

4 December 2025

Deputy Inna Gardiner  
Chair, Public Accounts Committee  
Scrutiny Office, States Greffe  
Morier House, St Helier  
Jersey JE1 1DD  
Via [scrutiny@gov.je](mailto:scrutiny@gov.je)

Dear Deputy Gardiner

### Arm's Length Bodies, Grants and Subsidies Review

Further to your letter of 24 November, please see below.

**1. In the last 10 years have any of your organisation's core objectives and responsibilities been altered and, if so, what was the basis and rationale for doing so?**

The purpose of Jersey Heritage Trust (JHT) was established in the 1983 Act of Incorporation as (in translation) the acquisition, conservation and exhibition of moveable and immovable property forming the heritage (*patrimoine*) of Jersey.

This was further interpreted in the 1999 Constitution approved by the States and reconfirmed most recently in the current Constitution amended in response to The Charities (Jersey) Law 2014 by the adoption of P.142/2020

*The Bailiwick of Jersey's heritage and culture is special. The purpose of The Jersey Heritage Trust is to care for it, promote wide access to it, act as advocates on its behalf, and bring imagination to telling its stories so that we inspire people to create a better Island for everyone.*

The 2020 Constitution expanded the functions of JHT recognising the adoption of the Public Records (Jersey) Law 2002 and the transfer of some Planning related functions in respect of archaeology and the Historic Environment by SLA with the Environment Department from 2005.

These responsibilities were further interpreted and detailed in the 2022 Strategic Partnership Agreement.



As documented by these agreements with Government, the responsibilities of JHT have grown on the basis of four contextual factors:

1. the States/Government's long-standing policy on outsourcing its own heritage responsibilities;
  2. the on-going establishment of an Island heritage service from a largely blank sheet;
  3. the internationally evolving concept of 'heritage' and the desire to meet basic international standards in heritage management, and;
  4. natural growth in the volume of heritage assets required to be under management.
- In respect of the policy of outsourcing cultural services, it is important to note that the Island's heritage service as it is today has grown largely outside Government. While JHT provides asset management and services on behalf of the Société Jersiaise, the National Trust for Jersey, some Parishes and some private owners and depositors, it is also the Government's principal delivery partner for heritage. Therefore if the Government expands its own responsibilities in relation to heritage it likely has an impact on the development of responsibilities of JHT. An example might be the establishment and evolution of the public records management regime.
  - In respect of the establishment and subsequent evolution of the services, it is important to note that Jersey has been late, relative to comparable jurisdictions, in the development of heritage services. What began in the UK and some Crown Dependencies in the nineteenth century in relation to the statutory management of records and monuments has been established in Jersey largely in the twenty-first century. The recent expansion of JHT reflects this development.
  - In respect of the changing meaning of 'heritage', while the 1983 Act focused on a traditional view of heritage as old buildings and artefacts including art collections, 'heritage' as currently defined in relevant international conventions is now very much wider, including intangible heritage, digital heritage, natural and landscape heritage, community and diasporic heritage and sensitive and contested heritage, etc. Examples of practical implications and responses to that evolution include the Historic Environment Record to document landscapes, archaeological potential and intangible cultural associations, and the capacity of the Archive to preserve growing born-digital government records and to do so securely in a world of evolving cyber-risk. This evolution is reflected in the Government's 2022 Heritage Strategy and Arts Strategy. Both strategies emphasise the importance of meeting changing best practice and public expectations of cultural provision and the intersection of 'arts' and 'heritage'.
  - Finally it is important to note that responsibilities grow in volume as well as scope. Legislation for records, for example, has capital as well as business as usual implications. To manage both the backlog and growth of records extension of the archive repository has been achieved, but management of the records (conservation, cataloguing, access, etc) requires the maintenance of specialist archive staff. Likewise as more portable antiquities are discovered as a result of building development and hobbyist metal detecting, the Historic Environment Records must be maintained to identify the significance of finds and record information in support of

the Planning regime. Objects thereby acquired by the Government must be researched, conserved, stored and displayed.

Fundamentally, the rationale for much of the evolution of responsibilities for heritage is a response to compliance with the international conventions, in part as reflected in local legislation and compliance with the standards required of the accreditations we maintain as part of our Strategic Partnership Agreement to provide service quality reassurance for the funder and to enable us to participate in international heritage partnerships.

***2. Do you see the role of the organisation being updated in the future, and if so how?***

The establishment of services in the Strategic Partnership Agreement in 2022, achieved for the first time, in my view, arrangements for an appropriate 'national' heritage organisation as anticipated, allowing for subsequent developments in the concept of heritage, when the States created JHT in the 1980s.

While it is likely that future evolution of heritage services in response to say, climate and environmental duties, social, ethical and human rights duties, community involvement, digital heritage, etc will be expected, the broad scope and infrastructure of JHT, if it can be sustained, is now in place and appropriate to scale.

Specific examples of immediately forthcoming developments in responsibility include:

**HERITAGE (JERSEY) LAW 202-**

The Draft Law defines JHT as the body responsible for receiving reports, recording information on the Historic Environment Record and making recommendations to the Viscount on determination of status. Related to the Law and in the context of a savings programme at the Environment Department, JHT is taking on archaeological services previously outsourced to the UK. While these are all significant new responsibilities, JHT has developed the infrastructure to support this role over the last few years and if resources remain sustainable can undertake this at no additional cost to GoJ.

