

Niamh Hodnett
Online Safety Commissioner
Coimisiún na Meán
2–5 Warrington Place
Dublin 2, D02 XP29

30 January 2024

Dear Commissioner,

We, the undersigned groups, and organisations, call on Coimisiún na Meán to redraft the Online Safety Codes to address the issue of ‘legal but harmful content’ for persons of all ages.

The Codes in their current form fall short of fully addressing section 139 of the Online Safety and Media Regulations Act 2022 which does not identify harms or the provision of safety codes as something only for minors but indicates the codes are to make provisions for ‘all users.’

As a sector, we are deeply concerned by the lack of care and protection for persons over the age of 18 despite the well-documented prevalence of harms extending into adulthood in areas such as, but not limited to suicide/self-harm, eating disorders, and various form of cyberbullying.

The internet has the potential to be a powerful tool for good for people of all ages offering a space of belonging or a way to make connections with people you might not otherwise meet. The internet can also open a person up to cyberbullying and provide access to content that can be distressing, triggering, and in some cases of harm, instructive. These harms do not disappear on a person’s eighteenth birthday, and we urge Coimisiún na Meán to address this vulnerability and omission within the Codes.

Thorough helplines, advice pages, emails, webchats, and face-to-face – we are the groups and organisations that support people of all ages who often share the impact the internet has on their daily lives.

Many undersigned organisations submitted responses to the first call and will again reply to the latest consultation with submissions including firsthand accounts and experiences from people the codes, in their current form, will not protect. It is of the utmost importance and urgency you review and strongly consider these submissions and the many voices behind them.

The future of online safety will be shaped by the Codes being drafted now. We are here to work with you to help deliver what we believe can be our shared agenda – a safer internet for people of all ages.

Yours sincerely,



Sarah O'Toole

Sarah O'Toole
Executive Director
Samaritans Ireland



Ian Power

Ian Power
CEO
spunout



HEADLINE
Supporting media, changing attitudes

Aine O'Meara

Áine O'Meara
Headline Programme Lead
Headline



National Suicide Research Foundation

Eve Griffin

Dr. Eve Griffin
CEO
National Suicide Research Foundation



JIGSAW
Young people's health in mind

Joseph Duffy

Joseph Duffy
CEO
Jigsaw



Shine
Supporting people affected by mental ill health

Nicola Byrne

Nicola Byrne
CEO
Shine



Vivian Gerian
Chairperson
Irish Association of Social Workers



Fiona Coyle

Fiona Coyle
CEO
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Paula Fagan
CEO
LGBT Ireland

Kerry Cuskelly
Chair
Social Workers in Adult Mental Health
Special Interest Group
Irish Association of Social Workers



Sheila Gilheany
CEO
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National Women's Council
Doireann Crosson
Women's Health Coordinator
National Women's Council