06 November 2025

Deputy Louise Doublet Chair – Assisted Dying Review Panel

States Greffe St Helier, Jersey

BY EMAIL

Draft Assisted Dying Law (Jersey) 202– – Financial Review Response

Dear Deputy Doublet,

At the request of the Assisted Dying Review Panel, [Anonymous 1] has undertaken a review of the Draft Assisted Dying Law (Jersey) 202–, focusing exclusively on its financial implications and the related allocations set out in the Proposed Budget 2026–2029.

While the legal and ethical dimensions of the proposed legislation fall outside our professional remit, our analysis has been prepared through a financial and operational lens, drawing on our expertise in financial management, cost modelling, and budgetary assessments.

In addition to this letter, we have provided a Budget Commentary Excel [Appendix 1] containing key financial observations for consideration. This supplementary document is intended to support the Panel's evaluation of the proposed budget assumptions and to highlight potential areas for refinement as the framework develops.

We hope this submission provides useful insight to assist the Panel in its deliberations. Our comments below address the two financial questions raised in the Panel's letter dated 27 October 2025.

1. **Adequacy of the Financial Considerations within the Draft Law**

The financial considerations contained within the Draft Assisted Dying Law (Jersey) 202– appear broadly framed and indicative rather than fully costed. While the draft acknowledges implementation costs, it does not outline the underlying financial assumptions, such as workforce capacity, administrative infrastructure, or governance structures required to operate the service.

From a financial management standpoint, the absence of a detailed cost breakdown the budget introduces uncertainty around whether the estimated funding envelope is sufficient.

Observation: The Draft Law could be strengthened by incorporating an annexed financial impact assessment and sensitivity analysis to support long-term fiscal sustainability.

2. **Sufficiency of Proposed Budget Allocations (2026–2029)**

The Proposed Budget outlines expenditure growth allocations for Assisted Dying services totalling approximately £2.66 million over four years (£525k in 2026, rising to £718k in 2029).

Based on comparative benchmarks from small jurisdictions and early-stage rollouts of similar frameworks internationally (e.g. Western Australia), initial establishment costs typically exceed early projections and required adjustments in year 2-3 of the project, this was largely due to governance setup, specialist training, and cross-agency coordination.

Assessment: While the proposed budget provides a credible starting point, it appears at the lower end of the range required to establish a robust, compliant, and ethically governed service. We recommend incorporating contingency provisions and periodic budget reviews to allow recalibration as actual cost data becomes available.

We appreciate the opportunity to contribute to this important review and would be pleased to elaborate further should any clarification be helpful.

Yours sincerely,

Anonymous 1

Appendix 1 - Budget Commentary Excel

Breakdown: per the letter

Category	2026	2027	2028	2029	Total
Implementation	201,022	73,453			274,475
Training (development and delivery)	230,000	153,631	76,550	30,778	459,619
Information management	5,000	10,000	15,000	10,000	40,000
Public information		8,860	-	-	8,860
Recruitment	30,000	130,000	-	-	160,000
Staffing costs (administrative and clinical)	-	169,408	298,240	399,342	898,330
Facilities/ equipment/ supplies	-	45,770	31,540	35,410	112,720
Wellbeing & support services	-	38,988	77,976	77,976	194,940
Assurance & Delivery committee	-	32,430	89,659	65,659	187,748
Regulation & oversight	58,804	63,918	98,835	98,835	320,392
TOTAL	**524,826**	**726,458**	**687,800**	**718,000**	**2,657,084**
	524,826	726,458	687,800	718,000	2,657,084
	-	-	-	-	-

Financial Commentary – Assisted Dying Programme Budget (2026–2029)

We have reviewed the budget you presented and examined the annual review of the Western Australia panel. Our detailed commentary is set out below, structured around two key areas:

1. An assessment of the budget against established financial principles for sound budget preparation; and

2. Identification of key gaps within the detailed breakdown, informed by our research and experience with comparable projects.

1. Budget Principles

The current draft does not fully align with established public-sector budgeting standards. Key structural and governance principles are not applied consistently across the plan:

Inflation: No clear annual uplift for staffing, training, or facilities. Any costs held flat across 2027–2029 materially understate real funding needs.

Sensitivity analysis: There is no scenario testing for variations in uptake, implementation delays, or legal/clinical complexities. The budget should model at least a ±10–15% swing in demand and cost drivers.

Contingency: No explicit contingency provision is made. Industry best practice is 5–10% of total expenditure to absorb inflation, risk, or project slippage.

Cost phasing and classification: One-off implementation costs and recurring operational costs are not clearly split or tracked separately. This limits transparency and weakens long-term affordability assessments.

Programme Management Office (PMO): Governance, reporting, and delivery-tracking overheads appear embedded within broader cost categories. These should be separately costed as a core control mechanism.

2. Key Gaps in the Detailed Breakdown

Analysis of the ten cost lines identified several high-impact omissions and unrealistic assumptions:

Recruitment – Treated as a one-off cost, but turnover, role evolution, and retention pressures will create recurring requirements. Budget should include 10–20% annual staff replacement cost.

Staffing Costs (Administrative and Clinical) – No clear split on inflation, progression, or service-growth adjustment. A no replacement cost profile from 2027 onwards is financially unrealistic given public-sector pay uplifts and rising service demand.

Training and Development – Training declines abruptly after 2028 with no refresh cycle. Ongoing induction, CPD, and certification updates will require sustained annual funding. Also need to consider staff turnover having an impact on the training budget.

Information Management and Digital Systems – Underfunded relative to data protection and record-keeping obligations. Expect continuing costs for secure storage, licences, and cybersecurity compliance.

Public Information and Communications –Potentially understated. A credible awareness campaign covering design, digital media, and accessibility will require a substantially higher allocation than the £8.8k proposed.

Conclusion

The current budget provides a useful framework but reflects an implementation-only view rather than a full lifecycle financial plan. Without indexation, contingency, or ongoing governance and oversight funding, it risks early cost over-runs and under-delivery in later years as seen by other jurisdictions. Incorporating the principles above would materially strengthen credibility and operational resilience.

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