is real and what is not on social media and how to recognise the difference between 'real life' and 'social media life';
- c. Resource aimed at 11–14-year-olds to help them to discuss issues related to the sharing of nude images and to help them understand healthy and unhealthy relationship behaviours; and
- d. A toolkit for practitioners designed to address the issue of online sexual harassment amongst 13-17 years olds.

125. The Keeping Safe Online half term round-up in September 2021, which I exhibit here as **M08/OLWG/69 - INQ000611583**, also provided links to a number of resources including:

- a. Guidance for practitioners and governors regarding responses to sharing of nude photographs;
- b. Resource for four- to seven-year-olds about trust, false identity online, consent and asking an adult they trust for help if online content made them feel uncomfortable;
- c. Animations and activities to support 8-10-year-olds spot the early signs of manipulative, pressurising and threatening online behaviour and to develop their confidence and skills to respond safely and seek help;
- d. Resource aimed at young people aged 15-18 to identify key features of online blackmail, understand its impact, and how to access support.;
- e. Advice and reviews for parents from the the National Society for the Prevention of Cruelty to Children and O2 regarding a number of apps, including Among Us and Signal; and
- f. Leaflets for parents and carers dealing with the benefits and risks of online gaming together with advice about social media.

126. In January 2022, Hwb's Keeping Safe Online half-term round-up, exhibited at **M08/OLWG/70 - INQ000611581**, signposted links to resource for practitioners and parents regarding viral online challenges and hoaxes, online racism, infinite scroll, tackling online misogyny and online sexual harassment. An update was also provided for parents regarding the latest information on apps, social media, gaming (including games for families), and in-game purchases. This round up also included links to the latest articles and advice on digital resilience from a range of industry experts.
127. The Keeping Safe Online half term round-up in February 2022, exhibited here at **M08/OLWG/71 - INQ000611569**, provided links to advice for practitioners, parents and governors regarding children's rights and respect and relationships online, alongside links to the latest information on digital resilience from a range of industry experts.
128. The Keeping Safe Online half term round-up in June 2022, exhibited here at **M08/OLWG/72 - INQ000611567**, provided an update on the online safety content that was available. Updated content at that time included a new 'Online issues and worries' area for children and young people which provided information and advice on 10 different online safety topics, including online bullying, sharing nudes and online gaming. The advice pages offered children and young people important information and guidance on what to do and where to turn for help if they are worried about something that had happened online.
129. The Hwb Keeping Safe Online half term round-up in October 2022, exhibited here at **M08/OLWG/73 - INQ000611579**, provided additional resources including:
- a. A one-day keeping safe online conference for education practitioners and professionals;
 - b. New and updated app guides for families providing parents and carers with key information about the most popular social media and gaming apps that children and young people were using in Wales;
 - c. Guidance on challenging victim blaming language and behaviour;
 - d. Links to the 'Calling Out' video series – a collaboration with the Football Association of Wales which produced a video series featuring several Welsh international players speaking up about unacceptable online behaviours; and
 - e. An update on plans to set up a 'Keeping Safe Online Youth Group'. The update confirmed that the group would comprise a diverse group of secondary school students aged 13-16 from across Wales capturing learners' views in order to provide an authentic perspective on issues that young people experience online.

The Keeping Safe Online Youth Group was established in June 2023 and met four times during the school year, the group continued to meet throughout the 2024 school year.

130. The Hwb website has continued to release Keeping Safe Online half term roundups alongside other regular content updates and resources, ensuring that resources are kept under review, developed and updated to address the most up to date issues. The Hwb website continues to provide bilingual online safety guidance and resources for parents, carers, young persons, school governors and practitioners in order to promote further understanding of online safety issues and to help them to keep students safe online.

131. In July 2023, the existing suite of online issues and worries guides was updated and expanded to 19 guides covering a wide range of online safety related topics. These guides have been co-created with young people through a series of engagement sessions. The Welsh Government will continue to maintain these guides to ensure they contain current advice and guidance. In January 2024 the area was expanded to 20 guides, when an additional guide and video on generative AI added to the collection.

