

# Critical Infrastructure Resilience – Transport Links

August 2025

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### **Report by the Comptroller and Auditor General: August 2025**

**This report has been prepared in accordance with Article 20 of the Comptroller and Auditor General (Jersey) Law 2014.**

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# Summary

## Introduction

1. National Infrastructure are those facilities, systems, sites, information, people, networks and processes necessary for a jurisdiction to function and upon which daily life depends. Not everything within a national infrastructure sector is judged to be 'critical'. Jersey's critical infrastructure can be described as those physical facilities, supply chains, information technologies and communication networks which, if destroyed, degraded or rendered unavailable for an extended period, would significantly impact the social or economic wellbeing of Jersey or affect Jersey's ability to ensure national security.
2. There are broadly twelve sectors that could be considered to be critical infrastructure for Jersey as shown in Exhibit 1.

### Exhibit 1: Jersey's critical infrastructure sectors

|                      |           |             |
|----------------------|-----------|-------------|
| • Chemicals          | • Energy  | • Space     |
| • Communications     | • Finance | • Transport |
| • Defence            | • Food    | • Waste     |
| • Emergency Services | • Health  | • Water     |

3. Critical infrastructure systems within these sectors are particularly vulnerable to being damaged or disrupted. A disruption to any of the critical infrastructure systems can have serious implications for business, government and the community. Chronic infrastructure challenges such as ageing and/or poor maintenance increase the risks of inadequate service provisions and can worsen the impact of issues and threats when they arise.
4. Ensuring the security and resilience of Jersey's critical infrastructure is a responsibility shared by the States, infrastructure owners and operators. Each have different responsibilities for critical infrastructure depending on the system and/or the nature of the threats to be mitigated. Responses to a threat can involve the asset owner and operator, the technical and operational lead for Government and emergency services or law enforcement. Co-ordination among entities is therefore required to prepare, rehearse and respond to critical infrastructure threats.

5. Significant public funds can be spent responding to emergencies relating to critical infrastructure. It is important for Jersey to have in place an effective resilience framework supported by effective resilience plans and procedures across the States, asset owners and operators.
6. The resilience of transport infrastructure and connectivity is especially important in the Jersey context due to the need to use transport to ensure the supply and delivery of vital goods and services to Islanders and for enabling Islanders to access critical mainland services.
7. In 2024 the Government undertook significant tender exercises in respect of ferry links and bus services. In addition, over recent years the Government has provided support, through a loan, to Blue Islands which is responsible for a number of air links to the Island and is one of the airlines providing key non-emergency patient travel.

## Key Findings

### Overall approach to Critical Infrastructure Resilience

8. There is no definition of critical national infrastructure in the Island and no cross-cutting infrastructure policy. Depending on the roles and responsibilities of officers, there were different views on what is or is not considered to be critical. This increases the risk that different elements of the resilience response will prioritise transport links inconsistently.
9. The Jersey Resilience Forum (JRF) is a multi-agency organisation that brings together those who have a role to play in an emergency response from within and outside the Government. Since my June 2024 Report, officers and other JRF members have worked together to improve the overall effectiveness of the JRF, but there is more to do.
10. Significant progress has been made in the last year to develop the Jersey Emergency Risk Register (JERR) into a tool that can be used to manage high level risks to Jersey that, if realised, would give rise to a major incident. The JERR though is not yet a practical document that all those in the resilience community can, to the extent they need to, own and use.
11. There has been a pause in drafting of the new Resilience Law and alongside this there has been a pause in further developing Resilience Standards. While the Standards, having been rolled out, remain 'live', they have not yet been refined to meet Jersey's specific needs and there is no supporting Law to require compliance. The JRF is not meaningfully focussed on whether and how they are

being used in practice, which risks diminishing their status in the eyes of the emergency response community.

### **The role of Ports of Jersey**

12. The operational management of both the airport and harbour and the associated infrastructure and systems is heavily regulated. A record of compliance with independent regulatory review processes contributes to resilience. The latest Ports of Jersey annual report confirmed that all compliance audits were completed without any significant non-conformities being recorded.
13. Ports of Jersey also relies on internal resources to provide assurance in respect of cyber-security, data protection, risk management and business continuity. During March 2025 an overnight threat to the airport was not immediately noted due to the e-mail system not being monitored when the airport is closed.
14. The Airport Master Plan and Harbour Master Plan both include elements to enhance resilience as well as improving passenger experiences as these are delivered over the next few years.

### **Sea Connectivity**

15. The Government has a low risk appetite for disruption to sea transport due to the requirements for food, fuel and pharmaceuticals, 98% of which come to Jersey by sea.
16. On 15 December 2023, it was concluded that contingency ferry arrangements needed to be established in case of the then operator's financial situation worsening. Jersey continued to fund the contingency arrangement until the end of March 2025. On 13 March 2025 the Minister for Sustainable Economic Development, in response to a question from the Economic and International Affairs Scrutiny Panel in a public hearing focussing on ferry services, noted that to that date the cost to Jersey was approximately £5 million.
17. A new ferry provider was engaged to operate the freight and passenger services between the Island, the UK and France, from late March 2025. The procurement process started as a joint exercise with the States of Guernsey but later took a different direction and both Governments concluded separate processes.
18. In the single-Island tender, the Government of Jersey made a decision to award a longer term concession agreement than had been specified for the joint exercise. However, no formal assessment of the impact, benefits and risks was documented. The decision to award a 20-year contract has committed the States to an exclusive provider for a period a third longer than was originally specified.

19. The agreement with the new ferry service provider did not include an inter-island ferry service. While this was understood, there is no documented impact assessment against risk appetite to underpin this decision. Instead, the significant reduction in inter-Island provision was accepted in the short term without the 'value added' being fully evaluated. Steps have since been taken to establish an increase in ferry connectivity between Jersey and Guernsey.

## **Air Links**

20. Jersey has an 'Open Skies' policy and a diverse air route network which contributes to resilience. This covers hub connections, regional links, tourist routes and charter routes. Alongside connections to London, the connectivity to regional airports, which is provided by Blue Islands (and some other airlines), is regarded as important by the Government and by Ports of Jersey. Blue Islands services are key to the ability of Islanders to attend healthcare appointments in the UK. In addition, Blue Islands maintains an inter-Island air bridge with Guernsey. Blue Islands has a small fleet (five aircraft) and this presents an inherent risk to resilience.
21. The Government provided £8.5 million in loan funding to Blue Islands during the COVID-19 pandemic to secure and maintain vital lifeline services. The repayment schedule for this loan was restructured in June 2024 to extend the repayment period to December 2028. At 30 June 2025, the outstanding capital balance was £7 million. Evidence is lacking to demonstrate adequate monitoring against Key Performance Indicators (KPIs) by the Government during the period of the loan outside of the attendance as observers at Blue Islands Board meetings by representatives from Treasury and Exchequer, and Ports of Jersey.

## **Air ambulance**

22. The Jersey Emergency Transfer Service (JETS) is currently operated under a contract with an air ambulance provider which is also under contract with Guernsey. In June 2020 each Island signed a five year contract. Both Islands extended the contract in November 2024, to run from June 2025 to May 2026.
23. That JETS is a critical transport link for Jersey is undeniable. The number of transfer requests has been increasing, the acuity of patients being transferred is generally higher, but the air ambulance service provided has in some cases not shown resilience, particularly in the recent past. In this context it is crucial that HCJ properly understands its risk appetite – that is, the level of risk it is willing to hold. It is equally crucial that, once a specification is agreed, oversight and reporting arrangements are adequate to manage the inherent risks in line with HCJ's risk appetite.

## Bus links

24. The Island bus service contract was re-awarded to LibertyBus for ten years from April 2025, following a 2024 procurement exercise. The procurement process, once started, followed good practice and concluded with identification of a preferred bidder in September 2024. However, due to consideration of issues raised by the Minister for Infrastructure and other delays, the contract was not signed until 16 January 2025. Following this, by way of a Ministerial Decision, a contract variation has been implemented to pilot an East to West bus service. The pilot service is expected to cost £180,000 a year and has been funded by the Climate Emergency Fund. To date, I have not seen any evaluation criteria which could be used to demonstrate, or at least to monitor, whether using the Climate Emergency Fund for the piloting of this service supports the Fund's aims and represents value for money.

## Highways infrastructure

25. Investment in highway maintenance in recent years has been below the desirable level to maintain a steady state for road condition. An updated condition survey in February 2025 shows 4% of Class 1 roads (Protected Routes (167 miles of the Island's 613 miles of roads)) had structural and severe surface impairment and 6% had functional impairment. 51% of Class 1 roads were described as 'serviceable'.

## Conclusions

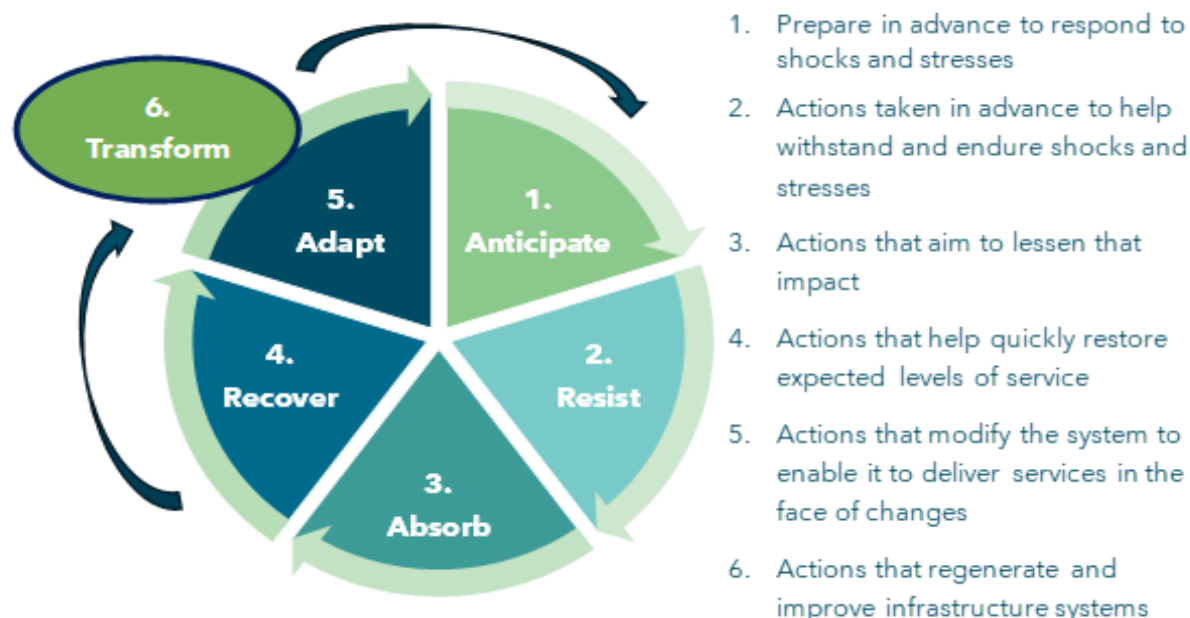
26. A framework of Standards has been developed to promote and support Island-wide resilience under a proposed new Resilience Law. However, this work has been paused. While a decision is awaited on a potential legislative timetable, there is an opportunity for the JRF to work with all stakeholders, including owners and operators of critical transport infrastructure, to refine and then embed standards which will enhance controls, better support management of risk, provide assurance and promote resilience.
27. New arrangements have been or are due to be put in place for critical ferry, air, air ambulance and bus services. It is important to monitor provision of these critical services more effectively to ensure transport link resilience.

# Objectives and scope of the audit

28. The first Phase of my audit, reported in June 2024, looked at the energy sector. This audit has focussed on transport links. It has assessed the resilience of the Island's critical transport infrastructure, including ferry, air, bus and road networks. It also followed up on overarching resilience actions that the Government committed to following my Phase one Report.
29. This audit has evaluated whether the Government has an effective approach to ensuring the resilience of its transport infrastructure, including ferry, air, bus and road network links. It has evaluated, for each transport sub-sector, whether:
- arrangements are in place to ensure there is sufficient transport connectivity to and from the Island and within the Island, including:
    - appropriate tender and contracting arrangements for ferry, bus and air ambulance services
    - air connectivity arrangements; and
    - highways network plans
  - potential critical incidents, other problems and vulnerabilities affecting transport infrastructure are well identified, agreed and risk assessed
  - governance arrangements in place to administer critical infrastructure protection policies (policies aimed at reducing the vulnerabilities of and increasing the resilience of critical infrastructure):
    - are effective in delivering the States of Jersey's objectives and intended outcomes; and
    - achieve 'best practice' performance; and
  - the underpinning systems and processes – for example resilience plans, testing and compliance activities – are:
    - in place across Government, asset owners and operators and are properly monitored
    - consistent with delivering critical infrastructure protection objectives; and
    - in line with best practice.

30. The audit criteria I have used are drawn from UK's National Infrastructure Commission (NIC)<sup>1</sup> May 2020 review of the UK's economic infrastructure: *Anticipate, React, Recover*. This considered six elements of resilience (see Exhibit 2).

### Exhibit 2: UK National Infrastructure Commission's six elements of resilience



Source: [Anticipate-React-Recover-28-May-2020.pdf \(nic.org.uk\)](#)

31. Exhibit 3 shows the Jersey Audit Office's (JAO's) adapted description and enablers for these six elements of resilience.

### Exhibit 3: Description and enablers for the six elements

| Element           | Description and example                                                                                                                                                                                                                                                                      | Enablers                                                                                                           |
|-------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------|
| <b>Anticipate</b> | Actions to prepare in advance to ensure there is a sufficient transport network that can respond to shocks and stresses. Might include letting contracts for transport provision, due diligence on transport providers, collecting data on the condition of assets, contingency arrangements | Ensuring right incentives and accountability for resilience<br><br>High quality data available, monitored and used |
| <b>Resist</b>     | Actions taken in advance to help withstand or endure shocks and stresses to prevent impact on infrastructure such as building resilient ports facilities                                                                                                                                     | Effective risk identification, management and mitigation                                                           |
| <b>Absorb</b>     | Actions that, accepting there will be or has been an impact on infrastructure services, aim to lessen that impact, such as putting in place standby contingency call off arrangements                                                                                                        | Testing for vulnerabilities                                                                                        |

| Element          | Description and example                                                                                                                                                         | Enablers                                                     |
|------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------|
| <b>Recover</b>   | Actions that help to quickly restore expected levels of service following an event, such as procedures to restart services following loss of power                              | Relevant and high quality data available, monitored and used |
| <b>Adapt</b>     | Actions that modify the system to enable it to continue to deliver services in the face of changes, for example - storage in electricity system to support renewable generation | Driving adaptation and valuing resilience properly           |
| <b>Transform</b> | Actions that regenerate and improve infrastructure systems, for example transforming infrastructure to meet the net zero target                                                 |                                                              |

Source: [Adapted from Anticipate-React-Recover-28-May-2020.pdf \(nic.org.uk\)](#)

32. For each of the six elements, my audit considered actions taken by Government in respect of ferry, air, bus and road infrastructure and whether those actions ensure key enablers for resilience are in place.
33. Across the six elements, key questions were:
- Are the risks and vulnerabilities in each critical infrastructure system understood and owned?
  - Are the approaches to business continuity and other risk management agreed, jointly implemented and in line with best practice?
  - Are high quality resilience standards agreed and set, with SMART Key Performance Indicators and aligned targets and tolerance?
  - Are there effective arrangements for monitoring, reporting and scrutinising performance information by the operator/owner and by the Government of Jersey?
  - Are actions taken in response to performance monitoring? Is there follow-through?
  - Are assumptions underpinning risk assessments routinely challenged, tested and updated?
  - Are systems tested for vulnerabilities with a clear understanding of what constitutes failure / near miss?
  - What actions have been taken in response to any failures/near misses?

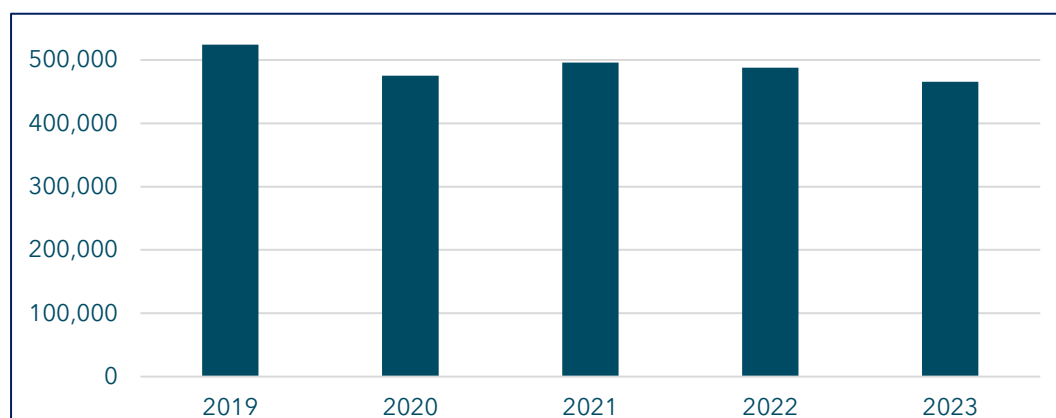
## Scope of the transport links considered

34. My audit looked at the resilience of the critical infrastructure in terms of both transport services to and from the Island (by sea and by air) and on-Island (bus services and the highways network).

