

STATES OF JERSEY



DRAFT DIRECTOR DISQUALIFICATION SANCTIONS (JERSEY) AMENDMENT LAW 202- (P.25/2026): COMMENTS

**Presented to the States on 20th March 2026
by the Economic and International Affairs Scrutiny Panel**

STATES GREFFE

COMMENTS

Background

The Director Disqualification Sanctions (Jersey) Amendment Law 202- [\[P.25/2026\]](#) (the Proposition) was lodged *au Greffe* on 5th February 2026 by the Minister for External Relations (the Minister) and is scheduled for debate on 24th March 2026.

The context and rationale behind the changes being sought by the Minister are set out clearly in the report accompanying the Proposition.

Panel Observations

The Panel asked questions relating to the Proposition during a briefing with Government Officers on 10th February 2026 and during the Quarterly [Hearing](#) with the Minister for External Relations on 11th February 2026.

It understands that this is, in effect, a routine correction to an oversight in a recent set of related revisions brought about through [P.106/2025 Companies \(Jersey\) Amendment Law](#). Approved by the Assembly in January 2026, P.106 provided for the automatic *removal* of a director of a Jersey company, or a manager of a Jersey limited liability company (LLC), who becomes subject to a UK director disqualification sanctions designation. However, it did not contain provision for a person subject to such a designation from being *appointed* to those positions. The Proposition, if adopted, will extend the prohibition to include appointments, which the Panel welcomes.

Exemptions under licence

The Panel was informed that, in some cases, a disqualified person may still need to be appointed to the position of director or manager of an LLC in order to perform specific actions that prevent harm to unrelated businesses or ensure compliance with legal requirements.

The Panel was told the proposition would provide that such exemptions could be made through licensing provisions in the [Sanctions and Asset-Freezing \(Implementation of External Sanctions\) \(Jersey\) Order 2021](#). During the hearing, the Panel was told that the inclusion of a licensing mechanism is consistent with equivalent UK legislation. It was also confirmed that licences issued under the 2021 Order are granted only for a limited time and for a defined purpose, and that licence holders are monitored by the government.

The Panel is satisfied with rationale for allowing the Minister to issue temporary exemptions under licence, along with the assurances provided regarding the monitoring of licence holders.

Conclusion

The Panel is supportive of the Proposition.