

By EMAIL: Deputy Louise Doublet. Chair, Health and Social Security Scrutiny Panel

19 February 2026

Dear Deputy Doublet,

P.15/2026 – Draft Health and Social Care Professionals Register (Jersey) Law 202-

Following the recent request to review the lodging of proposition [P.15/2026 – Draft Health and Social Care Professionals Register \(Jersey\) Law 202-](#), by the Health and Social Security Scrutiny Panel, please find the Jersey Care Commissions response to the questions raised:

1. **The level of consultation that was undertaken with the Commission during the drafting of the proposed law and whether the organisation was satisfied with the scope and extent of that consultation.**

The Commission has had good levels of engagement with Government of Jersey officers throughout the development of the draft law. The Jersey Care Commission Board has been briefed at a strategic level, and there have also been several valuable meetings with Commission executive staff, which provided constructive opportunities to review proposals and offer operational feedback.

2. **If the projected ongoing costs of £72,000 per year, along with the £85,000 set-up cost, are sufficient to resource the increased registration volume, system management demands, and enforcement responsibilities assigned under the draft Law. Does the Commission envisage the ongoing costs will need to increase in future? Has inflation been taken into account for future funding?**

The estimated projected costs are based on our direct experience of establishing the registration system previously. In particular, the project management element reflects the need for a specialist technical IT project manager who can ensure that our system provider delivers the solution to the agreed scope, specification and standards, and who can also navigate the required Digital Services processes. This is a specialist function that we do not have in-house, and therefore external consultancy support is essential.

The allocation for user support is likewise informed by our experience when launching the earlier system. At that time, a significant level of enquiry handling, call-backs and onboarding assistance was required, despite the fact that the previous system involved registering individuals who were already known to us.



Under the new law, we will be registering many professionals who have never registered with the Commission before, and we therefore anticipate a comparable or greater level of support need during the transition period.

At this stage, we do not anticipate that these costs will increase beyond the levels set out; however, the cost estimates are based on a number of assumptions. Some of these, such as the projected number of new registrants have been provided by the Government of Jersey.

We have been explicit in our discussions with Government that where assumptions are used, there is a risk that the associated costs may be underestimated. While we do not anticipate significant additional costs, we have advised the Cabinet Office that the Commission would not be able to absorb any financial risk arising from underestimation.

3. If the Commission is confident that its current IT systems and digital infrastructure can be scaled and adapted to support the expanded register, the wider range of professional groups, and the enhanced data-management and reporting requirements?

We believe that, with the appropriate budget and sufficient preparation time in place, the Commission will be well positioned to scale and adapt our existing IT systems and digital infrastructure to support the expanded register and its enhanced requirements.

We note that the draft law:

requires all health and social care professions to register with a UK regulatory body under UK legislation in order to register with the Commission to practise in Jersey. Registration in Jersey is a form of secondary registration, which acts as a 'check' on UK registration and ensures that fitness to practise decisions made by national bodies can be implemented in Jersey.¹

4. Do you believe that the modelling of the draft law, which is in line with UK law, will cause any unforeseen problems and if so, what are these?

We have highlighted to GOJ officers that, as the number and range of professional groups increases, there is an associated risk that some registrants may not engage with the process or may fail to register in a timely manner. This could place the Commission in a position where it must consider referral for prosecution to uphold the requirements of the law.

¹ [P.15/2026 – Draft Health and Social Care Professionals Register \(Jersey\) Law 202-](#)



To mitigate this risk, we will work closely with HCJ to ensure that managers across the relevant services are fully engaged and supported to encourage compliance among their staff.

We will also need to work with the GOJ Communications Team to ensure that messaging is clear and consistent to all health and social care professionals working across Jersey. This collaborative approach will help promote early engagement, reduce the likelihood of enforcement action, and support a smooth transition to the new registration arrangements.

5. ***As of January 2026, the Minister for Health and Social Services has decided that fees will not be charged to professionals. Marginal costs of the improved registration system resulting from this Law will therefore be funded by HCJ and by reprioritising spending within the Commission.***²

The Commission is unable to meet these costs through reprioritisation in either 2026 or 2027 without the provision of additional funding. Substantial adjustments have already been made in the last two years to accommodate the required budget reductions, leaving no scope for further internal reallocation. It remains our clear understanding that GOJ / HCJ will assume responsibility for funding these costs.

6. **Does the Commission believe that a registration fee should be considered in the future?**

We consider this to be a matter of policy for the Minister and Government of Jersey, and therefore not something on which it would be appropriate for the Commission to offer a view.

We have noted that the Panel will publish any responses on the States Assembly website.

Please do not hesitate to contact me, if you have any questions.

Yours sincerely

Becky Sherrington
Chief Inspector

² [P.15/2026 – Draft Health and Social Care Professionals Register \(Jersey\) Law 202-](#)