### Sea

35. The vast majority (98%) of imports to the Island arrive through the Island's harbours. Most imports come from the northern ferry route from the UK, either on freight only ferries or those that carry both passengers and freight.
36. The Harbour Master awards an exclusive ramp permit for 'roll on, roll off' (Ro-Ro) freight services (in unaccompanied trailers) and for passenger services, between the Island and the UK and France. This sets minimum requirements for connectivity and is intended to ensure year-round provision, rather than running the risk of companies 'cherry picking' routes.
37. The most recent update to the to Sea Transport Policy (R.78/2025) presented to the States in May 2025 allows the Harbour Master to issue *'additional permits to Ro-Ro operators where those operators provide inter-island services between Jersey and the Bailiwick of Guernsey only'*.
38. The 'lift on, lift off' (Lo-Lo) freight services which carry around 30% of goods (often less time sensitive) to the harbour in containers, fuel containers and palletised cargo, are not subject to an exclusive permit.
39. Ro-Ro freight is broken down on arrival in Jersey for onward distribution. Ferryspeed is the main provider of freight logistic services, transporting between 75% and 90% of all Island freight, including all temperature controlled freight.
40. Freight and fuel volumes are relatively stable at just under 500,000 tonnes each year since 2019. While there are firm plans to develop harbour facilities over the next few years, these volumes are not expected to change significantly. Exhibit 4 shows the volumes from 2019 to 2023.

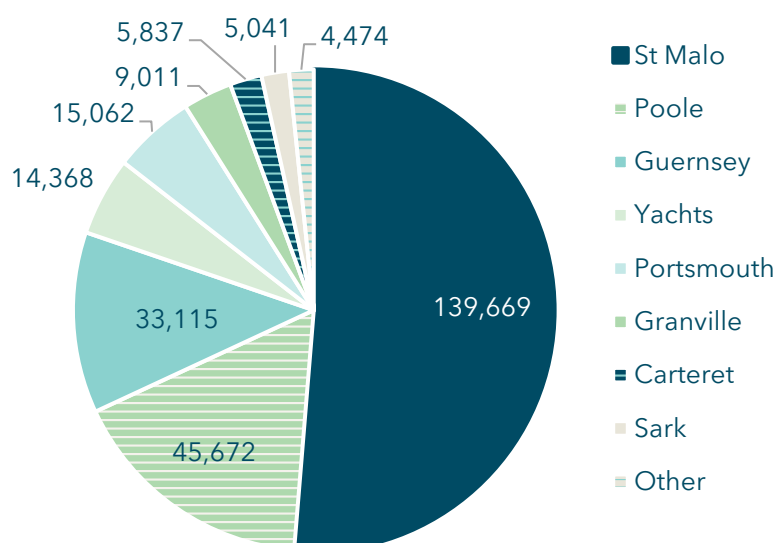
#### Exhibit 4: Freight and fuel volumes (tonnes) 2019 to 2023



Source: Ports of Jersey - Strategic Business Plan 2024-2028

41. During 2024, 272,000 passengers arrived into Jersey on sea routes, with more than half of those visitors coming from France (see Exhibit 5).

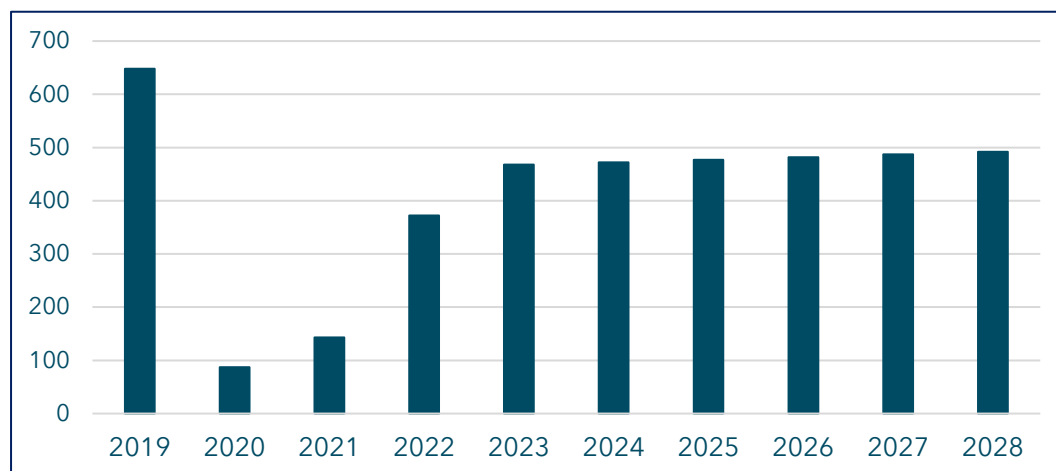
#### Exhibit 5: Arrivals into Jersey by sea 2024



Source: Visit Jersey monthly arrival statistics 2024

42. Ports of Jersey forecasts indicate that total passenger volumes in 2025 will be around 477,000, growing to 492,000 by 2028. This compares to a total of 648,000 in 2019 prior to the COVID-19 pandemic. Exhibit 6 shows the movements in actual numbers since 2019, alongside forecasts to 2028.

### Exhibit 6: Sea passengers since 2019 with forecasts to 2028 (000s)

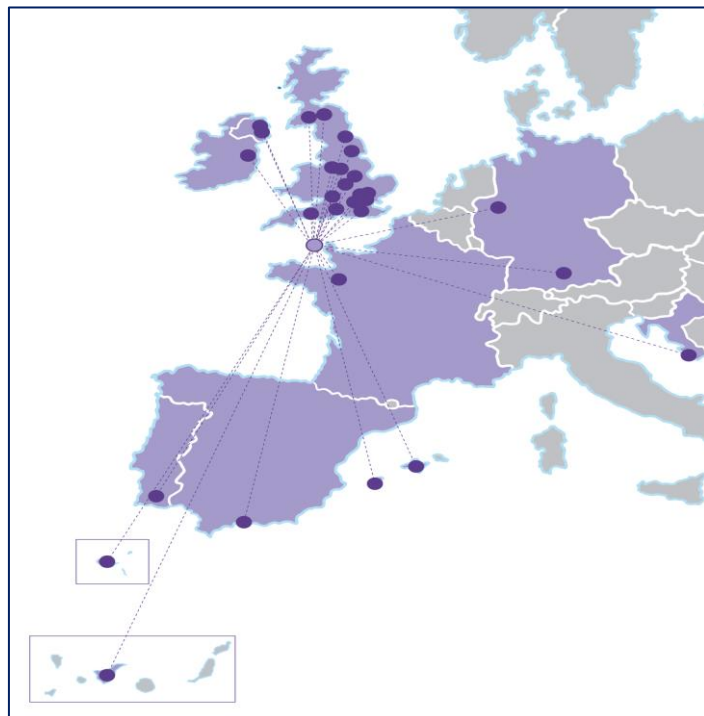


Source: Ports of Jersey - Strategic Business Plan 2024-2028

### Air

43. The total numbers of arrivals by air during 2024 was 732,000, from more than 50 airports in the UK and Europe. Exhibit 7 shows the main route coverage.

### Exhibit 7: Main air connections to Jersey

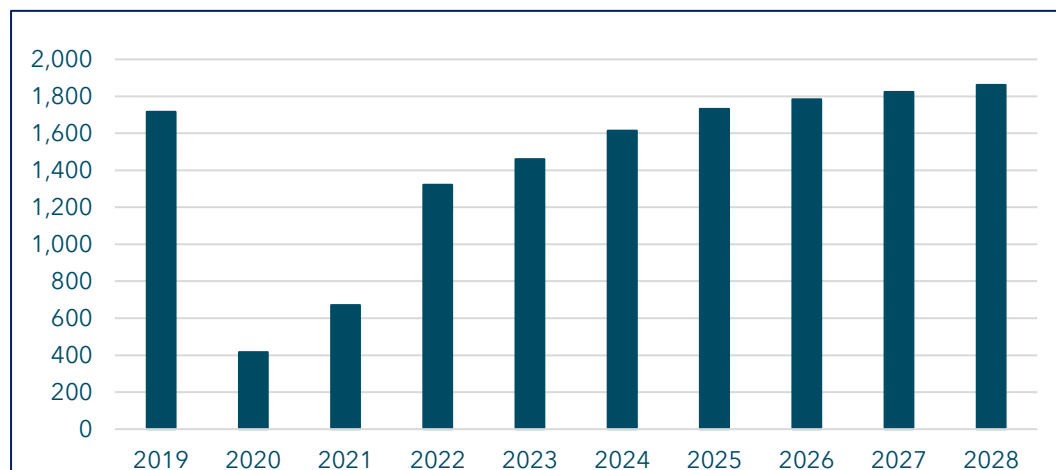


Source: Ports Policy Framework R.4/2024

44. In 2019 1.7 million passengers travelled through Jersey airport. The Ports of Jersey Strategic Business Plan (2024-2028) anticipated recovery to this level in 2025, with growth to two million passengers by 2030. Current data suggests that passenger numbers in 2025 are expected to be below the forecast. Exhibit 8 shows totals

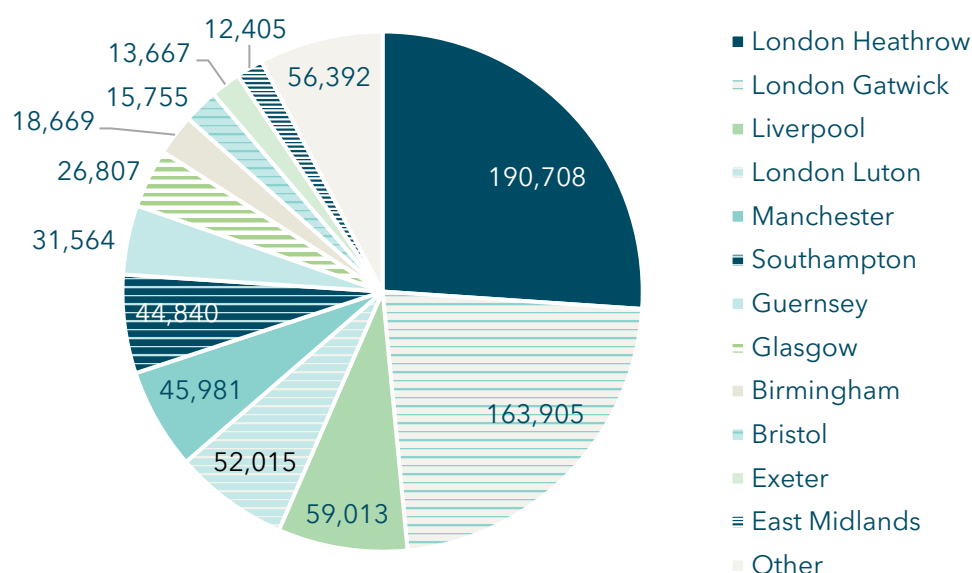
since 2019 and forecasts to 2028. The Ports of Jersey Annual Report for 2024 indicates that actual numbers were below the forecast of 1.61million passengers, at 1.46 million in 2024. Exhibit 9 shows the origin airports for 2024 arrivals.

**Exhibit 8: Air passengers since 2019 with forecast numbers to 2028 (000s)**



Source: Ports of Jersey – Strategic Business Plan 2024-2028

**Exhibit 9: Arrivals into Jersey by air in 2024, by airport of origin**



Source: Visit Jersey monthly arrival statistics 2024

45. In my audit of critical air transport infrastructure links, I have also considered the air ambulance service. This is managed by Health and Care Jersey (HCJ) by way of a specialist contract.
46. The number of patient transfers managed by the Jersey Emergency Transfer Service (JETS) for the last quarter of 2024 and the first quarter of 2025 averaged 28 each month. In each month, there were flights on 19 or 20 days. In some instances there have been four transfer requests in a single day.

## Bus

47. The Motor Traffic (Jersey) Law 1935 requires the Highways Authority to ensure that 'sufficient omnibus services are provided to satisfy all current and prospective demands'.
48. Following a competitive tender process in 2012, in 2013 the Government contracted with a single operator, LibertyBus, to provide both public network and school bus services. The contract was re-tendered in 2024 and LibertyBus was re-awarded the sole operator status from March 2025. The expected value of a ten year contract is in the region of £110 million including fare receipts and reimbursement by the Government of concessionary and young persons' fares. The cost to the Government was expected to be about £50 million, split between the following (2022 prices):
  - reimbursement of concessionary fares – £10 million (20%)
  - school bus network – £15 million (30%); and
  - remaining subsidy for public network – £25 million (50%).
49. At April 2025, the bus service comprised a fleet of about 78 buses and 185 employees, covering 25 public routes and 65 daily school journeys. Exhibit 10 shows the bus network.

### Exhibit 10: Jersey's bus routes – April 2025



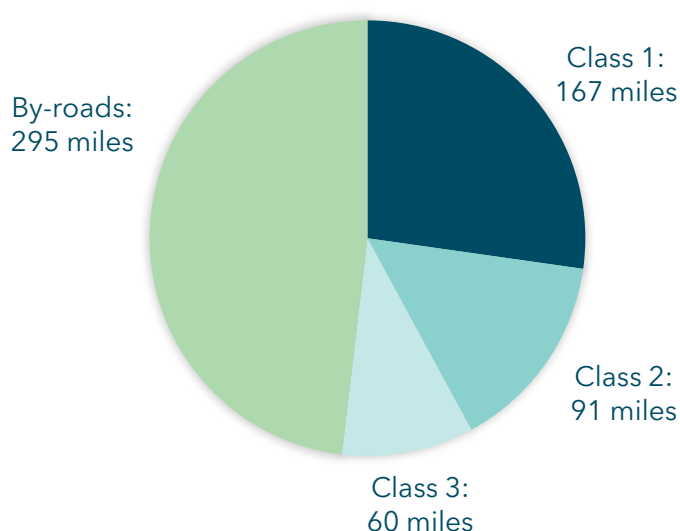
Source: Government of Jersey 'The Jersey Franchise – a Partnership Story', April 2025

50. The bus service operates from Liberty Station bus terminus and La Collette bus depot, both Government owned.

## Highways network

51. The highway network in Jersey includes roads owned and managed by the Government and those owned and managed by Parishes. Operationally there is a 'working hierarchy' of road categorisation. Class 1, 2 and 3 roads are owned and managed by the Government. By-roads are owned and managed by Parishes and are chiefly for access. These do however make up nearly half the total road network.
52. Exhibit 11 sets out road categorisation as at April 2025.

### Exhibit 11: Operational categorisation of Jersey's road network - April 2025



Source: Government of Jersey data April 2025

53. My audit has focussed on the Class 1, 2 and 3 roads but has considered the resilience arrangements for roads owned by Parishes.
54. La Loi Sur La Voirie 1914 Law sets out that the States of Jersey must appoint a Committee for the Administration of Main Roads. Currently, the States' Highways Authority is managed within the Infrastructure and Environment (I&E) Department.
55. In 2003 the Royal Court of Jersey stated that the Highways Authority had an absolute duty to ensure the road network was '*in such good repair as it renders it reasonably passable for the ordinary traffic of the neighbourhood at all seasons of the year without danger caused by its physical condition*'. For this to be achieved, the Royal Court made it clear that the Highways Authority '*must levy whatever rate is necessary for the purpose*'.
56. Within I&E, the Operations and Transport function has a stated aim that road conditions be 'appropriate, acceptable to the community and affordable, based on engineering and risk management principles to protect the public'.

## Detailed findings

# Overall approach to Critical Infrastructure Resilience

57. Appendix Two sets out the recommendations from my June 2024 Report *Critical Infrastructure Resilience – Energy* and my assessment of the States’ current position against these. Here I evaluate the overarching level of progress, including against these recommendations, and how this relates to what I have found in my audit of the critical infrastructure resilience of transport links.

### Definitions and shared view of critical infrastructure

58. There is no definition of critical national infrastructure in the Island and no cross-cutting infrastructure policy. In the course of interviews and document reviews, I found no clearly set out and commonly understood definition of critical infrastructure or criteria to identify these in regard to transport links. Depending on the roles and responsibilities of officers, there were different views on what is or is not considered to be critical. This increases the risk that different elements of the resilience response will prioritise transport links inconsistently.
59. In terms of **ferry services**, the most recently updated Sea Transport Policy (R78.2025) describes the ‘Northern Route’ currently served by Poole and Portsmouth to be *‘of critical strategic importance to Jersey because it is the Island’s main freight route’*. The Northern Route is *‘also of strategic importance to the Island’s visitor economy and islanders’*. It includes, *‘as an essential requirement, a Ro/Pax [roll on, roll off freight, car and passenger] vessel that provides resilience against inclement weather’*.
60. For **air transport**, the Government introduced an “Open Skies” policy in 2003 and subsequently repealed the Law which required airlines to be issued with permits and service level agreements to fly to and from Jersey. Since then carriers and routes are determined by market forces.
61. No air routes are designated as ‘lifeline’ routes. However, the route to Southampton, which is currently operated by Blue Islands, has characteristics of a ‘lifeline’ route. During the COVID-19 pandemic in June 2020, the Government agreed to provide a loan of £10 million to Blue Islands to ensure continuity of operations, £8.5 million of which was drawn on by Blue Islands to maintain vital lifeline services. The repayment schedule for this loan was restructured in June

2024 to extend the repayment period to December 2028. Amendments to this repayments schedule have subsequently been proposed. At 30 June 2025, the outstanding capital balance was £7 million.