Online safety action plan

132. In 2017, the then Cabinet Secretary for Education commissioned an online safety action plan to provide a strategic focus and to coordinate work across the Welsh Government to enhance online safety for children and young people. The first plan, *'Enhancing digital resilience in education: An action plan to protect children and young people online'*, was developed and published in 2018 exhibited as **M08/OLWG/74 - INQ000611598** and set out how the Welsh Government was working with teachers, parents and carers, students and organisations across Wales, to keep children and young people safe online. The plan outlined 46 key actions for the Welsh Government to undertake in collaboration with all those working with children and young people in an education setting with the central aim to support and protect children and young people online. The action plan is updated on an annual basis and therefore offers a summary of activity against each action since its original creation in 2018.

133. On 23 October 2019, the Welsh Government published the first annual update to the online safety action plan *'Online safety action plan for children and young people in Wales 2019'*. I exhibit the plan at **M08/OLWG/75 - INQ000611596** and the Minister for Education's Written Statement announcing this at **M08/OLWG/76 - INQ000610546**. The action plan set out how the Welsh Government would help local authorities and schools to

enhance online safety provision, policy and practice across Wales. The plan also provided updated progress made against each action, summarised the activities undertaken to date, and outlined future plans and commitments, including the addition of 15 new actions which I exhibit previously at **M08/OLWG/75 – INQ000611596**. The scope of the action plan was further expanded on 20 November 2020 to include cyber resilience and data protection and set out a further 71 actions to be taken forward by the Welsh Government to enhance digital resilience provision and policy and practice across Wales. Those commitments were grouped into key themes including:

- a. Advice and support;
- b. Collaboration;
- c. Communication and promotion;
- d. Guidance and policy;
- e. Research;
- f. Resources; and
- g. Training and development.

134. I exhibit the Minister for Education's Written Statement at **M08/OLWG/77 - INQ000610560** and the expanded action plan update at **M08/OLWG/78 - INQ000611584**. The plan itself also became an online area within the Keeping Safe Online area on the Hwb website, providing updates on the achievements and progress made in respect of the plan against actions alongside details of any additional actions that were being taken forward. In accordance with the action plan, the statutory safeguarding guidance, 'Keeping learners safe', has been regularly revised and updated to include relevant updates on online safety. The guidance had been refreshed to take into account developments in legislation and policy, including online safety, online bullying and sexting. Key updates are summarised as follows:

- a. Officials from the Welsh Government worked closely with all those working with children and young people in an education setting during 2018–19 to revise and update the statutory guidance '*Keeping learners safe*';
- b. The draft guidance was published for full public consultation during summer 2019. A summary of consultation responses was published in January 2020 which I exhibit here at **M08/OLWG/79 - INQ000611546**;
- c. A final version of the guidance was published in autumn 2020, which I exhibit here at **M08/OLWG/80 - INQ000611600**;
- d. The Welsh Government worked with all those working with children and young people in an education setting to support the implementation of the updated

guidance including the publication of refreshed training modules for educational professionals, this in line with updates to the *'Keeping learners safe'* guidance;

- e. In November 2021, the guidance was updated to include reference to updated training available to support schools with responding to incidents of sharing nude or semi-nude images and recently published advice on handling online harmful viral challenges and hoaxes, see exhibit **M08/OLWG/81 - INQ000611588**; and
- f. During 2022 officials continued to work with all those working with children and young people in an education setting to support implementation of the *'Keeping learners safe'* guidance.

135. A further commitment arising from the online safety action plan was that the Welsh Government would ensure that issues of online grooming and child sexual exploitation were considered when updating the statutory guidance *'Safeguarding Children and Young People from Sexual Exploitation'*, which I exhibit here at **M08/OLWG/82 - INQ000611582**. This 2010 guidance aimed to help teachers, health professionals, social workers, the police and other key practitioners in Wales to tackle sexual exploitation. The guidance also aimed to assist practitioners in identifying children at risk and equip them to protect these vulnerable children and to take action against the perpetrators. A summary of the responses to a formal consultation on revised statutory guidance on safeguarding children at risk of child sexual exploitation, is exhibited here at **M08/OLWG/83 - INQ000611544**. This was published in February 2020. Guidance for organisations on how to protect children at risk of child and sexual exploitation was published on 18 March 2021, which I exhibit here at **M08/OLWG/84 - INQ000611545**. The guidance was accompanied by an 'Easy Read' version and a 'Youth Friendly' version.

136. A further action, arising from the online safety action plan, was the development of all Wales practice guidance on safeguarding children at risk of online abuse, which I exhibit previously at **M08/OLWG/61 - INQ000611549**. The guidance is also referenced in the updated *'Keeping Learners Safe'* guidance, published in 2020.

