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4<sup>th</sup> April 2025

Deputy Catherine Curtis  
Chair, Children, Education and Home Affairs Scrutiny Panel  
Scrutiny Office  
States Greffe  
Morier House  
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JE1 1DD

Dear Deputy Curtis

### **Protecting Children from Online Harms**

I write in response to your letter of 17<sup>th</sup> March 2025, requesting information from JT on its role as an internet service provider (ISP) in providing a line of defense against online harms. Our response is focused on the four areas of legislative, ethical, technological and financial challenges ISPs have.

### **Legal and Ethical**

The UK Digital Economy Act 2017 placed the requirement for ISP filtering into law. Jersey does not have a similar legislation mirroring the UK legislation and therefore ISPs do not have a legal basis on which to carry out any blocking or filtering. This puts ISPs in a difficult position, while morally we feel it is right to protect citizens, especially those that are considered vulnerable such as children, without legislation and specific guidelines and procedures in place, JT cannot make the decision on what should or should not be blocked.

There is a moral balance between blocking unacceptable/dangerous/illegal websites, whilst also ensuring ISPs do not open themselves up to criticism for restricting freedom of speech/access to information. ISPs are not in a position to make the decision themselves on what should be blocked and would rely on government to make the specific requests and provide guidance.

The UK Online Safety Act 2023 is focused on ensuring that online platform providers put controls in place to ensure age checks are carried out so that adult content is not accessed by under 18s. Ofcom published its children's assessment guidance and in-scope service providers must conduct their children's access assessment by 16 April 2025 to determine if their service is likely to be accessed by children. The platforms must also remove illegal content thereby protecting users from harmful content. As these requirements are on the platform provider, it will extend to children in Jersey accessing those platforms.


### **Technological and Financial**

JT do not carry out any ISP network level blocking/filtering and has limited ability to do much beyond blocking certain websites via our domain name system (DNS) servers. Essentially, blocking on the DNS server would result in a website being blocked to anyone utilising JT's DNS and they would not be able to lookup the particular address(s) that was blocked. The blocking of websites and services can restrict

access to some users however we need to be mindful that a determined user with the knowledge and ability can easily circumvent these blocks. It is entirely possible and common for an individual to utilise another DNS. For example, it is quite popular to use Google's (8.8.8.8, 8.8.4.4), enabling the user to get round the blocking and access the website. In addition, it is becoming increasingly likely that an educated user, aware of their own privacy and security, can use a personal VPN to circumvent the most common approaches to blocking access to websites and services. There are better ways of ensuring blocking but this would require significant investment into systems to do this.

I hope the above is helpful however should you wish to discuss anything in more detail please do not hesitate to get in contact.

Yours sincerely

DocuSigned by:  
  
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**CAROL GUNASEKARA**  
**HEAD OF REGULATORY COMPLIANCE AND DATA PROTECTION**