- 62. In letting the **bus** service contract, requirements for specific routes and service frequencies, including for school buses, were set out. There is though no formal agreement between the Government and LibertyBus of what constitutes a critical bus route and which therefore needs to take priority should there be a resource issue.
- 63. There is no agreed definition of critical **road** infrastructure within the highway network. However, a 'managed network' is identified which is key to supporting emergency services. These roads are also the priority routes when gritting is required.

## Island-wide focus on resilience

### Jersey Resilience Forum

- 64. The Jersey Resilience Forum (JRF) is a multi-agency organisation that brings together those who have a role to play in an emergency response from within and outside the Government. The JRF comprises an executive (JRFE) and a delivery group (JRFDG), both of which have a Terms of Reference and a standing agenda.
- 65. In my previous report on energy resilience in 2024, I concluded that the JRF had not yet successfully made resilience feel like an Island-wide challenge where partners pick up proactive roles and responsibilities.
- 66. Since my June 2024 Report, officers and other JRF members have worked together to improve the overall effectiveness of the JRF, but there is more to do. I have found improvement difficult to evaluate as part of my audit as outputs of recent meetings have been recorded only in the form of action points on a spreadsheet. These do not do enough to capture levels of participation, evidence of challenge, decision making and follow through, all of which are crucial to demonstrate effectiveness of the JRF.
- 67. However, following its May 2025 meeting, the JRF Energy Resilience Working Group has produced a more comprehensive record. Given the nature of its focus and broad membership, it is especially important that the JRF and associated working groups maintain accurate records of attendance, participation, key information and evidence discussed, decisions made, actions to be taken and follow through on action.

68. There is a disconnect between the JRF and the Government Executive Leadership Team (ELT). There is no formal process for briefing the ELT on issues discussed at the JRF. From my review of JRF agendas, minutes and action plans in 2024 and 2025 to date, and from discussions with officers, there is little evidence of consideration of transport issues in recent months. This is despite there being significant corporate, strategic risk relating to transport in the last 12 months.

### **Jersey Emergency Risk Register**

69. My 2024 audit concluded that the then Community Risk Register, now the Jersey Emergency Risk Register (JERR) was not effective as a tool for an Island-wide focus on resilience priorities. It was out of date, lacked detail specific to Jersey and was not routinely monitored or reviewed. The disconnect with ELT also means that engagement with the JERR was, and remains, limited at Government corporate level.
70. Significant progress has been made in the last year to develop the JERR into a tool that can be used to manage high level risks to Jersey that, if realised, would give rise to a major incident. The JRF Risk Working Group was reformed to oversee the launch of the JERR, which has been published within the JRF membership. As at May 2025 the JERR contained 80 risks, each assessed against UK Government's National Security Risk Assessment.
71. Future plans for the JERR include ensuring all local risks are included, that there is a public facing version of the register, and that a peer review is undertaken.
72. The JERR though is not yet a practical document that all those in the resilience community can, to the extent they need to, own and use. Considering risks within resilience of transport links as an example, I have identified areas for improvement.
- Early stakeholder confidence in and ownership of the JERR is important and might be hampered by the fact that, in some areas including in considering the risks a storm might present, the section on local capability and capacity describes resources in Guernsey, not Jersey. Ensuring a clear understanding of what the local response looks like and how it can be engaged to reduce risk is crucial to making this a 'living' and owned document.
  - An important element of an entity's response to a forecast incident, for example snow or a storm, is an Emergency Preparedness Plan (EPP). These describe the actions to be undertaken to reduce the likelihood of a critical incident. While an operational plan for severe weather response is in place, as at February 2025, the I&E Department noted the following progress against specific EPPs:
    - Coastal Flooding - complete

- Inland Flooding – 80% complete
- Snow and Ice – not started
- Wind and Gales – not started
- Property Business continuity – not started.
- Linked to the role and importance of EPPs, there is opportunity for the JERR to make clear how ‘chronic’ risks need to be managed through, for example, Business Continuity Plans, and how these work together with the ‘acute’ risks which might require an emergency response.
- The JERR can be further refined by liaising with key risk owners (for example the Airport Director and Harbour Master) to ensure that:
  - all transport related risks relevant to the JERR are captured
  - risk scoring is appropriate to the risk in question and in the local context
  - controls are in place; and
  - roles are clear in monitoring and mitigating risks.
- ELT should be familiar with the JERR to:
  - confirm and keep updated the department-level local capability and capacity as set out in mitigation of risks; and
  - understand its obligations in the context of the responsibilities of the Duty Executive Officer role.

73. Capacity in the Emergency Planning Office team has been enhanced since my 2024 audit by way of three officers, seconded to the end of 2025. This has increased the available team from 1.5 full time equivalent (FTE) to 4.5 FTE.

### **Resilience Standards**

74. In my Report on *Critical Infrastructure Resilience – Energy* (June 2024) I noted that, in anticipation of a new Resilience Law, the JRF had introduced a set of Resilience Standards. These were developed from the UK National Resilience Standards and introduced new duties on all those likely to be engaged in an emergency response. While I noted the Standards were thorough and based on best practice, I concluded that there was work to do to make sure they represented a proportionate approach for Jersey. I also reported there remained a considerable lack of awareness or ownership of the Standards in responder organisations.

75. At the time of my 2024 Report, I had understood that the JRF intended to address these concerns and so I included the action needed under the heading 'Work planned that should be prioritised'. As part of my audit of transport links, I have sought to follow up on progress but, alongside the pause in drafting of the new Resilience Law, there has been a pause in further developing the Standards.
76. The Standards, having been rolled out, remain 'live' but they have not yet been refined to meet Jersey's specific needs and there is no supporting Law to require compliance. The JRF is not meaningfully focussed on whether and how they are being used in practice, which risks diminishing their status in the eyes of the emergency response community.
77. The Government is responsible for awarding contracts and concessions to provide critical transport links for Islanders in three key areas: some ferry services, the air ambulance service and the bus service. None of these contracts specifically note the need for the owners or operators of transport infrastructure to be compliant with the JRF's Resilience Standards or the duty to provide supporting information.

## Learning from previous incidents

### Learning from the COVID-19 pandemic

78. In 2024 I reported that, in July 2023, the Government had issued a Crisis Resilience Improvement Plan (CRIP), chiefly in response to an independent review of the Government's management of the COVID-19 pandemic. In May 2025 an updated CRIP was published, noting progress to February 2025 and future actions planned. There remain however findings from the independent review of the Government's management of the COVID-19 pandemic that are yet to be addressed:
- Ministers and other States Members have not been requested to take part in emergency planning training or rehearsals. This is a weakness in the overall approach and sends the wrong message about the importance of joined up leadership
  - the Chief Executive does not provide yearly advice to Ministers about minimum levels of provision for essential services and the Government Plan process does not include explicit assurance to the Council of Ministers on minimum levels of provision for essential services. Identifying and providing explicit assurance on minimum levels of service, including in terms of transport links for Jersey, would provide the States with information against which to determine its critical national infrastructure. This would support more targeted resilience planning and risk management, and in turn help improve value for money in use of Island-wide resources; and

- Ministerial, senior staff and interagency roles are still not fully defined with work on the proposition for a new Civil Contingencies Law (proposed to be named the Resilience Law) paused. There is a stated intention to develop policy proposals and instructions so that the new Resilience Law is ready for lodging soon after the 2026 election. I have not however identified a clear workplan or timetable for this development of the policy proposals and drafting instructions.

## **Learning from other major incidents**

79. Following each major incident that Jersey has faced in the last five years, a de-brief session has been held to understand what lessons can be learned. I reported in June 2024 that there remained a great deal to do to bring that learning into effect.
80. A 'rolling' action plan is now in place but this needs to be more robust to provide confidence that lessons are being learned. Actions do not typically have a due date and even those identified as 'high impact' do not always have an owner.
81. The mechanism to ensure that feedback from those who participate in critical incidents is captured in the rolling de-brief action plan needs improvement. Currently, the de-brief is undertaken at a facilitated meeting. However, this risks other feedback (such as written feedback) being missed.
82. For example, the I&E Department's Operations and Transport function set out in a report, following Storm Ciaran, that there were times when individuals were called on to operate outside identified roles and responsibilities. Staff were in some cases undertaking tasks – such as clearing highways of fallen trees in the dark – that they had not been risk assessed to safely deliver. Recognising that a lot of Islanders had an 'all hands to the pump' approach, it is nonetheless important to aim to reduce future risk. I have not though been able to follow through how the rolling de-brief action plan addressed the content of this report.

## **Recommendations**

- R1** Agree a definition of Island critical infrastructure. This should include critical transport infrastructure for sea, air and on-Island transport and the routes which fall within this definition.
- R2** Ensure that Ministers and (as relevant) other States Members are invited to participate in training and exercises for emergency response, covering both their decision-making roles but also, for example, as users of IT in relation to cyber security exercises. Log participation.

- R3** Update the Jersey Emergency Risk Register (JERR) to ensure it is:
- relevant to Jersey's capability and capacity to respond locally
  - complete, by carrying out an exercise requiring all JERR risk owners to confirm completeness of all entries in the JERR by the end of 2025; and
  - informed by and continuous with the management of 'chronic' risks, including through an understanding and ownership by the Executive Leadership Team of links to departmental Business Continuity Plans and Emergency Preparedness Plans.
- R4** Agree a timeline and publication process for developing a public facing Jersey Emergency Risk Register, so that all Islanders are informed about emergency risk preparedness and management and also understand how they can act to improve individual and community resilience.
- R5** Make a clear decision about progressing work to draft a Resilience Law, including a timetable and action plan. As part of this, take steps, through for example a proper stakeholder consultation exercise, to understand what might make the Resilience Standards a better fit for Jersey.
- R6** In line with the introduction of a new Resilience Law and further development of Resilience Standards, ensure there is a mechanism to integrate the Resilience Standards into contracts with owners and operators of critical infrastructure, including for transport links.

### **Work planned that should be prioritised**

- P1** Ensure that all Jersey Resilience Forum meetings and associated Working Group meetings are fully documented with a sufficient record to provide an audit trail of attendance, participation, information considered, challenge and discussion, decisions made, action points arising and action follow through.

### **Areas for consideration**

- A1** Design and implement a formal feedback mechanism for the Jersey Resilience Forum Executive Group to brief the Government's Executive Leadership Team.
- A2** Introduce an annual process for risk owners to confirm ongoing relevance of all risks in the Jersey Emergency Risk Register.

# Resilience of transport links

83. I have considered the Government's arrangements to manage resilience of Jersey's transport links in terms of:

- the role of the Ports of Jersey
- sea connectivity
- air links
- air ambulance service
- bus connectivity; and
- highways infrastructure.

## The role of the Ports of Jersey

84. Ports of Jersey is the sole provider of airport and harbour operations. It is wholly owned by the Government of Jersey. The Minister for Treasury and Resources' relationship with Ports of Jersey is managed through a Memorandum of Understanding (MoU), the latest version of which was signed by the Minister on 1 May 2022. An exercise to review and update the MoUs for States-owned entities is planned to be completed in late summer 2025.

85. The MoU describes the governance framework, including the requirements for reporting and regarding accountability to the States as shareholder. Key to accountability is the Strategic Business Plan (SBP) prepared by Ports of Jersey under Schedule 2 of the MoU. The SBP is submitted following engagement with relevant Government Policy Leads and must include:

- the current business environment and key challenges
- key business objectives for the period of the SBP
- nature and scope of activities
- review of key risks
- forecast of issues requiring Shareholder consultation
- KPIs; and

- the Operational Budget for at least two years.
86. From my review of the SBP for 2024 to 2028, I conclude that all of these issues are addressed in a thorough and accessible manner, including demonstrable alignment to the Policy Framework for the Port Sector and the Visitor Economy Strategy.
87. Ports of Jersey is accountable to the Shareholder through quarterly meetings. In my audit of *Strategic Property Management* (May 2025), I concluded that the quarterly minutes *'provide an effective summary of the ongoing dialogue on business performance, financial position, governance issues and risk'*.

### **Policy Framework for the Ports Sector**

88. The Policy Framework for the Ports Sector (R.4/2024) outlines the Government's policy direction and priorities for the sector. It describes the aim for *'a safe, secure and sustainable Ports Sector that is efficient, accessible and resilient, to support the development of Jersey's economy, in order to deliver greater prosperity, security and opportunities for Islanders'*.
89. The Policy Framework was instigated by the Ports Policy Ministerial Group (PPMG). The PPMG was established in 2016 by way of a MoU between the Minister for Treasury and Resources and Ports of Jersey. The aim is to provide advice to the Minister for Treasury and Resources and the (now named) Minister for Sustainable Economic Development to discharge their obligations in respect of the relationship with Ports of Jersey. Supported by officers, the PPMG comprises:
- the Minister for Sustainable Economic Development (Chair)
  - Chief Minister
  - Minister for Treasury and Resources; and
  - Minister for Infrastructure.
90. The PPMG was re-constituted in 2022 by Ministerial Decision (MD-CM-2022-713) following a period where it did not meet during the previous Council of Ministers. The Group was re-established with a revised Terms of Reference by Ministerial Decision by the new Chief Minister on 10 May 2024 (MD-CM-2024-261).
91. The PPMG provides an opportunity for wider debate than the specific remit of the quarterly shareholder meetings, with a focus that includes Ministers arriving at a shared view on resilience and long-term supply issues. Its purpose is described in the Terms of Reference as to:

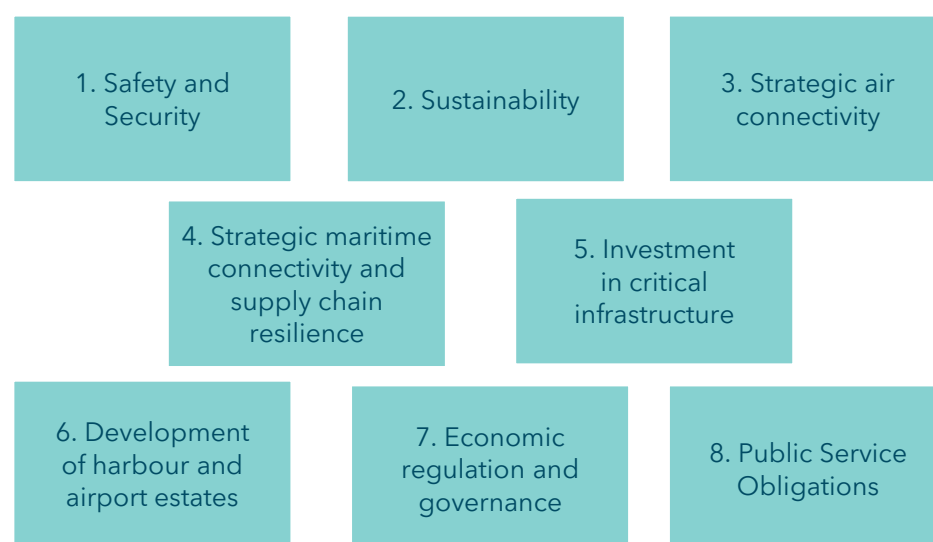
- provide direction, guidance, support, and alignment to enable the effective and efficient implementation of key strategic priorities
- receive regular updates from officers and Ports of Jersey to inform policy guidance, which will include statistics, analysis, and advice; and
- discuss other matters as deemed required by the membership or by the MoU.

92. The Policy Framework for the Ports Sector sets out the following four goals:

- further enhance Jersey's connectivity by ensuring safe, secure and competitive services, responsive to the needs of business, tourism and consumers
- ensure the resilience of Jersey's lifeline air and sea links, by investing in critical gateway infrastructure
- maximise the contribution of the Ports Sector to Jersey's economic development and development in accordance with the Future Economy Programme; and
- ensure all actions are guided by environmental objectives.

93. The Policy Framework identifies eight strategic priorities, a number of which are relevant to my audit (see Exhibit 12).

### Exhibit 12: Strategic priorities for the Ports Sector



Source: Policy Framework for the Ports Sector (R.4/2024 December 2023)

## Regulation

94. The air and maritime sectors are heavily regulated. With regard to the airport and harbour, Ports of Jersey can evidence that:
- risks and vulnerabilities are understood, tested and owned; and
  - effective actions are taken in response to performance monitoring and asset condition.
95. Ports of Jersey is subject to economic regulation including quality of service, by the Jersey Competition Regulatory Authority (JCRA). JCRA publishes quarterly data on service quality and performance provided by Ports of Jersey. Data for 2024 and to March 2025 is set out in Exhibit 13.