137. The online safety action plan also committed the Welsh Government to maintaining the recommended web filtering standards for schools in Wales. The web filtering standards are a common set of agreed standards that provide schools with the information to make informed choices about what content categories are appropriate for their different users, including children and young people. The standards support schools to be fit for twenty-first century learning and teaching while safeguarding children and young people. The *'Recommended web filtering standards for schools in Wales'* document was updated and published in February 2018, exhibited previously as **M08/OLWG/43 - INQ000611592**. A

further area for consideration under the 2017 action plan was to review and revise the non-statutory anti-bullying guidance, '*Respecting others: Anti-Bullying Guidance*', which includes advice on tackling online bullying in schools. The original guidance had been published in 2003 to help tackle bullying in schools in Wales. In 2011, the guidance was updated and expanded to address five key areas of bullying including online bullying, see exhibit **M08/OLWG/85 - INQ000611550**. As part of that review the Welsh Government worked closely with the South West Grid for Learning to ensure that the online bullying aspects of guidance linked closely with the broader aims of online safety. In November 2019, a suite of anti-bullying guidance was published, which I exhibit here at **M08/OLWG/86 - INQ000611548**, this was statutory guidance for both governing bodies of maintained schools and local authorities to help them address and prevent bullying in education settings. The suite also included advisory guidance for children, young people and their parents and carers to help those affected by bullying, outlining rights and responsibilities. An online toolkit playlist of resources, which I exhibit here at **M08/OLWG/87 - INQ000611547**, was also produced in order to support the practical implementation of the guidance.

138. The Welsh Government had published guidance in 2017 as part of the UK Council for Internet Safety's Education Working Group regarding responding to incidents of sharing nude and semi-nude images (sexting), which I exhibit here at **M08/OLWG/88 - INQ000611597**. As part of the 2017 action plan, the guidance was refreshed in consultation with the National Police Chiefs Council, the All-Wales School Liaison Core Programme, the South West Grid for Learning, the National Society for the Prevention of Cruelty to Children, regional consortia, the Safeguarding in Education Group, Estyn and other interested parties. The guidance aimed to support schools, colleges and other educational settings in developing procedures to respond to incidents involving the sharing of nudes and semi-nudes. In December 2020 the refreshed guidance was published, which I exhibit here at **M08/OLWG/89 - INQ000611556**. A webinar for practitioners to assist in understanding of the guidance was also hosted by the Welsh Government in January 2021 and remains available to view on the Hwb website. In order to further embed the guidance, an online training module was published in October 2021 to support the designated safeguarding person and senior managers to ensure an appropriate and proportionate response to an incident of this nature.

139. A further point of action from the 2017 action plan was in relation to the rise in online challenges and hoaxes on social media, the potential serious harm arising from this, and the need to develop and promote guidance in this area. In October 2021, the Welsh

Government published the guidance ‘*Advice for schools on preparing for and responding to viral online harmful challenges and hoaxes*’, which I exhibit here at **M08/OLWG/90 - INQ000611587**. The guidance is of relevance for all staff in a school and it is particularly pertinent for designated safeguarding persons and the senior leadership team. The guidance was developed to safeguard children and young people, but also included advice to support the management of incidents by schools and their staff. This guidance, which I exhibit here at **M08/OLWG/91 - INQ000611573** was kept under review and updated further in March 2023.

Summary of other initiatives / actions / mitigations / guidance

140. A new Welsh Government campaign, Teulu Cymru, was launched in April 2024, bringing together advice and support for families and parents. Social media posts under Teulu Cymru, continue to focus on supporting children’s behaviour, linking in with the alternatives of physical punishment, the importance of routines, promoting the benefits of healthy screen time use and regularly promote Hwb’s online safety resources for parents and families. I exhibit here at **M08/OLWG/92 - INQ000611586**, an overview of the current content available through this resource.

141. The Welsh Government continues to support and promote Safer Internet Day Online, an annual campaign which prompts an international conversation and promotes a safe digital environment for children and young people. Each year Safer Internet Day raises awareness of emerging online safety issues such as cyberbullying, hate speech, misuse of data and exposure to harmful content. Coordinated in the UK by the UK Safer Internet Centre the initiative sees hundreds of organisations get involved to help promote the safe, responsible and positive use of digital technology for children and young people. Each year the Welsh Government promotes Welsh specific Safer Internet Day themes, activities and competitions via the Hwb website.