**DRAFT PUBLIC RECORDS (JERSEY) AMENDMENT LAW 202-**

The existing Law and the Draft Amendment define JHT as the body responsible for a number of duties. While the amendment does not fundamentally change how public records are dealt with it does likely increase the volume of records and therefore the impact of the responsibility. The Archivist has written separately to PAC on this recently, noting that the resource implications resulting from amendments to the law can be met by JHT but only if staff numbers at the Jersey Archive remain at their 2025 level.

**CONVENTION FOR THE SAFEGUARDING OF THE INTANGIBLE CULTURAL HERITAGE**

The UK recently adopted this 2003 Convention. The option is open to the Minister to ask for extension to Jersey and there have been preliminary discussions with DCMS on that possibility. The minimum compliance obligation in the Convention is to maintain an inventory of ICH. Responsibility for an inventory of ICH is with JHT in the SPA and over the last two years we have worked with the community to prepare a draft. As above, should the Convention be extended to Jersey, the work to maintain and develop the inventory can be undertaken for Government with no additional resources but sustainably only if current levels of resource can be maintained.

## OTHER INTERNATIONAL CONVENTIONS

Longer term it is important to anticipate the possibilities and implications of joining other international partnerships. One example might be the European Landscape Convention of the Council of Europe. Another might be further Cultural Routes of the Council of Europe, such as the Norman Route under discussion relating to the 2027 Year of the Normans.

**3. Please can you advise the PAC if you have ever received any top up grants and if so, what were they for and if not, could you advise if top up grants would be open to you?**

Top-up Grant Agreements have been used for the following:

- 2018 Jersey Independent Care Inquiry
- 2020 COVID19 going concern
- 2024 Jèrriais teaching for adult learners and Jersey Museum Free Entry
- 2022-2024 Elizabeth Castle Capital funding

**4. What recommendation has been made by the Government of Jersey concerning raising funds separately to the government grant?**

Once funds allocated for statutory services are allowed for, JHT raises more than half the cost of the service. The grant, level of self-generated income and service costs are agreed as part of the business planning and grant appraisal process each year. Specific recommendations in discussion this year have focused on retail at attraction sites.

**5. Please can you confirm the total marketing spend for the years 2022- 2025, broken down by on-island and off-island campaigns and further broken down by staff remuneration and consultancy costs?**

|               | 2022    | 2023    | 2024    | End Q3 2025 |
|---------------|---------|---------|---------|-------------|
| Marketing     | 205,613 | 270,792 | 244,746 | 143,215     |
| JH staff cost | 55,730  | 57,458  | 44,717  | 37,332      |
| Total         | 261,343 | 328,250 | 289,463 | 180,547     |
| Consultancy   | 24,205  | 49,910  | 34,285  | 43,549      |

All marketing campaigns are in-Island. There are no off-Island campaigns. In 2026 JH will do a small amount of digital advertising in UK to promote Heritage Lets. JHT has one in-house post responsible for marketing. There have been two periods of maternity leave/cost over 2022-2025 covered by consultancy. Cost include JH website and social media presence and all JH activity including JH Membership, Heritage Pass, Heritage Lets, Visitor Sites, events, recruitment, education, Jersey Archive.

**6. Please provide any consideration as to the size of your board, and confirm if any recommendation has been given by the Government of Jersey in this regard?**

The size of the Board is determined by the Constitution approved by the States. Trustees are unpaid volunteers so the size of the Board is not reflected in costs.

**7. Do you believe there is a need for further reviews of your own or other Arm's Length Bodies, either separately or jointly?**

The 2022 Heritage Strategy proposed that the Government lead on a 'sector resilience review', under a programme with the aim to 'grow local collaboration'. This referred to strategic activities in

- Investing in cultural partnerships and collaborations to bring the cultural sector (including Government and NGOs) closer together
- Building capacity in local communities in engaging and cost effective ways
- Investing in knowledge creation, skills and organisations where help is most needed

This has not yet been progressed but it remains the case, in my view, that it would be a worthwhile exercise, which would answer some of the broader questions raised in your review while taking account of the specific nature of the heritage sector, comprised as it is of independent charitable organisations being JHT, Société Jersiaise, National Trust for Jersey and Channel Island Occupation Society, all of which in one way or another intersect with Government as delivery partners even though none are ALOs in the sense of being owned by Government.

**8. In your view would establishing a joint premises for Arm's Length Bodies provide efficiencies and what considerations have been held on this matter?**

The heritage sector bodies do in a sense share premises in that JHT manages properties for Société Jersiaise, National Trust and the Government. Office-based activity is undertaken in properties owned by the organisations themselves, largely as heritage properties. The only exception is a commercial office space leased by JHT pending the conversion of one of our own properties for that purpose.

**9. In your view would establishing joint boards for Arm's Length Bodies provide efficiencies and what considerations have been held on this matter?**

As the heritage organisations are all independent charities and registered as such and all with voluntary boards this question is not relevant to us.

**10. In your view would narrowing scope or objective of any Arm's Length Bodies provide efficiencies and what considerations have been held on this matter?**

The scope and objectives of Jersey Heritage Trust represent an efficiency in combining the resources of the Government and heritage organisations. The organisation, amongst other things, delivers the Government's own compliance with a number of International Conventions so those objectives are unavoidable. For a number of reasons, including the lower costs of JHT and self-generated income, it is not likely in my view that scope reduction would provide further efficiencies and would likely increase the cost to Government.

**11. Would joint procurement by any of the Arm's Length Bodies provide efficiencies and what considerations have been held on this matter?**

This is one of the issues that might be considered in the review referred to in the answer to question 7.

Yours sincerely

A handwritten signature in black ink, appearing to be 'Jonathan Carter', written in a cursive style.

**Jonathan Carter**  
**Chief Executive**