### Exhibit 13: Airport and Harbour Performance Statistics 2024-2025

|                         | 2024  |       |       |       | 2025  |
|-------------------------|-------|-------|-------|-------|-------|
| Air connections         | Q1    | Q2    | Q3    | Q4    | Q1    |
| Flights                 | 3,400 | 4,700 | 5,366 | 3,900 | 3,300 |
| Arrival cancellations   | 2.30% | 2.80% | 2.70% | 6.40% | 2.10% |
| Departure cancellations | 2.40% | 2.70% | 2.70% | 6%    | 2%    |
| Stand availability      | 100%  | 100%  | 100%  | 100%  | 100%  |
| Sea connections         | Q1    | Q2    | Q3    | Q4    | Q1    |
| Planned sailings        | 301   | 477   | 534   | 291   | 264   |
| Cancellations           | 2.99% | 5.40% | 0.90% | 1.40% | 3.41% |
| Berth availability      | 69%   | 100%  | 100%  | 100%  | 85%   |

Source: JCRA Quality of Service Reports 2024-2025

96. The airport figures exclude disruption due to weather in Jersey and other jurisdictions as this is outside of control of the airport.
97. The Director of Civil Aviation (DCA) is responsible for licensing and regulation of the aerodrome and air navigation services. The DCA role includes specific audits which are part of an overall framework of audit and regulation covering all aspects of operations. From February to June 2025, the airport was subject to additional regulatory oversight by the DCA. There have been changes in the organisational structure and operational leadership which led to increased scrutiny from the

regulator to gain assurance that the changes do not impact on safety standards and regulatory compliance.

98. External agencies provide support to the oversight and compliance role of the Office of the Director of Civil Aviation at the airport. Compliance is reported to the Harbour and Airports Authorities Committee of Ports of Jersey and the Board and results summarised in the Ports of Jersey Annual Report. The audits reported from 2021 to 2023 are summarised in Exhibit 14.

#### **Exhibit 14: Range of airport audits since 2021**

| <b>Airport audits</b>                  | <b>Agency</b>                                |
|----------------------------------------|----------------------------------------------|
| Aerodrome certification                | UK Civil Aviation Authority (CAA)            |
| Aviation security                      | UK CAA for UK Department for Transport       |
| Air navigation certificate             | European Union Aviation Safety Agency (EASA) |
| ATCO training organisation certificate | EASA/CAA                                     |
| Aeronautical meteorological service    | UK Met Office                                |
| Aerodrome habitat management           | BSM                                          |
| Bird control management                | Birdstrike Management Limited                |
| Quality Management Systems ISO9001     | TUV Nord                                     |

*Source: Ports of Jersey Annual Reports 2021 to 2023*

99. There are fewer requirements for maritime audits. The Ports of Jersey supplements mandatory reviews with discretionary audits and peer reviews. The range of audits reported since 2021 is shown in Exhibit 15.

## Exhibit 15: Range of maritime audits since 2021

| Marine audits                                    | Agency                         |
|--------------------------------------------------|--------------------------------|
| Implementation of International Instruments Code | Maritime and Coastguard Agency |
| Port facility security assessment                | Department for Transport       |
| Port Marine Safety Code                          | Marico Marine                  |
| Trinity House Inspection                         | Trinity House                  |
| MCA Peer Review                                  | Maritime and Coastguard Agency |
| 5 Gold Anchor                                    | Yacht Harbour Association      |
| Vessel Traffic Service                           | Port of London                 |

Source: *Ports of Jersey Annual Reports 2021 to 2023*

100. The latest annual report confirmed that all compliance audits were completed without any significant non-conformities being recorded.

### Business as usual arrangements

101. Ports of Jersey also relies on internal resources to provide assurance in respect of cyber-security, data protection, risk management and business continuity. During March 2025 an overnight threat to the airport was not immediately noted due to the email system not being monitored when the airport is closed. The threat was ultimately deemed to be 'non-credible' but resulted in airport closure. I have been informed that a new process has been implemented to monitor emails following this incident.
102. A number of routine activities and other initiatives are in place within Ports of Jersey which contribute to resilience:
- a new Communications and Navigation Strategy is being finalised to ensure resilience of primary and secondary radar systems
  - back-up radar is available through established agreements with both Guernsey and Avranches to maintain mutual resilience
  - Digital Remote Air Traffic Control is in place in case of loss of visual capability in the tower. This is required if the airport is to remain operational following an incident in the tower. I am advised that the system requires a software upgrade to keep it fit for purpose

- detailed independent condition surveys of the runway are undertaken. The most recent in 2025 confirmed that the runway is structurally sound beneath the surface. However due to some wear, the full resurfacing of the runway and taxi ways may be brought forward from 2030 to 2027
- friction testing is undertaken every five months, with runways and taxiways being swept each week
- daily inspections of the runway are carried out by the airport Fire Service
- an annual routine maintenance programme is in place for patch repairs and joint filling
- the main electricity supply is supplemented by two substations and back-up generators; and
- a specific exercise was carried out to establish if lessons could be learned following recent experience at Heathrow airport following an electricity sub-station fire. Recommendations arising are being implemented to improve resilience.

103. At the harbour, a similar level of rigour is applied to ensure resilience of the harbour infrastructure and facilities:

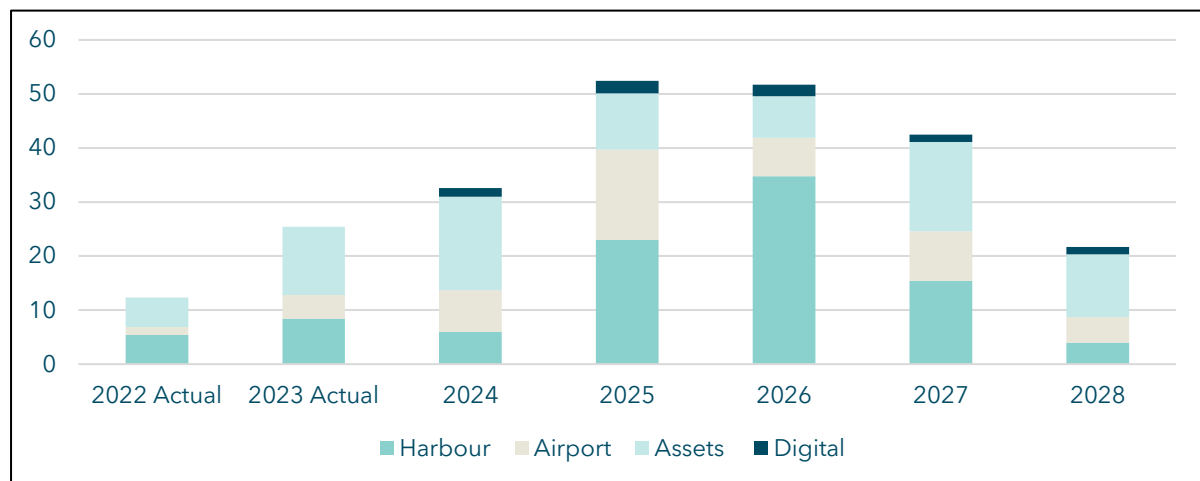
- the Harbour Operations room includes a high level of technology to ensure resilience as the Island has no local back-up port
- an independent back-up system is in place in another area of the Harbour. If both systems fail, Harbour Officers can bring vessels in by radio
- regular inspections are carried out of harbour infrastructure including use of divers to inspect sea gates and wall
- the sea bed is reviewed using technology but as it is a granite bed, it does not require dredging
- there are two linkspan ramps to provide resilience. If one is out of action, tugs are used to manage the risk of damage to the ramp in use
- three independent pilots are available for acts of pilotage unless the ship is exempt or has its own pilot. Due to the change of ferry provider and need for berthing trials, a total of 240 acts of pilotage had been recorded by the end of April 2025 compared to 220 for the whole of 2024
- fuel is offloaded at a separate berth; and

- a single crane is available for Lo-Lo operations. Mobile cranes are available on Island in the event of failure of the harbour crane.

### Capital investment plans

104. The Airport Master Plan and Harbour Master Plan both include elements to enhance resilience as well as improving passenger experiences as these are delivered over the next few years.
105. The Airport Master Plan includes work to resurface the runway which was originally scheduled for 2030. This work may now be brought forward to 2027 to respond to the recent condition survey. The runway is currently around 1,700m in length which means that larger jets used by British Airways and Jet2 are only able to land with a full payload due to a Grip Test concession (to do with skid resistance) that is in place. The Master Plan includes the opportunity to extend the runway by an additional 200m which will improve resilience as it will mean that this concession is no longer required.
106. As well as these works, the Airport Master Plan considers options for relocating the electricity sub-station which is currently in the car park area.
107. Investment in the two Master Plans is expected to peak in 2025 and 2026. Exhibit 16 demonstrates the level of the investment since 2022.

### Exhibit 16: Ports of Jersey Capital Investment since 2022



Source: Data from Ports of Jersey Annual Reports and Strategic Business Plan

108. The investment of £52 million planned for 2025 compares to a level of £7 million in 2019.

## Sea connectivity

109. The Government has a low risk appetite for disruption to sea transport due to the requirements for food, fuel and pharmaceuticals, 98% of which come to Jersey by sea.
110. The Policy Framework includes that *'We will ensure Jersey's lifeline ferry services are resilient, reliable, customer focussed and deliver growth in passenger volumes. We will develop the conditions to drive competition and efficiency across the maritime supply chain'*.
111. The Policy Framework identifies three critical components which are important to the resilience and efficiency of the maritime supply chain. These were highlighted during the COVID-19 pandemic and are shown in Exhibit 17.

### Exhibit 17: Critical components of maritime connectivity



Source: JAO analysis of data from Policy Framework for the Ports Sector

112. The Ports of Jersey SBP 2024-2028 includes the following priorities for maritime connectivity which reflect the themes in the Policy Framework for the Ports Sector:
- confirm arrangements for the future provision of ferry services at the end of the current Operating Agreement
  - support investment in new ferry vessels to enable more resilient and reliable ferry services
  - drive more integrated strategic marketing with Visit Jersey and the ferry operator, with more dynamic pricing
  - continue to implement the findings of the JCRA Freight Logistics market study (July 2022)
  - explore opportunities with Government to remove barriers to competition in the freight sector, positively impacting the retail sector and cost of moving goods; and
  - provision of additional facilities / infrastructure to ensure supply chain resilience.

## Ferry services

113. Ferry services to the Island are a core part of critical transport infrastructure. Over recent years there have been challenges to the resilience of ferry services due in part to the financial situation of the main ferry operator.
114. In June 2023, officers from Jersey and Guernsey began joint resilience planning, including workshops to develop ways forward. On 15 December 2023, it was concluded that contingency arrangements needed to be established in case of the operator's financial situation worsening. The contract identified a ferry to be on 'stand-by' to maintain lifeline services if required, providing for fully operational passenger and freight services within two days of a request.
115. The contract was jointly funded by both Islands from December 2023 to October 2024, at which point Guernsey appointed Brittany Ferries as its ferry service provider. Jersey continued to fund the contingency arrangement until the end of March 2025. On 13 March 2025 the Minister for Sustainable Economic Development, in response to a question from the Economic and International Affairs Scrutiny Panel in a public hearing focussing on ferry services, noted that to that date the cost to Jersey was approximately £5 million.
116. In September 2023, the States of Jersey began developing a ferry procurement strategy for Jersey-only services, as it was not clear at that time whether the States of Guernsey intended to undertake a full tendering process. In October 2023 both Governments agreed to enter joint market testing which began in January 2024.
117. Early expressions of interest gave officers from both Islands confidence to proceed to a full tender process. This was underway by April 2024.
118. A permit is conferred by the Harbour Master for Ro-Ro freight, car and passenger services operating between Jersey, France and the UK. The June 2024 Sea Transport Policy set out the two ways in which the Harbour Master can confer permits:
- an exclusive permit to a single Ro-Ro ferry operator; or
  - permits to all who apply, where the applicant can operate to the same standard and provision of a principal operator.
119. The June 2024 policy also newly authorised a maximum 15-year duration for a permit, followed by a five-year extension period / wind down period as required. The States of Jersey intended that these changes would help ensure the long-term security of supply of lifeline ferry services.
120. The joint tender process which started in April 2024 identified three viable bidders, from which two were shortlisted. These were Brittany Ferries (trading

name of BAI (Bretagne Angleterre Irlande S.A)) and DFDS. In October 2024 Guernsey nominated BAI as their preferred bidder. However, the States of Jersey reported that they had not concluded their evaluation.

121. The failure of the joint tender exercise led to a Jersey-only process involving a 'Request for Proposals' from BAI and DFDS by 20 November 2024. The decision to consider only the two bidders from the final stage of the joint process was driven by the impending end date of the existing contract (27 March 2025) and the need to allow the successful bidder enough time to stand up a service. This decision was taken despite expert procurement advice at the time that the Government should go out to the market again.
122. The joint tender process had been modelled around a 15-year agreement. I understand that as part of the Jersey-only process the two bidders, separately and according to their own calculations, presented proposals for longer term contracts. Both BAI and DFDS reasoned that the investment they would need to make in their fleets would, in what would be a smaller market than the joint tender had offered, require a longer term concession agreement in order to be viable.
123. In response, the Government asked both tenderers to clarify the implications of a move from a 15-year period to a 17-year and a 20-year period as part of the clarification process. I have seen no evidence that the benefits and risks of each extended period were evaluated and documented.
124. The Jersey-only tender process did not include the requirement for an inter-Island ferry. The joint Channel Islands tender had specified inter-Island rotations, and Guernsey's appointment of Brittany Ferries mandated provision for an inter-Island service once each week. The States of Jersey concluded that, for the single Island tender, a requirement to deliver inter-Island services that may not be commercially viable would be unreasonable.
125. There is though no documented impact assessment against risk appetite to underpin this decision. Instead, the significant reduction in inter-Island provision was accepted in the short term without the 'value added' being fully evaluated. For example, the impact on the tourist experience and for visitors wishing to visit multiple Channel Islands was not explored and the conclusions factored in as part of the decision to exclude inter-Island requirements.
126. When the concession was awarded by the States of Jersey in January 2025, DFDS was asked to look at reciprocating any inter-Island services offered by Brittany Ferries and adding further sailings if commercially viable. This though is not part of any contractual agreement. Towards the end of my fieldwork for this audit, inter-Island ferries had been established or announced from three different providers, including DFDS.

127. In May 2025, the Sea Transport Policy was updated for a third time in a year (R.78/2025). This added further requirements for permits to be granted by the Harbour Master for inter-Island routes.
128. While the new Operator Agreement is still in the early stages following the procurement exercise, the concerns that led to a contingency plan to manage the risk associated with the previous agreement are no longer evident. Officers interviewed during my audit from the Government and Ports of Jersey consider that resilience of sea links has improved. Furthermore, the new agreement includes improvements to contract management arrangements following learning from the earlier agreement.
129. There are though areas where the impact of operational changes introduced by DFDS have yet to fully play out. An example is the move, in line with the terms of the tender, to charge a flat rate for freight services, calculated by 'lane meter'. In a briefing to media announcing the pricing model, the Government's Chief Economist suggested that, in response to the flat fee, supermarket inflation could rise by up to 0.44%, which was described as 'not a significant amount'. However, since its introduction, Government officers have noted more significant increases in the costs of bringing in goods, and there are examples of businesses reporting an increasingly challenging economic environment due to, among other things, higher shipping costs. It is important that the Government monitors the impact and risk associated with these and any other changes.

### **Port infrastructure and operations**

130. Jersey's supply chain operates largely as 'Just in Time' due to constraints on warehousing facilities on the Island. The Policy Framework for the Ports Sector also notes that at peak times, Ro-Ro freight operations exceed current harbour capacity. The Bridging Island Plan notes that *'significant capital investment is required in order to renew or upgrade port-related infrastructure to support the resilience of the Island's lifeline services and supply chain'*.
131. The 'Just in Time' approach means that retailers do not hold significant stocks and therefore disruption and delays can impact on resilience of supply quite quickly.
132. Long term investment is now planned in the harbour in order to build resilience, capacity, flexibility and efficiency and to improve passenger and customer experiences. Ports of Jersey is responsible for this through delivery of the Harbour Master Plan. The Government's policy position is to support this development.

### **Freight logistics**

133. Freight logistics operations in Jersey are constrained by restrictions on roads. Loads arrive on unaccompanied trailers, shipped on Ro-Ro ferries, and are broken

down to enable distribution by smaller trucks and vans. This process takes up already limited warehousing space on the Port estate. It also impacts on resilience and highlights the need for investment in infrastructure as described in the Master Plan.

134. JCRA carried out a Freight Logistics Market Study in 2022 which identified seven recommendations for Government and Ports of Jersey, one of which was to support development of existing and new freight routes to France. At present, the supply chain is dominated by the Northern route. The Government has committed to explore development of a Southern supply route, to diversify the supply offer and enhance resilience. However at this stage there is no strategy for delivery of the policy objective to develop a Southern supply route in liaison with Ports of Jersey.

### **Work planned that should be prioritised**

- P2** Prepare a plan for the consideration of options to develop a Southern supply route in liaison with Ports of Jersey.