Misinformation / Disinformation

142. The Welsh Government uses social listening tools to understand broader themes of discussion on social media, which may sometimes include misinformation and/or disinformation. Taking action on harmful information on social media – particularly within the context of public health or national security – typically falls to UK-wide bodies such as the UK Government, its relevant departments and national regulators like Ofcom. The Welsh Government follows best practice guidance provided by the UK Government

communication service when developing responses to misinformation and/or disinformation.

143. Based on the social listening data collected during the pandemic, the Welsh Government was not aware of any particular instances of misinformation and/or disinformation which were targeted at children or were engaged with, by children.
144. Although the Welsh Government took steps to communicate accurate and timely public health advice, its role was focused on providing trusted information, publicly correcting misinformation, where necessary. Daily social media monitoring was undertaken to help gauge understanding of key messages with the public, which was in turn used to improve the Welsh Government's communications. In the course of social media monitoring, the Welsh Government were occasionally able to identify false or misleading narratives, which may have been gaining traction, for example, narratives relating to vaccines and face masks. This information was used to inform a daily "hot issue" report to be shared with senior officials to develop responses where necessary. However, nothing was specifically focused on, or targeted at, children and young people.
145. The Welsh Government carried out social media monitoring using standard social listening tools which provide general, non-personally identifiable information about online discussions, trends and themes, alongside analysis of comments on Welsh Government social media channels.
146. During the pandemic focus groups were run centrally and were focused mainly on general awareness and perceptions around Covid-19. For example, on 30 July 2020 a research report was published: *'Welsh Government: Creative testing with 16–24-year olds'*. This summarised the results of focus groups which looked at potential creative routes for a campaign targeted at young people to encourage adherence to social distancing guidelines. I exhibit the report here at **M08/OLWG/93 - INQ000610589**. The Welsh Government did not run any specific campaigns on misinformation or disinformation specific to children.
147. As part of the broader Keeping Safe Online area of the Hwb website, the Welsh Government developed dedicated resources, guidance and information on misinformation for schools in March 2021. I exhibit this at **M08/OLWG/94 - INQ000610591**. This repository includes a collection of resources which explores what misinformation is, why people share unreliable information and information to support children and young people to critically evaluate what they see and hear online. It includes a variety of materials that can be

tailored to different settings and audiences, for example primary age children and secondary age students. Further specific advice for children and young people was developed in July 2023 and again published on the Hwb website focusing on online issues and worries, fake news and misinformation. I exhibit that here at **M08/OLWG/95 - INQ000610592**.

Part C – Post pandemic

148. The Hwb platform is designed specifically to support the safe use of technology by children and young people, offering support on a community approach. The Welsh Government's advice, guidance and resources are continually reviewed to respond to emerging trends or challenges. The supporting Digital Resilience in Education Action Plan sets out the 90 activities designed to enhance and support online safety and the digital resilience of children and young people in Wales. It is updated on an annual basis and therefore offers a summary of activity against each action since its original creation in 2018.
149. The Welsh Government 2025 student behaviour survey published on 21 May 2025, exhibited here at **M08/OLWG/96 - INQ000611566** highlighted that in secondary schools, 75.1% of staff had reported serious concerns over device distraction. In primary schools, this figure was lower, at 17%.
150. The Welsh Government is exploring the link between the use of technology and development and in particular screen time in the speech, language and communication development of 5–8-year-olds, that report is expected in autumn 2025.
151. The Welsh Government is also undertaking a review of a pilot virtual online school in southwest Wales which offered online tutoring for approximately 50 disengaged students in years 7-11. This review is expected to report in autumn 2025.
152. Throughout the pandemic, independent experts, through impartial forums, indicated that there would be a general increase in non-designated content that is harmful to children. However, the Welsh Government is not aware of any measurable evidence to confirm this. The Welsh Government has not conducted any research in this area and none was identified by the independent experts.
153. In 2022, the Learning Continuity Board agreed that learning continuity guidance was to be developed for all schools to provide them with clear guidance on how children and young people should be supported to enable them to continue learning during any future

periods of disruption that result from school closures. The guidance included advice to practitioners on how to use online learning in the safest and most impactful ways. It also ensures that those students without access to online provision are supported equitably. Roles and responsibilities for all schools, including their responsibilities for digital safety, are set out clearly in this guidance. This includes guidance for practitioners, headteachers, governors, local authorities, regional consortia and partnerships, Estyn and the Welsh Government.