## Air links

135. The Government has a greater risk appetite in relation to air links than it does for sea (lifeline) connectivity. The resilience of air links benefits from:
- the volume and diversity of air routes
  - systems and processes in place to ensure resilient infrastructure; and
  - investment plans to develop resilience in the longer-term.
136. The 'Open Skies' policy adopted by Jersey has resulted in good air connections with routes to a variety of destinations in the UK and Europe. Resilience is based on a diverse offer of scheduled hub connections, regional connections and tourist routes with a range of charter routes also available. The Government supports Ports of Jersey in enhancing the route network through trialling destinations in accordance with the Policy Framework.
137. The Policy Framework states that the Government '*will nurture our existing route network and create the conditions to develop sustainable development in high value connectivity (in particular into Europe) and in aviation services*'.
138. In order to ensure resilience and to sustainably grow strategic air connectivity, the aspirations are set out in the Policy Framework. These resonate with the strategic priorities in Ports of Jersey SBP 2024-2028, as set out in Exhibit 18.

### Exhibit 18: Alignment of air connectivity objectives, Government and Ports of Jersey

| Policy Framework for the Ports Sector                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Ports of Jersey SBP 2024-2028                                                                                                                                                                                                                                                                                                                                                                                     |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Key focusses for strategic air connectivity                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Strategic air connectivity priorities                                                                                                                                                                                                                                                                                                                                                                             |
| <p>To position Jersey airport as a Regional Hub within Channel Islands and Northern France</p> <p>Commercialising Jersey's stronger air connectivity to benefit local and nearby passenger segments outside of Jersey</p> <p>To build year-round connectivity to UK and Ireland, reducing seasonality of visitors</p> <p>To develop a sustainable network of European destinations with a focus on:</p> <ul style="list-style-type: none"> <li>• growing scheduled services to key European cities</li> <li>• building routes into Northern France, strengthening our cultural and economic</li> </ul> | <p>Growth of Jersey Airport as a Regional hub</p> <p>Increasing year-round capacity to UK and Irish routes</p> <p>Building a sustainable European network</p> <p>Enabling closer cultural links with Northern France</p> <p>Securing connectivity to a second major European hub</p> <p>Ensuring sustainable links through airline partnerships</p> <p>Growth in awareness of Jersey as a visitor destination</p> |

| Policy Framework for the Ports Sector                                                                                                                                               | Ports of Jersey SBP 2024-2028 |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------|
| ties, and offering easy access to UK for people living in N France; and <ul style="list-style-type: none"> <li>securing hub connectivity to a major European hub airport</li> </ul> |                               |

Source: *Policy Framework for the Ports Sector and Ports of Jersey Strategic Business Plan 2024-2028*

139. In order to deliver the Government objectives for air connectivity, the Policy Framework acknowledges four key dependencies:
- ability of Ports of Jersey to operate commercially, building partnerships with new and existing carriers
  - Visit Jersey's ability to market the Island, building awareness of Jersey as a visitor destination
  - investment in visitor accommodation to provide additional capacity; and
  - development of visitor economy to provide a compelling year round offer.

### **Building partnerships with new and existing carriers**

#### ***Enhancing resilience through development of new routes***

140. During 2023, an arrangement was agreed with EasyJet for a service to and from Amsterdam, which resulted in 5,500 passengers arriving in Jersey. However, a decision was taken to stop the service after six months, as it was considered to be falling short of expectations. In general, a new air route is given two to three years to see if it becomes established, so cessation after six months is unusual.
141. I have seen no evidence of any formal post-implementation review involving Government, Ports of Jersey and Visit Jersey, to identify lessons learned from this project.
142. As part of a Government's 'Better Business Support Package', a service has been promoted with Blue Islands to Paris, every Monday and Thursday, with discounted fares offered in June and July 2025. Compared with the Amsterdam route, this has the advantage of a sales and marketing function being set up in Paris, which will be important as the Blue Islands brand is new to Paris.

### **Blue Islands**

143. Alongside connections to London, the connectivity to regional airports, which is provided by Blue Islands (and some other airlines), is regarded as important by the

Government and Ports of Jersey. Blue Islands services are key to the ability of Islanders to attend healthcare appointments in the UK. In addition, Blue Islands maintain an inter-Island air bridge with Guernsey. Blue Islands has a small fleet (five aircraft) and this presents an inherent risk to resilience. This is monitored by Ports of Jersey and the Government.

144. In 2020 the Government provided Blue Islands with a loan facility of up to £10 million to support resilient air connectivity. The loan was agreed to be drawn down on request from Blue Islands, with repayment originally due by 30 June 2026. In June 2024, the repayment schedule was restructured and extended to December 2028.
145. The loan was supported by a thorough business case, at a time of uncertainty for the Government, Blue Islands and the aviation sector. The business case quantified the potential financial risk to the Island economy in the event that the carrier could not meet its financial obligations, in contrast to the positive economic benefit that a loan facility of up to £10 million could bring, over a ten year period used in the modelling. External advice was taken to provide due diligence assessments on commercial, financial, operational and legal aspects.
146. The business case identified a range of KPIs, as set out in Exhibit 19.

#### Exhibit 19: Key Performance Indicators linked to objectives of loan to Blue Islands

| Key objectives                                                     | KPIs                                                                                                                  |
|--------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------|
| Increase number of visitors to Jersey                              | Number of air passengers (Blue Islands)                                                                               |
| Restore, and strengthen, regional connectivity to the UK           | Number of critical routes served by Blue Islands<br>Resilience of those routes                                        |
| Long term increase in economic value of leisure and tourism sector | Spend per head of Blue Islands' air passengers (tourism and leisure visitors) and associated Gross Value Added impact |
| Secure a long-term base carrier deal                               | Signed base carrier deal<br>Blue Islands job creation in Jersey<br>Payment of associated fees/charges                 |
| Financially stable Blue Islands                                    | Repayment of Government loan and interest<br>Resilient and stable route network                                       |

Source: Treasury and Exchequer Department Business Case for loan to Blue Islands (June 2020)

147. Since agreement of the loan, performance of Blue Islands has been monitored through attendance as observers at Blue Islands Board meetings by

representatives from Treasury and Exchequer, and Ports of Jersey who acted as Technical Advisor to the States of Jersey at the time of the loan.

148. However, there is no evidence within Government to demonstrate that information about the KPIs has been systematically collated, evaluated and reported on during the period of the loan. This lack of monitoring is particularly concerning as I am aware that, in late May 2025, Ministers raised concerns about Blue Islands, including in relation to resilience of flights for patients needing UK and Guernsey services.
149. One outcome from the loan arrangement was the agreement of a ten year 'base carrier' deal with Ports of Jersey. Blue Islands is now based at the airport in Jersey with a close working relationship with Ports of Jersey. The loan agreement and the 'base carrier' deal with Blue Islands was agreed in order to provide certainty and some longer-term resilience for routes to Southampton, Bristol, Birmingham and Exeter. However, the comparatively small size of the Blue Islands fleet and the operational challenges associated with this, present risks which were evident at the time of my review. Options for new routes are considered jointly with Ports of Jersey and Blue Islands. The close working relationship provides the opportunity for Ports of Jersey to intervene and offer support to help manage the risk of unprofitable routes.
150. The Government response to a Freedom of Information request in October 2024 set out that £8.5 million of the £10 million loan available had been drawn down and around £7 million was at that time outstanding. The outstanding capital balance at June 2025 remained at £7 million.
151. In May 2025, Blue Islands announced that due to delays in delivery of a new aircraft and damage to another aircraft, it would have to cancel 28 flights from the Summer 2025 schedule. This would affect four of the carrier's 18 routes. In the context of these challenges and the small fleet available to Blue Islands, there is a danger that in promoting the new Paris route, existing routes are compromised.
152. A working group was set up in June 2025 including representatives from Government and Ports of Jersey to ensure the sustainability of Jersey's regional connectivity.

### **The link between the Visitor Economy Strategy and resilient air links**

153. The Jersey Visitor Economy Strategy 'Changing perceptions, shaping the future' (December 2023) was developed by the Government in partnership with industry and other stakeholders, including Visit Jersey. The Strategy has eight priorities including connectivity and unlocking investment in accommodation, which resonate with the priorities in the Policy Framework for the Ports Sector and the objectives in the Ports of Jersey SBP. The detail in the strategy supporting the

priority of connectivity aligns closely with the Policy Framework. The Strategy also recognises the importance of effective working relationships. In practice, there are established relationships at political and officer level between Government, Ports of Jersey and Visit Jersey.

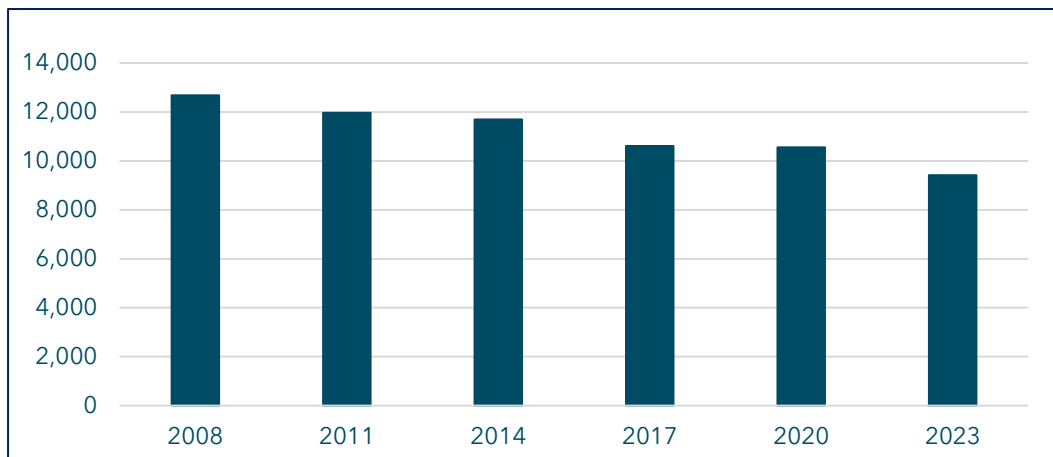
154. The Visit Jersey Business Plan focusses on the Jersey 'brand' and 'offer' to support the Government in delivering the objectives in the Visitor Economy Strategy. Ports of Jersey and Visit Jersey collaborate on air route development which is a priority for all parties. Connection to a second major European hub, alongside London, is a specific objective to improve coverage and enhance resilience. Ports of Jersey initiates route development prior to engagement with other stakeholders.

### Visitor accommodation

155. The aspiration to enhance resilience through development of new and existing air routes is constrained by the availability of beds for tourists. This is acknowledged by Ports of Jersey, Visit Jersey and the Government in key strategic and policy documents.

156. Exhibit 20 shows how, since 2008 to 2023, tourist bed numbers have fallen.

### Exhibit 20: Tourist bed numbers from three-yearly reviews from 2008 to 2023



Source: Ports of Jersey Strategic Business Plan 2024-2028

157. Since 2008 and to 2023, tourist bed numbers have fallen from 12,700 to 9,400, not including accommodation such as Airbnb<sup>1</sup>. Growth of Airbnb and other online providers will have consequences for the housing supply market so reliable data would be advantageous to the Government.

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<sup>1</sup> Where these are below the prescribed person limit of five they are exempt from registration under Section 19 of the Tourism (General Provisions) (Jersey) Order, 1990

158. The Delivery Plan for the Visitor Economy Strategy published in June 2024 sets out a series of actions to help address the policy priority to 'Unlock investment in Accommodation'. These actions remain in progress and include development of small scale visitor accommodation in St Helier Harbour and exploring the potential for further developments on the Ports of Jersey estate at La Folie.

### **The impact of commercial air links on patient transport**

159. Health and Care Jersey (HCJ) manages the transfer and transport of patients who need to travel to the UK or Guernsey for healthcare services.
160. Referrals for more routine healthcare services not provided in Jersey are made to hospitals in the UK and, to a much lesser extent, Guernsey, depending on the speciality required. Appointments can be for outpatient, day case or inpatient healthcare services, for mental and for physical health needs.
161. Where individuals are able to use commercial transport, HCJ's Patient Access Team arranges and pays for (typically) flights and overland travel. Where needed, accommodation is also booked. Depending on eligibility, HCJ might also arrange and pay for travel and accommodation for a patient escort.
162. On average, in the region of 15 patients travel each day. A high proportion (68%) of non-emergency patient travel is with Blue Islands. The majority of that travel is to Southampton, for access to Southampton hospitals (including University Hospital Southampton, Princess Anne Maternity Hospital, Southampton Nuffield Wessex and Southampton General Hospital) and, with onward travel, to hospitals in Bournemouth. The attendance of Jersey (and Guernsey) patients at Southampton hospitals is so routine that a Channel Islands liaison team has been established.
163. Those travelling for healthcare reasons experience the same likelihood that issues will arise with transport links as all other passengers, but the impact on their wellbeing can be significantly greater. Depending on the nature of the issue, action by the Patient Access Team at HCJ can include:
- where there is some availability, forcing patients onto the manifest as high priority
  - where specific services are cancelled, routing patients to other airports with overland travel as required
  - where issues are known about in advance, patients might be able to travel by ferry; and
  - where appointments can be delayed without significant impact, rescheduling travel arrangements.

164. There are though times when patients miss important diagnostics, treatments and procedures.
165. Ensuring patients can get to their appointments is getting riskier due to the issues with Blue Islands I have described. As part of my audit I requested sight of monitoring reports from the Patient Access Team, to understand across all routes, the scale of disruption to patient transport, the key reasons and trends, and to gain insight into the impact and mitigation of disruption. However, such reports are not available. I was offered a download from the Patient Access Team's booking and management system (all data to be anonymised) to show numbers of patient delays in the last two years. However, it transpired that this could not be provided without each patient entry being reviewed to understand if their journey was subject to delay. I did not ask for this exercise to be undertaken.
166. I note that a recent Freedom of Information Request asked for details of the number of appointments and procedures missed due to delayed, cancelled or rescheduled Blue Islands flights, and the cost to the taxpayer of missed NHS appointments. On 20 June 2025 the Government published its response, setting out that HCJ patient travel and UK treatment records are not held in a format that enables the requested information to be reported. The response also noted that cancelled flights would be refunded or rescheduled to an appropriate alternative flight, but that accommodation costs might be incurred, for additional nights' accommodation when return flights are cancelled, or pre-booked accommodation unused with outbound cancellations. This though does not respond directly to the request for information on the cost of the missed appointment in terms of charges from the NHS.
167. It is clear that the Government does not routinely monitor performance or have a sound basis for understanding and managing the risks to patient outcomes when overseas health appointments are missed. It is important that the Government has a mechanism to ensure adequate reporting on patients' experiences, including the impact of missed appointments on health and wellbeing, to inform decisions.

## Recommendations

- R7** Develop a formal process for post-implementation review of new air route trials involving Government, Ports of Jersey and Visit Jersey. To commence with a detailed review of the impact of the new Paris route served by Blue Islands.
- R8** Introduce a structured process for reporting the identified Key Performance Indicators in respect of the Blue Islands loan so that achievement of the desired outcome can be evidenced or corrective action taken.

- R9** For patients whose travel to overseas appointments is organised by Health and Care Jersey, capture, analyse and report data about delayed and missed appointments. This should include the consequences in terms of patient health and wellbeing and cost and be used to assess risk and potential mitigations.

**Area for consideration**

- A3** Consider options for collection of accurate data on numbers of properties offering visitor beds on online platforms such as Airbnb.

## Air Ambulance Service

168. In certain circumstances patients require transportation by a specially equipped aircraft and to be accompanied by medical personnel (an air ambulance service). These are typically emergency transfers but can be non-emergency. HCJ's Jersey Emergency Transfer Service (JETS) office manages this.

### Contractual arrangements

169. In May 2018, a new contract was taken out with an air ambulance service to provide the JETS, following a competitive process. At the same time Guernsey entered into a contract with the same provider. In 2020 this service provider became insolvent and the contracts for both Jersey and Guernsey were novated to a replacement service provider. In order to keep the service flying the aircraft of the insolvent operator were transferred.
170. The air ambulance contract was novated to Gama Aviation in June 2020. The term of this novation was agreed to be to 31 May 2025. Guernsey has an equivalent contract with the same provider covering the same period and in practice the same planes can be used when needed to service both Islands. Key elements of the Jersey contract that seek to ensure resilience include:
- provision of 24 hour/365 day services including aircraft, aircraft healthcare equipment and aircraft crew (HCJ in almost all cases provides the medical personnel)
  - an aircraft to be based within Jersey and ready to depart Jersey Airport, complete with two crew, appropriate medical personnel and the patient, within two hours of the first transfer request of the day (acknowledging the ability to fly is weather dependent); and
  - the contractor is required to plan ahead as far as is practicable for the undertaking of scheduled maintenance, and to provide a replacement aircraft of suitable specification during maintenance periods.
171. The contract however also recognises that, after the first transfer request of the day, the ability to respond to subsequent calls can be affected by availability of aircraft, availability of crew and Flight Time Limitations, as set out in Civil Aviation Authority requirements. In such cases, the contract requires the provider to use 'reasonable endeavours' to provide the number of additional aircraft and pilots necessary.
172. In doing so, aircraft and/or crew can be mobilised from subcontractors as long as these are previously notified to, and approved by, the Government of Jersey. In

practical terms, if available, the Guernsey aircraft can be brought into action for Jersey patients. Similarly, the Jersey based service can support Guernsey.

173. There are limited penalties built into the contract for missing Key Performance Indicators relating to aircraft and crew availability, but none that relate to equipment provision.
174. The 2020 contract allowed for an extension for a further period or periods of up to five years total, stating that the minimum allowable extension period is two years. In advance of this, the contract sets out that Government of Jersey must agree the charges to be payable to the contractor for the provision of any services during the extension, at least six months prior to the end of the initial term.
175. In November 2024 HCJ and Gama Aviation agreed a variation of the 2020 contract, to enable a single year extension, to run from June 2025 to May 2026. The original contract had specified a minimum extension period of two years. Planning and discussions had commenced in March 2024 between all parties, including the supplier and the States of Guernsey, regarding the viability, risks and financial cost of extending services. Officers have explained that a two year extension was not awarded due to concerns about the age of the provider's aircraft and the consequent risk to performance, resilience and value for money of a two year extension. The one year extension term did not limit the parties from applying the remaining extension period. I am however unclear as to why a full tender exercise was not planned well in advance of November 2024, given the concerns that existed, in order to consider all options.
176. In extending for a single year, HCJ documented its acknowledgement that, as the contract term is short, there would be no investment in alternative aircraft. The variation agreement to extend the contract for a single year included that '*the Contractor requires some alleviation to the availability KPI*' (which monitors aircraft availability against targets and tolerances). An agreement was reached to include in the one year contract variation that availability breaches would be considered on a case by case basis. Despite deciding a single year extension was a lower risk option, HCJ acknowledged the need to accept the increased likelihood of '*elongated downtime, which will continue to impact on aircraft availability*'.
177. In June 2025, the Government of Jersey approved a strategy to procure, on behalf of HCJ, an air ambulance service for a five year period from June 2026, with the potential to extend for a period of two to five year. Jersey and Guernsey are undertaking some parts of the procurement process together but will be individually responsible for decisions made.
178. The strategy notes the significant weighting to be placed on service quality when considering bids, and the opportunity to include more outcome based rather than input-focussed criteria in contract specification and future management KPIs. It

describes opportunities to conduct a competitive process and deliver a strategic vision for a clinically responsive, safe and efficient air ambulance service. The strategy sets out that key deliverables will include:

- meeting clinical and operational requirements and future proofing
- maximising opportunities and benefits through collaboration with the States of Guernsey
- allowing capacity in the service to meet expected changes in demand levels and future healthcare trends
- revised and fit for purpose KPIs with appropriate and proportionate consequences within the applied terms and conditions; and
- commissioning newer fleet to:
  - improve patient comfort and dignity; and
  - reduce the need for back-up aircraft and extended maintenance schedules.

179. That JETS is a critical transport link for Jersey is undeniable. The number of transfer requests has been increasing, the acuity of patients being transferred is generally higher, but the air ambulance service provided has in some cases not shown resilience, particularly in the recent past. In this context it is crucial that HCJ properly understands its risk appetite – that is, the level of risk it is willing to hold. It is equally crucial that, once a specification is agreed, oversight and reporting arrangements are adequate to manage the inherent risks in line with HCJ’s risk appetite.

### **Contractual performance**

180. Performance management of the contract is chiefly by way of monthly activity reports and quarterly meetings. The quarterly meetings do not have Terms of Reference but frame the content in line with the specification and requirements of the contract. However, this means that expected attendance, roles and responsibilities, and reporting and escalation procedures are not set out.
181. The quality of the information provided at the quarterly meeting against the limited requirements of the contract is good. This includes data on overall service activity, and on exceptions and incidents, as defined by JETS.
182. **Exceptions** recorded are a relatively high proportion of overall patient transfers. All transfer requests after the first one each day are classified as exceptions. There is no contractual service standard in terms of response time for these transfer

requests and the exceptions data does not differentiate whether the aircraft was ready to depart within two hours of notification, or not. As such, meaningful data is not routinely available to evaluate the frequency and impact of delays in commencing patient transfer.

183. The requirement of the contract extension that the service provider use 'reasonable endeavours' to provide the number of additional properly equipped aircraft and pilots necessary to meet the demand is weaker than if the contract required 'best endeavours'. The JETS Manager keeps a log of how each transfer request proceeds and keeps a good note of circumstances, but this is not currently used in contract management. There is no routine reporting against targets or tolerances of:
- the success of 'reasonable endeavours' – for example securing use of the aircraft designated for Guernsey transfers; or
  - the impact on patient outcomes of delays due to failure to secure additional resources – only where an 'incident' is noted is there routine logging and reporting of the impact on the health and wellbeing of the patient.
184. Contractor reports typically show a 100% achievement against the KPI which monitors the two hour response requirement for the first transfer request of the day. In October and November 2024 the contractor reported that performance against the two hour response KPI for the first transfer of the day had been missed in each month for one patient, due respectively to equipment and mechanical issues. Another KPI (that the aircraft should be capable of carrying an incubator or a stretcher plus up to five clinical practitioners to attend to the patient) was not met at all in December 2024.
185. In my view, data definitions should be re-thought and activity analysed more closely to understand trends, patterns and risk, for discussion at contract and other JETS governance meetings. This would support the evaluation of whether the capacity and quality of the service, as delivered, meet Islanders' needs, and enable a more robust risk assessment of the service against risk appetite.
186. **Incidents**, as reported in HCJ's Datix Incident Reporting System, include accidents and issues with staffing, mechanical or equipment issues which impact on the patient transfers. In my view, each entry contained in the Datix report clearly sets out the issue, how it had arisen, actions taken and lessons learned. I am not clear though, as was the case for exceptions, how the incidents are analysed to identify patterns and trends.
187. As part of my audit I evaluated the 57 incidents logged between November 2022 and March 2025, focussing on the 'code' as used in HCJ's Datix Incident Reporting System to categorise incidents. In undertaking this analysis I identified overlap

between the categories, which increases the risk that priorities for improvement are not clearly evident. For example:

- 'aircraft availability' described both aircraft issues and/or crew issues
- 'delay in transfers' included aircraft availability (sometimes logged as mechanical issues) and weather
- 'delay in flight' was chiefly due to aircraft availability or communications
- 'transfer - other' related to mechanical failure and equipment failure; and
- 'referral problems' were both about communication.

188. More can be done to log and analyse data so that it provides a richer picture of risks and how they might be reduced.

### **Overall performance monitoring**

189. Of concern is that, apart from the contract management meetings, there have been times when there has been no forum in which JETS performance data is routinely considered in detail. I have not found any information shared with the HCJ Advisory Board, despite the risks inherent in contractual arrangements and performance.

190. A JETS Advisory Group (JETSAG) is constituted, comprising a:

- Strategic group – covering policy, funding, and long-term service development; and
- Operational group – focussing on clinical operations, logistics, and day-to-day service delivery.

191. However, officers report historic issues with ensuring meetings are quorate. In 2023 there were three meetings in the first quarter, but then none until February 2025. To June 2025, there had been three Operational group meetings, with, at the time of my fieldwork, the next planned for July 2025. One Strategic group meeting is planned for 2025.

192. Meetings in the first quarter of 2023 discussed the benefits of tendering the contract for JETS, and for enhancing the KPIs and risk sharing arrangements in line with issues with the then current contract. It is not clear though if any action was undertaken or proposals were made. In any case, a single year contract extension was arranged in November 2024 to run from June 2025 to May 2026.

193. **Risks** to do with JETS are logged in HCJ's Datix system. Currently, three risks are recorded, two of which are categorised as 'red' and one as 'amber', that are to do with JETS transport provision. Exhibit 21 summarises these.

**Exhibit 21: Observations on JETS transport risks identified in Datix**

| Description                                                                                                                             | Dates                  | Rating | Observations                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|-----------------------------------------------------------------------------------------------------------------------------------------|------------------------|--------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Risks of harm due to delays in transfer caused by aircraft breakdown<br><br>Scope: a HCJ-wide risk                                      | Added:<br>January 2019 | Amber  | There is no update to reflect how the November 2024 single year contract extension, with no fleet upgrade, affects this risk. JETS incident log shows a high proportion of incidents is, at base, to do with mechanical or maintenance issues.<br><br>I am not clear why this is not considered a red risk.<br><br>There is also a risk of confusion between managing the risk of 'availability' (see below) separately from aircraft resilience. |
| Flight transfers – availability of medics and / or nurses and skills, and impact on areas providing the staff<br><br>Scope: a JETS risk | Added:<br>January 2019 | Red    | Narrative was last updated in April 2023, when the JETSAG meeting proposed that Allied Health Professionals cover some transfers.<br><br>The JETS log of 57 incidents from November 2022 to March 2025 has only two entries to do with nurse or doctor availability,<br><br>I am not clear on the reasons for this remaining a red risk. In any case there is no text update since April 2023.                                                    |
| Availability of aircraft impacting patient transfers off Island or repatriation<br><br>Scope: a HCJ-wide risk                           | Added:<br>January 2019 | Red    | This entry acknowledges that reliance on the use of the Guernsey aircraft has become more common-place. The 'back-up' aircraft (the third intended to be available) is noted as 'in the hangar and often not available'.<br><br>A clearer picture of overall lack of resilience across the two Islands would be valuable in determining options to mitigate this red risk.                                                                        |

Source: Snapshot of HCJ's Datix system, provided June 2025

194. Information about the service provided by the contractor and considered as part of HCJ's contract management meetings shows that from December 2024 to March 2025, no 'back-up' (third) aircraft was available. Though this is a contractual

requirement, to cover periods of scheduled maintenance so that there is continuity of service, there is no penalty if it is not met.

195. In the last week of June 2025, with the provider's back-up aircraft again not available, the Guernsey aircraft failed, meaning both Islands were reliant on one aircraft. That aircraft also failed and for a period from 7pm to 10am (15 hours) there was no service available from the air ambulance provider. In this circumstance, I understand the provider pays £5,000 towards the use of the Maritime and Coastguard helicopter if it is called into service, but there is no other contractual penalty.
196. As part of my audit I requested from the JETS office the Business Continuity Plans (BCPs) for the service provider and for the JETS office itself. Officers informed me that, at the time of my request, neither was available: the JETS office did not hold the BCP for the contractor and is still in the process of developing its own. Since then, I have been informed that the contractor's BCP has been reviewed by HCJ.

## Recommendations

**R10** Urgently review oversight arrangements for the Jersey Emergency Transfer Service's current and proposed future contract, including to make sure processes are in place to:

- fully understand and address the impact of current weaknesses in the service, including by:
  - taking a patient outcome perspective; and
  - actively addressing the risks already logged and those that should be logged
- align Key Performance Indicators to monitor all weaknesses identified, even if these are not yet contractual
- develop routine reporting and escalation arrangements; and
- establish joined up Business Continuity Plans.

**R11** Implement a robust procurement strategy to support a November 2025 decision on the award of the JETS contract, informed by views on how well the current service provision meets the States of Jersey's desired outcomes, and how well risks can be managed within the States' risk appetite for this service.

## Bus connectivity

### Concessionary contract arrangements

197. In late 2022, the I&E Department set out a procurement strategy for the Island's bus services, covering public and school buses. This strategy was signed off by the I&E Accountable Officer in January 2023. The contract with the existing bus operator (CT Plus Jersey, operating as LibertyBus and owned by Tower Transit Ltd) was due to expire on 30 March 2023. It is hard to see how between January 2023 and the end of March 2023, a procurement process could have been managed. In practice, the contract was subject to ongoing negotiations and ultimately extended for a two year period to 30 March 2025.
198. The procurement strategy, having been updated, was put into action in later 2023. Throughout, its implementation has been well documented. A Bus Contract Board was established and notes and papers from the meetings provide a good record of its activities and considerations, including the issuing of invitations to tender and scoring of bids, and in coming to a final preferred bidder. In my view, this demonstrates good practice project management.
199. The Government commissioned a 'shadow' bid to act as a benchmark, which is also a good practice approach. In May 2024 tenders were issued to three shortlisted companies and face-to-face interviews were held in July 2024. Following this, all three shortlisted companies submitted responses by the deadline of 29 July 2024.
200. Late in the process, bidders were required to provide additional information for a 'second-stage' evaluation process. Tenderers were requested to propose a variation cost against a theoretical increase in frequency on a particular bus route. Total costs submitted, including the variation, were then set against the I&E Department's budget to understand what was affordable.
201. Consideration by the Bus Contract Board of the three bids, showing scores and weightings for various elements and combinations, including the second-stage information, is easy to follow. The decision was made to re-award the contract to LibertyBus.
202. It is clear that, in designing the tendering process and criteria, officers took the opportunity to build on their experience of how the contract had operated since being awarded in 2013 and take into account policy changes since.
203. The need to ensure that the operator has a clear commercial incentive was a key principle in designing the contract, in particular by capping the Government's liability for concessionary travel. The uncapped liability had been growing and budgets had been overspent, because:

- when the contract was awarded in 2013, there were 3.6 million passenger journeys, 16% of which were free; but
  - by 2024 there were 5.3 million journeys, 40% of which were free.
204. The new contract has an upper fixed sum, to be uplifted by inflation. This means the operator is encouraged to attract fare paying customers. There is a profit sharing agreement with the Government above an agreed upper threshold.
205. The contract period set out in the tender included a minimum initial contract period with new KPIs to be agreed periodically, to ensure that the contract can remain aligned to Government policy. The award of any contract extensions would be based on achieving these KPIs, although the Bus Contract Board recognised that funding to meet aspirations regarding service level increases would need to be considered against future affordability.
206. The Minister for Infrastructure was briefed during week beginning 16 September 2024 on the Board's conclusion and preferred bidder. However, the Island of Jersey 2025 Bus Contract was not signed by the Minister until 16 January 2025.
207. Immediately following the briefing in September 2024, the Minister requested a meeting with the Tower Transit Senior Management Team, after which the project team *'progressed a number of areas requested by the Minister for inclusion in a future Letter of Intent'*.
208. The Minister signed a Ministerial Decision approving the Preferred Tenderer on 23 October 2024. A Letter of Intent was signed at the same time which set a deadline for contract signing as 6 December 2024. However, this was not achieved.
209. The Letter of Intent required details on the extent of any additional associated costs for provision of:
- an East to West (Northern link) route; and
  - changes to frequency and capacity of east of Island routes.
210. In the Letter of Intent, the Minister stated that the information would be used to identify if the I&E Department might be able to accommodate these costs from within its revenue budget allocation. This though was not settled before the contract was signed, and as such there was no instruction to provide these additional services. The contract was signed based on the agreed tender criteria.
211. It has been a long-standing political ambition of the Minister for Infrastructure to have an East to West bus route. Officers advised the Minister that, in consideration of the proposal to develop an East to West bus route, most bus travel and traffic is into and out of St Helier rather than across the Island. In addition, doubts had

been expressed as to whether the route was economically or commercially viable. However, by way of a Ministerial Decision, a contract variation order has been implemented by the Minister, to pilot an East to West bus service. The cost of the pilot, expected to be about £180,000 for a year, will be funded from the Climate Emergency Fund.

212. Until 2026, the Fund is solely to be used in support of the Carbon Neutral Roadmap. In 2020, Jersey's Sustainable Transport Policy set out that, by 2021, a Bus Service Development Plan would deliver a systematic and whole-system analysis of options, opportunities and challenges of making changes to (among other things) the optimum distribution, design and frequency of bus routes. It stated that the Plan will be *'based on detailed quantitative modelling, and qualitative analysis, of where, when and why people do (and don't) want to travel'*. However, while quantitative modelling has been undertaken and used to inform the 2025 Bus Operator Contract, a Bus Service Development Plan has not been published.
213. To date, I have not seen any evaluation criteria which could be used to demonstrate, or at least to monitor, whether using the Climate Emergency Fund for the piloting of the East to West bus service supports its aims and represents value for money.

### **Contractor performance management**

214. LibertyBus is required to provide performance and management information to the Senior Public Transport Planner in the I&E Department, comprising:
- Monthly Progress Report
  - Quality Management Plan
  - Occupational Health and Safety Plan
  - Sustainability Policy
  - Environmental Management Plan
  - Environmental Management System
  - Vehicle Maintenance Plan
  - Annual Service Development Plan; and
  - Marketing and Communications Plan.
215. I have reviewed the Monthly Progress Report relating to January 2025. It provides a narrative to expand on KPIs. For example, in January 9% of bus journeys across the network were recorded as 'running early', leading to five customer complaints. Training needs have been identified as a result. Data is also presented on

environmental performance, where for January the target was more than achieved (692 grams of CO2 per kilometre against a target of 994 grams).

- 216. In the past, a key resilience issue has been the availability of drivers. At one point the Chief Executive of LibertyBus was driving some bus routes. This has been alleviated to a degree but remains a risk.
- 217. Further work is in plan to assess the impact of transport infrastructure, including the bus network, on Island ambitions. For example the Government has commissioned Visit Jersey to undertake work to map physical visitor journeys from arrival to their departure, in order to identify the 'pain points' and look at the risk. This will include how all passenger transport links meet visitors' needs.
- 218. Ensuring that bus routes continue to meet changing needs is important. For example, it would be logical to expect a service to the new healthcare facilities. The network operating at any one time is 'as specified' in the tender and consequent contract, as amended by any variation order. As set out, a variation order has already been implemented since the April 2025 contract began, as the Minister for Infrastructure required a new route to be trialled. The Ministerial Decision supporting this has not yet been published and I have been unable to assess the impact this has on cost and overall service resilience.