154. The Learning Continuity Guidance was published in November 2022 in line with the Emergency planning and response guidance for education and childcare settings, I exhibit it here at **M08/OLWG/97 - INQ000531846**. This guidance was last reviewed in April 2023. All schools in Wales are expected to develop learning continuity plans as part of their routine business contingency planning arrangements to support this.

Part D – Engagement with Ofcom

1 January 2015 to 31 December 2019

155. Since 2014 the Welsh Government has undertaken a programme of work to provide a range of online safety activities across Wales through the Hwb programme. Those activities include online training for education professionals and school governors, developing high quality bilingual resources to support children and young people (and parents/carers) with online safety resources.

1 January 2020 and 28 June 2022

156. Digital safety was identified as an area of concern at the outset of the pandemic in recognition of the need to move online learning and the risks which came with this.

June 2022 to date

157. By June 2022, the Welsh Government was well positioned with education technology to embed digital resilience throughout local authorities and regional consortia strategies to ensure students remained safe online.
158. The Welsh Government's Education Directorate work closely with Ofcom on media literacy and online safety and officials hold regular meetings with the Ofcom Wales team. Ofcom is considered to be one of our key partners and, since January 2022, the Welsh Government has been a member of Ofcom's Making Sense of Media network.

159. In 2022 and 2023, an Ofcom representative sat on the judging panel for our Safer Internet Day competitions and its Principal of Regulatory Affairs delivered a keynote speech at our Keeping Safe Online conference in March 2023. Ofcom have also participated in our annual Digital Resilience Symposiums since 2024, where we bring together relevant experts to discuss current and emerging issues. Attendance at the Symposium was also extended to members of the Keeping Safe Online Youth Group to ensure that the views of children and young people are heard and any safety measures are appropriate and in line with any emerging themes.
160. Since Ofcom became the online safety regulator in 2023, the Welsh Government have provided a contribution for each of their four consultations to date (Protecting people from illegal harms online, Guidance for service providers publishing pornographic content, Protecting children from harms online and A safer life online for women and girls). The Welsh Government have also contributed to consultations and attended events on their media literacy programme and their work plans.
161. Most recently in 2025, Ofcom hosted our Keeping Safe Online Youth Group for Safer Internet Day and the Welsh Government also became a member of its Children's Online Research Stakeholder Network.

Part E – Lessons Learned

162. Although the Welsh Government has conducted a number of lessons learned exercises as detailed in the M08/HSSGW/001, M08/EPSGW/001 and M08/ESNRG/001, the scope of those exercises is not within the scope of this particular Rule 9 request. As set out in this statement, the impact on children and young people's online lives spanned a number of devolved and reserved areas and there has not been a cross-cutting exercise that captures lessons learned in one place.
163. The impact of the Covid-19 pandemic on children and young people has been unprecedented and the Welsh Government is committed to working collaboratively with local authorities and school improvement partners to ensure that disruption on this scale is never experienced by our students again. It is essential that local authorities and schools continuously plan for future disruptions irrespective of the cause and ensure that the learning and well-being of all students is prioritised. To support this, the Welsh Government published the Learning Continuity Guidance in November 2022, exhibited previously at **M08/OLWG/97 - INQ000531846** in collaboration with organisations, including education unions, Estyn, the Welsh Local Government Association, the

Association of Directors of Education in Wales and school improvement partners. The guidance outlines the expectation for learning continuity planning to be prioritised in all schools to ensure schools are fully prepared and can continue to support the learning of children and young people throughout the period of disruption.

164. In my other module 8 statement, M08/EPGW/001, specifically the section 'General assessment of impact' found from paragraph 418 onwards, I have explained about the work undertaken by the Welsh Government post pandemic around the 'stay safe, stay learning' and 'continuity of learning' programmes, which included the impact of schools moving online and the subsequent impacts including on educational development.

165. Digital competence is a cross curricular skill at the heart of the Curriculum for Wales, while the disruption of the Covid-19 pandemic has led to an increased reliance on online services to deliver teaching and learning, the national Hwb digital learning platform has been designed to ensure that appropriate education online resources and services can be accessed in a simplified, safe, and secure ecosystem which can inspire and support schools to embrace and embed digital learning in the classroom and where appropriate, support learning at home.

Statement of Truth

I believe that the facts stated in this witness statement are true. I understand that proceedings may be brought against anyone who makes, or causes to be made, a false statement in a document verified by a statement of truth without an honest belief of its truth.

Signed:

Personal Data

Dated: 29 July 2025