## Recommendations

- R12** In procurement processes where changes to stated criteria or terms of contracts are proposed, and in post-contractual variations, document a comprehensive impact assessment, to include evaluation of value for money, the contribution to the States' strategic and operational priorities, an evaluation of whether the funding sources continue to be used appropriately, and the updated risk profile against risk appetite.
- R13** Ensure that the evaluation of the piloted East to West bus route includes an emphasis on value for money and contribution to the States' key priorities.
- R14** Ensure that the Key Performance Indicators for the bus service fully align with, for example, use of resources from the Climate Emergency Fund.

## Highways infrastructure

219. Jersey's Highways Authority role is fulfilled by the Operations and Transport section of the I&E Department. The Authority makes decisions through political, legislative and administrative processes:
- about needs and priorities to serve the public good and satisfy its duty of care
  - to balance conflicting strategic transport and infrastructure priorities
  - to manage the activities of other agencies on highways and infrastructure for works or events; and
  - to protect the States from civil or criminal actions by exercising policy, regulatory and engineering expertise with auditable management systems that are capable of meeting policy objectives and withstanding public scrutiny.
220. The Operations and Transport Team's responsibilities in managing the Island's highways touch on a long list of cross-cutting and Island-wide ambitions:
- social inclusion / reduce barriers to mobility
  - sustainable and efficient transport systems
  - safe transport
  - health benefits
  - tourism benefits
  - support for the Island's commercial development
  - urban regeneration benefits; and
  - improved quality of life.
221. Delivering on objectives in these areas is hampered by what the Government has acknowledged are significant deficiencies in current legislation relating to roads. These result in *'both operational challenges to the department [and] deficiencies in the range of powers that would normally be available to a Transport Authority'*.
222. In March 2021 the Minister for Infrastructure agreed by Ministerial Decision (MD-T-2021-0024) that a review should take place to:
- 'enable the development of appropriate, fit for purpose road transport legislation which will be more effective, improve safety and provide a framework within which*

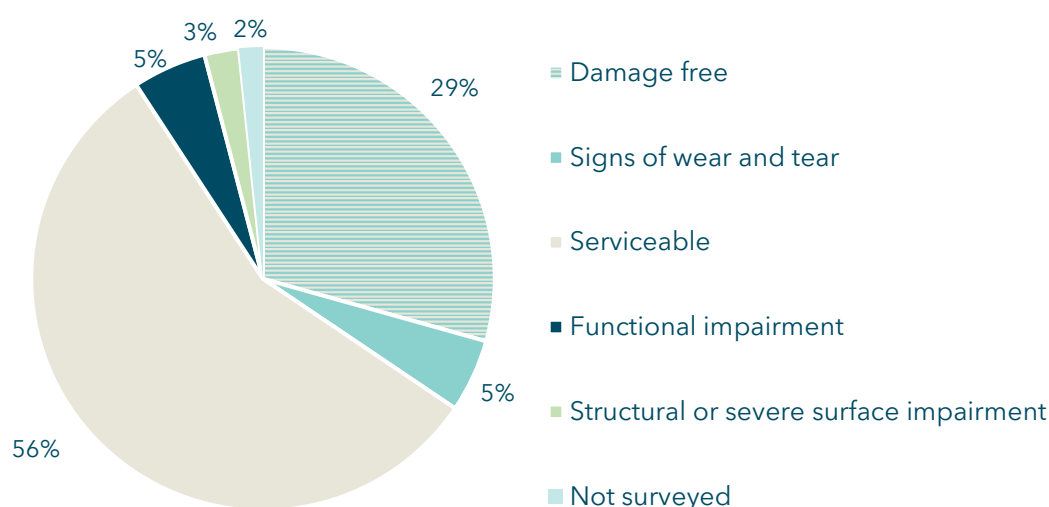
*central features of the Government Plan, such as the Sustainable Transport Policy and the Carbon Neutral Strategy, can be delivered’.*

223. Areas in need of resolution included:
- the six different legal regimes covering management of public roads
  - inadequate Highways Authority powers
  - unclear Parish Roads Committees’ status, powers and legal liability; and
  - whether to introduce civil liability for non-repair of public roads.
224. The review is on-going, driven by a Road Law Project Board. Notes from the March 2025 meeting describe progress in work with the Law Officers’ Department and set out that the plan is to start drafting a new law before the end of 2025. It is expected to take up to three years.
225. In order to make headway, some aspects of the original project will not be part of the Law drafting. The Project Board intends that in delivering a coherent updated single piece of legislation with new Highways Authority powers, drafting and development of new standalone policies would be made easier.
226. On 18 December 2024, a sink hole opened under Rouge Bouillon in St Helier, caused by a burst water main. The road was closed until 12 May 2025, leading to lengthy traffic jams in and around the town centre, as well as disruption for nearby schools. A particular issue was an unstable building which took some time to stabilise. While key organisations such as Government, Jersey Water and the Emergency Planning Office worked together to resolve issues, the incident highlighted the benefits of clarifying roles, responsibilities and accountabilities in managing work on, under and beside the road. This learning has been taken into the Road Law drafting preparation.
227. There are two routine meetings where the Highways Authority and the Roads Committees (which operate at Parish level) focus on shared priorities:
- monthly Utility Co-ordination meetings - to enable utility companies to share information and potentially minimise the impact of the need to dig up roads; and
  - Jersey Utility and Road Authority Forum (JURAF) - a more ‘as and when’ meeting enabling broader discussion of issues such as responsibilities in reinstating the quality of roads.

228. Neither of these meetings has a formalised Terms of Reference. In my view it is important that, for these sorts of meetings, everyone should have the opportunity to be clear on:
- who should attend and whether there is a need to ensure deputies
  - who will Chair the meeting and how decisions will be made
  - what the business is and how agenda items are submitted
  - how notes and actions will be managed; and
  - whether the output and outcome of the meetings will be reported to any other forum or group.
229. I think it is timely to establish good practice arrangements in light of the significant changes heralded by the proposed Road Law developments.
230. The States of Jersey use a digital mapping system called TrafficWorx, which provides the Highways Authority, Parishes and key stakeholders such as utility companies, contractors and emergency services with a shared planning database. This enables a consistent process and provides live information on the current and expected status of road works and diversion routes. The JURAF meetings have in the past been used to train Parish Roads Committee members on its use.
231. A key focus in Jersey is protecting roads from 'over topping' of the sea. A Highways and Coastal Project Board provides governance and oversees the delivery of the Highways and Coastal Programmes. This was agreed in the Government Plan covering the *Infrastructure Rolling Vote* and establishes a 130 year plan, in 25 year episodes, identifying funds needed to manage the shoreline.
232. The Highways and Coastal Capital Board noted in January 2025 that there was a significant backlog of road resurfacing schemes due to issues with the availability of budget and of local contractors. As a result, resurfacing work spend is expected to increase from £5.5 million in 2025 to £8.5 million in 2026 and beyond.
233. The Board also noted that £2.5 million of expenditure on relining the tunnel in 2026 remained unfunded.
234. In terms of setting standards for and overseeing highways infrastructure, I&E Operations and Transport has started but not finished three key documents:
- Highway Infrastructure Asset Management (HIAM) Policy (draft, August 2021). This important document is intended to:

- provide a document for Ministers that assists with decisions about managing and maintaining the highway infrastructure asset
  - provide a reference for staff members of the [then] Infrastructure, Housing and Environment (IHE) department and its consultants and contractors on specific aspects of highway maintenance
  - better understand risk and its impacts on the highway infrastructure asset; and
  - inform how the highway infrastructure is to be managed and the improvements to be achieved
- HIAM Strategy (draft, October 2023), intended to:
    - document the activities and processes of the Asset Management Framework; and
    - provide detailed information to senior decision makers to support investment decisions and enable longer term planning; and
  - HIAM Plan (draft, February 2022) intended to:
    - inform all staff about how the highway infrastructure is to be managed; and
    - support the Highway Infrastructure Asset Management Policy and Strategy.
235. Officers have reported insufficient resources to finish these important documents, linked to reduced ability to use external contractors for this and other tasks.
236. There is a completed Highways Inspection Manual which sets out the inspection requirements – for example Class 1 roads (routes with highest usage, supporting main population centres) are to be inspected monthly by driving the route. Alongside TrafficWorx, the I&E Department uses a system called HighwayWorx to establish road treatment intervals. The system then alerts the department about what needs to be done next. It provides a dashboard which identifies defects and interaction, and plots planned and reactive spend. It also automates the process of paying contractors – when jobs such as filling potholes have been completed and signed off, these are batched and companies alerted to submit invoices. There is though no interface with the Government’s Connect Finance system.
237. An independent condition survey is undertaken every three years, most recently in quarter one of 2024, which considers all road classes (see Exhibit 22).

## Exhibit 22: Road condition survey all classes 2024 (updated February 2025)



Source: I&E Department - Highway condition survey 2024 (February 2025 update)

238. Within the overall analysis, for Class 1 roads, 51% were 'serviceable', 6% showed functional impairment and 4% structural or severe surface impairment.
239. Expenditure on repairs and maintenance of highways is a balance of revenue expenditure, keeping the infrastructure safe and managing potholes, and longer-term capital investment in an improvement programme. The current annual revenue budget for all infrastructure managed by the Operations and Transport team, including highways, parks and gardens, buses, solid waste, sewers and sea defences, is around £41 million. The baseline capital commitment for all highways assets established in 2024 is £7.3 million including £5.5 million on carriageway restructuring and resurfacing. The independent condition survey indicates that this baseline funding level is the minimum to satisfy mandatory requirements.
240. The output from the highway condition survey has been analysed by the I&E Department to produce a long-term capital investment proposal over the next 30 years. The investment needed to achieve each of three scenarios has been calculated (see Exhibit 23).

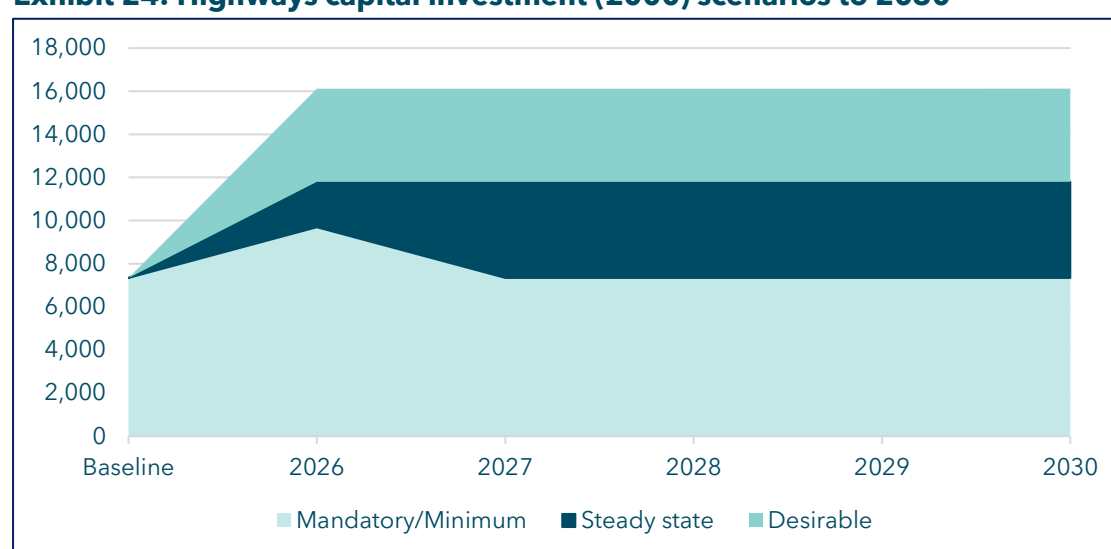
## Exhibit 23: Investment levels (£000) against outcomes over next five years

| Scenario          | Baseline | 2026   | 2027   | 2028   | 2029   | 2030   |
|-------------------|----------|--------|--------|--------|--------|--------|
| Mandatory/Minimum | 7,340    | 9,685  | 7,340  | 7,340  | 7,340  | 7,340  |
| Steady state      |          | 11,801 | 11,802 | 11,803 | 11,804 | 11,805 |
| Desirable         |          | 16,116 | 16,117 | 16,118 | 16,119 | 16,120 |

Source: I&E Department - 30 year highway modelling

241. The analysis prepared by officers proposes consistent funding across a 30-year period. The additional expenditure proposed in 2026 represents specific work which has been identified for the tunnel for that year only. In 'mandatory' and 'steady state' scenarios, the condition of the highways will continue to deteriorate over the period of investment. Conversely, forecasts are that deterioration will slow and overall condition will gradually improve with investment at the 'desirable' level.
242. Exhibit 24 sets out the necessary capital investment at the three levels, against the 2024 baseline. 'Steady state' will require annual investment of £11.8 million at 2025 prices.

**Exhibit 24: Highways capital investment (£000) scenarios to 2030**



Source: I&E Department - Highway condition survey update (February 2025)

243. I recognise that the preparation of a 30-year investment proposal, against a background of under investment and consequent deterioration, is progress. However, the proposal will be subject to debate as part of the forthcoming Budget for 2026-29.
244. Any agreed investment plan will need to be reviewed periodically to align to future condition surveys. For example, the impact of increasing numbers of four wheel drive and electric vehicles, which are heavier, might accelerate deterioration.

## Recommendations

**R15** Develop Terms of Reference for multi-party meetings about highway assets, so that everyone has the opportunity to be clear on:

- who should attend and whether there is a need to ensure deputies
- who will Chair the meeting and how decisions will be made
- what the business is and how agenda items are submitted
- how notes and actions will be managed; and
- whether the output and outcome of the meetings will be reported to any other forum or group.

Keep these up to date to reflect any changes to the Roads Law.

**R16** Complete the drafted documents:

- Highway Infrastructure Asset Management (HIAM) Policy (draft, August 2021)
- HIAM Strategy (draft, October 2023); and
- HIAM Plan (draft, February 2022).

Ensure that, together with the Highways Inspection Manual, these form a coherent and comprehensive set of references for all those working with highways assets.

## Work planned that should be prioritised

**P3** Agree a long-term investment plan for highway assets to address the outcome of the latest condition survey.

## Appendix One - Audit Approach

This audit used a combination of:

- a result-oriented approach (have the States met their objectives?)
- a problem-oriented approach (what are the problems and to what extent can the States resolve them?); and
- a system-oriented approach (are robust systems and processes in place?).

It used the following criteria:

- Are the risks and vulnerabilities in each critical infrastructure system understood and owned?
- Are the approaches to business continuity and other risk management agreed, jointly implemented and in line with best practice?
- Are high quality resilience standards agreed and set, with SMART Key Performance Indicators and aligned targets and tolerance?
- Are there effective arrangements for monitoring, reporting and scrutinising performance information by the operator/owner and by the Government of Jersey?
- Are actions taken in response to performance monitoring? Is there follow-through?
- Are assumptions underpinning risk assessments routinely challenged, tested and updated?
- Are systems tested for vulnerabilities with a clear understanding of what constitutes failure / near miss?
- What actions have been taken in response to any failures/near misses?

The audit approach comprised:

- a document request and subsequent review
- interviews and information exchanges with:
  - Government of Jersey staff; and
  - other stakeholders, including Arm's-Length Bodies and providers of transport links.

The documents reviewed included:

- Bridging Island Plan
- Bus:
  - Bus Contract Board papers
  - Procurement Strategy
  - The Jersey Franchise – a Partnership Story
- Crisis Resilience Improvement Plan
- Ferry:
  - Concession agreement; and
  - Procurement Strategy
- Jersey Emergency Risk Register 2025
- Jersey Resilience Forum:
  - records of meetings
  - rolling action plan from incident de-briefs; and
  - sub-group Terms of Reference and arrangements, including the Energy Resilience Working Group
- Health and Care Jersey:
  - Advisory Board meetings papers
  - Jersey Emergency Transfer Service (JETS):
    - Contract specification, novation and variation, and monitoring meetings
    - Incident reports October 2024 – March 2025
    - Procurement strategy 2025; and
    - Risk register entries 2019 – 2025
- Highways
  - Asset management – policy, strategy and plan (drafts)

- Condition Survey 2024 plus analysis
  - Highways Inspection Manual; and
  - Roads Law project information
- Ministerial Decisions (various) and accompanying Reports
- Ports of Jersey
  - Annual Reports 2021 to 2024
  - Policy Framework for the Ports Sector R4.2024; and
  - Strategic Business Plan 2024-2028
- Treasury and Exchequer Department – Blue Islands loan paperwork
- Visitor Economy Strategy – December 2023
- Visit Jersey Business Plan 2024

The following people contributed information through interviews or by correspondence:

- Blue Islands Chief Executive
- Brittany Ferries Chief Executive Officer
- Chief Officer, Department for the Economy
- Chief Officer, Infrastructure and Environment
- Chief Officer, Justice and Home Affairs
- Department for the Economy:
  - Head of Business Management and Governance; and
  - Sector Lead (Aviation and Marine)
- DFDS Vice President, Head of BU Channel & Baltics
- Emergency Planning Officer and Deputy Emergency Planning Officer
- Gama Aviation Account Manager
- Health and Care Jersey:

- Chief Operating Officer, Acute Services
- Head of Non-Clinical Support
- Head of Operational Resilience
- Head of Patient Access; and
- JETS Manager
- Infrastructure and Environment Department:
  - Associate Director, Highways
  - Head of Technical Support and Projects
  - Principal Engineer, Highways and Coastal
  - Senior Network Operations Manager; and
  - Senior Public Transport Planner
- Ports of Jersey
  - Airport Director
  - Chief Executive
  - Chief Operating Officer
  - Harbour Master; and
  - Head of Commercial
- Tower Transit Ltd Managing Director
- Treasury and Exchequer
  - Head of Shareholder Relations; and
  - Senior Category Lead (Commercial Services, Procurement Team) for JETS
- Visit Jersey
  - Head of Communications; and
  - Head of Product.

The fieldwork was carried out by affiliates working for the Comptroller and Auditor General, between February and June 2025.

## Appendix Two - Progress against recommendations from my report *Critical Infrastructure Resilience – Energy (June 2024)*

Based on information from interviews and document review as a part of this audit, and by considering information in the Government's C&AG Recommendation Tracker as at the end of March 2025, I have assessed progress as follows:

| Recommendation<br>(June 2024)                                                                                                                                              | Due date<br>and status                                                                                         | Progress                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Evaluation                                                                                                                                                                                  |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| R1: Review actions arising from the Crisis Resilience Improvement Plan (CRIP) in 2023 to ensure they are progressing as required.                                          | Initial date: 30 September 2024<br><br>Revised date: 31 March 2025<br><br>R1 is marked 'closed' in the Tracker | In May 2025, an updated version of the CRIP was published, reflecting the current status of the action plan.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | <b>Partly Implemented</b><br><br>There is more to do to assure progress on key actions needed to support Jersey's overall resilience.<br><br>Examples are set out in the body of my report. |
| R2: Prepare 'whole system' action plans with clear responsibilities and timelines to deliver the improvements identified in all recent critical incident de-brief reports. | Due date: 31 December 2024<br><br>R2 is marked 'closed' in the Tracker                                         | A 'whole system' incident de-brief rolling action log is well established. It notes the impact of the recommended action, when and where it was raised, its status (open / closed and red / amber / green), and the action owner.<br><br>However, the log does not include target dates for each action. Some 'high impact' actions contain little detail on dependencies or progress.                                                                                                                                                                                                                                                                                              | <b>Partly implemented</b><br><br>Timelines are not established. Key actions do not include sufficient information to assure that actions are in hand.                                       |
| R3: Engage with all external partners to reinvigorate the JRF, improve communication and encourage attendance at future meetings.                                          | Due date: 31 December 2024<br><br>R3 is marked 'closed' in the Tracker                                         | There has been considerable focus on improving engagement:<br><ul style="list-style-type: none"><li>- enhanced training for partners, including JESIP (Joint Emergency Services Interoperability Principles)</li><li>- JRF Newsletters issued between meetings (from February 2025); and</li><li>- relaunch of the 'Resilience Direct' web platform, to support communications across the resilience community.</li></ul><br>Following discussions as part of this audit, the JRF's decision to not take and issue notes of meetings has been reversed. This is important – the JRF needs to ensure clarity on stakeholder attendance, participation, decisions made and ownership. | <b>Implemented</b>                                                                                                                                                                          |

| Recommendation<br>(June 2024)                                                                                                                                                        | Due date<br>and status                                                 | Progress                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Evaluation                                                                                                                                                                                                                                                           |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| R4: Undertake a review to ensure that Business Continuity Plans for all Government assets demonstrate good practice, including in consideration of energy infrastructure resilience. | R4 was not accepted                                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | <b>Not Applicable</b>                                                                                                                                                                                                                                                |
| R5: Undertake a thorough and urgent review of the emergency planning arrangements for the La Collette site including contributions from all stakeholders and using expert input.     | Due date: 31 December 2025<br><br>R5 is marked 'open' in the Tracker   | <p>A JRF La Collette Working Group first met in November 2024. Following this, a JRF Energy Resilience Working Group (ERWG) was established, to enhance the energy resilience of the Island, focussing on critical national infrastructure and emergency preparedness. The La Collette Working Group concluded that, with the right membership, a better fit would be for the JRF ERWG to also address the site specific plan and risks for La Collette.</p> <p>The ERWG first met in February 2025, and the next meeting, in May 2025, confirmed the Director of Jersey Property Holdings as Chair and the Head of Health, Safety and Sustainability from Jersey Electricity Company as Deputy Chair. An updated draft Terms of Reference (ToR) was due for consideration and agreement in July 2025.</p> <p>Notes from the May ERWG meeting indicate a good level of attendance and participation, clear decisions made and actions logged.</p> | <p><b>On Track</b></p> <p>Establishing the multi-agency ERWG marks important progress.</p> <p>Ensuring the Group's next meeting agrees a robust ToR that supports effective emergency planning, and maintaining attendance and participation, will be important.</p> |
| R6: Introduce formal procedures to ensure that an updated La Collette emergency response plan is subject to ongoing monitoring, testing and review with all partners.                | Due date: 31 December 2025<br><br>R6 is marked 'closed' in the Tracker | <p>The draft ToR states the JRF ERWG will:</p> <p>'Assess, recommend and produce appropriate emergency response plans and emergency response arrangements for incidents at La Collette.'; and</p> <p>'Make recommendations to the JRF Training, Exercising and Learning Working Group on training and exercising matters.'</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | <p><b>Partly implemented</b></p> <p>The JRF ERWG is not yet well established. Formal procedures are yet to be tested.</p>                                                                                                                                            |
| R7. Ensure that energy infrastructure owners have high quality, proportionate and tested                                                                                             | R7 was partially accepted                                              | The draft ToR for the JRF ERWG reflects the requirement to:                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | <p><b>On Track</b></p> <p>Establishing this requirement as part of an agreed, finalised ToR for</p>                                                                                                                                                                  |

| Recommendation<br>(June 2024)                                                                                                                                                                                                                                                                                                                                                             | Due date<br>and status                                                                                                | Progress                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Evaluation                                                                                                                                                                                  |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>emergency planning and business continuity management arrangements in place that assure:</p> <ul style="list-style-type: none"> <li>• robust risk management of critical infrastructure resilience such that domestic and business customers can expect safe, reliable supplies; and</li> <li>• energy suppliers contribute positively to Islanders' sustainable wellbeing.</li> </ul> | <p>Due date: December 2026</p> <p>R7 is marked 'open' in the Tracker</p>                                              | <p>'Ensure stakeholders hold up-to-date emergency response, evacuation and business continuity plans'</p> <p>My 2024 Report noted that arrangements for ensuring the monitoring, reporting and scrutinising of resilience information by operators and owners of critical infrastructure for energy were not established. A significant mechanism intended to provide assurance in these areas was the launch by the JRF of Resilience Standards, which introduced new duties on all those likely to be engaged in an emergency response. However, I reported that these needed to be adjusted to take account of the need for a proportionate approach in Jersey.</p> <p>In my 2024 Report I emphasised a need to undertake a full consultation on the drafted Resilience Standards. This remains to be done and is important in securing delivery of this recommendation.</p> | <p>the JRF ERWG will be an important step.</p> <p>More widely, the JRF should ensure that proportionate and relevant Resilience Standards are in place for all critical infrastructure.</p> |
| <p>R8: Join up energy related workstreams across Government and the Jersey Resilience Forum to ensure that key individuals and groups have a common and complete picture, including of resilience issues, risks and opportunities.</p>                                                                                                                                                    | <p>Initial date: 30 September 2024</p> <p>Revised date: 31 March 2025</p> <p>R8 is marked 'closed' in the Tracker</p> | <p>JRF ERWG fulfils this recommendation. Coordinated by the Emergency Planning Office, the (draft) ToR membership is:</p> <p>Emergency Planning</p> <p>States of Jersey:</p> <ul style="list-style-type: none"> <li>- Police</li> <li>- Fire and Rescue</li> <li>- Ambulance Service</li> </ul> <p>Government of Jersey:</p> <ul style="list-style-type: none"> <li>- Strategic Policy, Planning and Performance</li> <li>- Communications Team</li> <li>- Public Health</li> <li>- Infrastructure and Environment</li> </ul> <p>Ports of Jersey</p> <p>Airport Rescue and Fire Fighting Service</p> <p>Jersey Electricity Company</p> <p>Island Energy Group</p> <p>Rubis</p> <p>Channel Islands Fuels</p> <p>ATF Fuels</p> <p>Petroleum Distributors (Jersey) Ltd</p> <p>Honorary Police</p> <p>Parish of St Helier</p>                                                       | <p><b>Implemented</b></p> <p>Subject to finalised Terms of Reference and their implementation</p>                                                                                           |

| Recommendation<br>(June 2024)                                                                                                                                                                                                                                              | Due date<br>and status                                                                                          | Progress                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Evaluation                                                      |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------|
| R9: Ensure that the Corporate Risk Register adequately records the risks in the area of energy provision and resilience.                                                                                                                                                   | Initial date: 30 September 2024<br><br>Revised date: 31 March 2025<br><br>R9 is marked 'open' in the Tracker    | There is more to do to ensure a mechanism is in place so that the Executive Leadership Team, and the Corporate Risk Register, are properly informed and up to date about Island-wide risks, including energy and transport resilience.<br><br>This recommendation remains 'open'.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | <b>Not implemented</b>                                          |
| R10: In line with the development of a new resilience law, update laws governing energy provision so that they are aligned, fit for purpose and drive high standards of resilience.                                                                                        | Due date: 31 December 2026<br><br>R10 is marked 'open' in the Tracker                                           | When I undertook my 2024 audit, the States indicated their plan to develop a new Resilience Law. I noted this and so did not make a recommendation in this area.<br><br>However, ensuring R10 can be implemented is dependent on new legislation.<br><br>My interviews and document review make clear that a new Law will not be developed during the current Government's term. The Tracker sets out that:<br><br>'[ ] work continues within the Cabinet Office and the wider preparedness function to carry out the necessary ground work to begin legislative development in 2026.'<br><br>In the absence of a clear, established work programme, I have brought together a number of 'Resilience Law' recommendations from my previous audit and this audit into new recommendations. | <b>Not implemented</b><br><br>See new recommendations R5 and R6 |
| R11: Ensure that the Resilience Standards and the updated Community Risk Register address the weaknesses identified, so that all energy infrastructure owners and users are compliant with the need to:<br><br>• set out and communicate the testing regimes that underpin | Initial date: 31 December 2024<br><br>Revised date: 31 December 2026<br><br>R11 is marked 'open' in the Tracker | In the absence of progress on a new Resilience Law, headway has been made by establishing the ERWG.<br><br>Its wider brief, and the specific responsibilities in the (draft) ToR to:<br><br>'Assess, recommend and produce appropriate emergency response plans and emergency response arrangements for incidents at La Collette.'<br><br>and<br><br>'Make recommendations to the JRF Training, Exercising and Learning                                                                                                                                                                                                                                                                                                                                                                   | <b>Not implemented but useful progress</b>                      |

| Recommendation<br>(June 2024)                                                                                                                                                                                                                                                                                                                                                           | Due date<br>and status                                                              | Progress                                                                                                                                                                                                                                                                                                                                                                                                                              | Evaluation                |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------|
| <p>infrastructure resilience.</p> <ul style="list-style-type: none"> <li>• report the outcomes of the testing and any subsequent improvement plans through the JRF, to inform the Corporate Risk Register; and</li> <li>• establish and communicate high quality business continuity management arrangements, including all elements of a recognised good practice approach.</li> </ul> |                                                                                     | <p>Working Group on training and exercising matters'</p> <p>The JRF ERWG notes that the group provides a forum and a mechanism to ensure that R11 is owned.</p>                                                                                                                                                                                                                                                                       |                           |
| <p>R12: Ensure that data requirements and data sharing protocols, including those needed to comply with the Resilience Standards and support the Community Risk Register, are in place in a risk-based way which seeks to anticipate the needs of critical incident responses.</p>                                                                                                      | <p>Due date: 30 June 2025</p> <p>The status of R12 is not noted in the Tracker.</p> | <p>The Tracker notes that work has been commissioned to provide a summary of research into data sharing for crisis response, both in Jersey and in other jurisdictions.</p> <p>It also states that a set of recommendations to improve current practices is being developed, focussing on preparation activities and improvements to data management maturity that will directly facilitate data sharing during crisis responses.</p> | <p><b>In progress</b></p> |

## Appendix Three - Summary of Recommendations, Work planned that should be prioritised and Areas for consideration

### Recommendations

- R1** Agree a definition of Island critical infrastructure. This should include critical transport infrastructure for sea, air and on-Island transport and the routes which fall within this definition.
- R2** Ensure that Ministers and (as relevant) other States Members are invited to participate in training and exercises for emergency response, covering both their decision-making roles but also, for example, as users of IT in relation to cyber security exercises. Log participation.
- R3** Update the Jersey Emergency Risk Register (JERR) to ensure it is:
- relevant to Jersey's capability and capacity to respond locally
  - complete, by carrying out an exercise requiring all JERR risk owners to confirm completeness of all entries in the JERR by the end of 2025; and
  - informed by and continuous with the management of 'chronic' risks, including through an understanding and ownership by the Executive Leadership Team of links to departmental Business Continuity Plans and Emergency Preparedness Plans.
- R4** Agree a timeline and publication process for developing a public facing Jersey Emergency Risk Register, so that all Islanders are informed about emergency risk preparedness and management and also understand how they can act to improve individual and community resilience.
- R5** Make a clear decision about progressing work to draft a Resilience Law, including a timetable and action plan. As part of this, take steps, through for example a proper stakeholder consultation exercise, to understand what might make the Resilience Standards a better fit for Jersey.
- R6** In line with the introduction of a new Resilience Law and further development of Resilience Standards, ensure there is a mechanism to integrate the Resilience Standards into contracts with owners and operators of critical infrastructure, including for transport links.
- R7** Develop a formal process for post-implementation review of new air route trials involving Government, Ports of Jersey and Visit Jersey. To commence with a detailed review of the impact of the new Paris route served by Blue Islands.

- R8** Introduce a structured process for reporting the identified Key Performance Indicators in respect of the Blue Islands loan so that achievement of the desired outcome can be evidenced or corrective action taken.
- R9** For patients whose travel to overseas appointments is organised by Health and Care Jersey, capture, analyse and report data about delayed and missed appointments. This should include the consequences in terms of patient health and wellbeing and cost and be used to assess risk and potential mitigations.
- R10** Urgently review oversight arrangements for the Jersey Emergency Transfer Service's current and proposed future contract, including to make sure processes are in place to:
- fully understand and address the impact of current weaknesses in the service, including by:
    - taking a patient outcome perspective; and
    - actively addressing the risks already logged and those that should be logged
  - align Key Performance Indicators to monitor all weaknesses identified, even if these are not yet contractual
  - develop routine reporting and escalation arrangements; and
  - establish joined up Business Continuity Plans.
- R11** Implement a robust procurement strategy to support a November 2025 decision on the award of the JETS contract, informed by views on how well the current service provision meets the States of Jersey's desired outcomes, and how well risks can be managed within the States' risk appetite for this service.
- R12** In procurement processes where changes to stated criteria or terms of contracts are proposed, and in post-contractual variations, document a comprehensive impact assessment, to include evaluation of value for money, the contribution to the States' strategic and operational priorities, an evaluation of whether the funding sources continue to be used appropriately, and the updated risk profile against risk appetite.
- R13** Ensure that the evaluation of the piloted East to West bus route includes an emphasis on value for money and contribution to the States' key priorities.
- R14** Ensure that the Key Performance Indicators for the bus service fully align with, for example, use of resources from the Climate Emergency Fund.

**R15** Develop Terms of Reference for multi-party meetings about highway assets, so that everyone has the opportunity to be clear on:

- who should attend and whether there is a need to ensure deputies
- who will Chair the meeting and how decisions will be made
- what the business is and how agenda items are submitted
- how notes and actions will be managed; and
- whether the output and outcome of the meetings will be reported to any other forum or group.

Keep these up to date to reflect any changes to the Roads Law.

**R16** Complete the drafted documents:

- Highway Infrastructure Asset Management (HIAM) Policy (draft, August 2021)
- HIAM Strategy (draft, October 2023); and
- HIAM Plan (draft, February 2022).

Ensure that, together with the Highways Inspection Manual, these form a coherent and comprehensive set of references for all those working with highways assets.

### **Work planned that should be prioritised**

- P1** Ensure that all Jersey Resilience Forum meetings and associated Working Group meetings are fully documented with a sufficient record to provide an audit trail of attendance, participation, information considered, challenge and discussion, decisions made, action points arising and action follow through.
- P2** Prepare a plan for the consideration of options to develop a Southern supply route in liaison with Ports of Jersey.
- P3** Agree a long-term investment plan for highway assets to address the outcome of the latest condition survey.

### **Areas for consideration**

- A1** Design and implement a formal feedback mechanism for the Jersey Resilience Forum Executive Group to brief the Government's Executive Leadership Team.

- A2** Introduce an annual process for risk owners to confirm ongoing relevance of all risks in the Jersey Emergency Risk Register.
- A3** Consider options for collection of accurate data on numbers of properties offering visitor beds on online platforms such as Airbnb.



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