

STATES OF JERSEY



JUSTICE AND HOME AFFAIRS: CESSATION OF RESTRUCTURE (P.24/2019) – AMENDMENT

Lodged au Greffe on 19th March 2019
by the Connétable of St. Lawrence

STATES GREFFE

JUSTICE AND HOME AFFAIRS: CESSATION OF RESTRUCTURE (P.24/2019) –
AMENDMENT

1 PAGE 2, NEW PARAGRAPHS (b), (c) and (d) –

After paragraph (a) insert the following new paragraphs –

- “(b) further to the requirements of paragraph (a), to request the Minister for Home Affairs to ensure that the final operating model for the Justice and Home Affairs Department maintains –
 - (i) an independent, recognisable and dedicated States of Jersey Police Force, led by a Chief Officer and Deputy Chief Officer as required by Article 8 of the States of Jersey Police Force Law 2012 and appointed in accordance with Article 6 of the States of Jersey Police Force (Chief Officer and Deputy Chief Officer) (Jersey) Regulations 2017; and
 - (ii) a clearly recognisable and dedicated Jersey Customs and Immigration Service, led by a Head of Service who will also be the Agents of the Impôts, appointed in accordance with Article 4 of the Customs and Excise (Jersey) Law 1999, and who shall not be the same person as either the Chief Officer or Deputy Chief Officer of Police; and
 - (iii) a clearly recognisable and dedicated Jersey Fire and Rescue Service, led by a Chief Fire Officer, as provided for by Article 4 of the Fire and Rescue Service (Jersey) Law 2011; and
 - (iv) a clearly recognisable and dedicated States of Jersey Ambulance Service, led by a Chief Ambulance Officer as at present, who shall not be the same person as the Chief Fire Officer; and
- (c) that any changes to the requirements stipulated by paragraph (b) will only be made if the Assembly has approved a proposition to that effect; and
- (d) that, without prejudicing the ongoing potential for change provided by paragraph (c), the process for making substantive and permanent appointments to the roles stipulated in paragraph (b) should commence, where required, within 6 months of this proposition being adopted; and”.

2 PAGE 2, PARAGRAPH (b) –

Re-letter paragraph (b) as paragraph (e) accordingly.

CONNÉTABLE OF ST. LAWRENCE

Note: After this amendment, the proposition would read as follows –

THE STATES are asked to decide whether they are of opinion –

- (a) to request the Council of Ministers to bring forward for debate the necessary legislative changes required to implement the proposed reorganisation of the Department of Justice and Home Affairs and to cease implementation of the proposed reorganisation (including any transfers of staff and budget but excluding any consultation or investigation) until those legislative changes have been adopted; and
- (b) further to the requirements of paragraph (a), to request the Minister for Home Affairs to ensure that the final operating model for the Justice and Home Affairs Department maintains –
 - (i) an independent, recognisable and dedicated States of Jersey Police Force, led by a Chief Officer and Deputy Chief Officer as required by Article 8 of the States of Jersey Police Force Law 2012 and appointed in accordance with Article 6 of the States of Jersey Police Force (Chief Officer and Deputy Chief Officer) (Jersey) Regulations 2017; and
 - (ii) a clearly recognisable and dedicated Jersey Customs and Immigration Service, led by a Head of Service who will also be the Agents of the Impôts, appointed in accordance with Article 4 of the Customs and Excise (Jersey) Law 1999, and who shall not be the same person as either the Chief Officer or Deputy Chief Officer of Police; and
 - (iii) a clearly recognisable and dedicated Jersey Fire and Rescue Service, led by a Chief Fire Officer, as provided for by Article 4 of the Fire and Rescue Service (Jersey) Law 2011; and
 - (iv) a clearly recognisable and dedicated States of Jersey Ambulance Service, led by a Chief Ambulance Officer as at present, who shall not be the same person as the Chief Fire Officer; and
- (c) that any changes to the requirements stipulated by paragraph (b) will only be made if the Assembly has approved a proposition to that effect; and
- (d) that, without prejudicing the ongoing potential for change provided by paragraph (c), the process for making substantive and permanent appointments to the roles stipulated in

paragraph (b) should commence, where required, within 6 months of this proposition being adopted; and

- (e) to request the Council of Ministers to agree, as a matter of policy, that in respect of any proposed departmental reorganisation which requires legislative changes to be enacted, any such reorganisation should not be implemented (including the transfer of staff and budget but excluding any consultation or investigation) until such time as the necessary legislative changes have been adopted by the Assembly.

REPORT

Initial Proposition

I support the initial proposition of the Deputy of St. John ([P.24/2019](#)) and commend him for bringing it before the Assembly.

It is logical and reasonable to expect that any necessary legislative changes needed to implement the new Departmental Target Operating Models would be brought before this Assembly for debate and agreement first, and prior to any further work to implement the new structures taking place. Any other approach is, in my view, disrespectful to this Assembly and, by extension, to the Public of Jersey.

Yet it is far from clear to me and, I believe, to other Members, that the Deputy of St. John's reasonable request reflected the intended course of action of a number of executive Departments.

As such, the proposition of the Deputy of St. John is important and necessary.

Purpose of this Amendment

This amendment is intended to build on the initial proposition and further strengthen the democratic oversight of the proposed reforms to the Justice and Home Affairs ("JHA") Department.

It has similar intentions, in that it seeks to ensure that the Assembly is not completely bypassed in the making of important decisions that will fundamentally impact on the nature and delivery of key frontline public services.

As mentioned above, the initial proposition requests that any further progress on work to implement the new JHA structure, and indeed any departmental reorganisation, is postponed until the *necessary legislative changes are passed*.

I believe that there are additional, wider concerns to be addressed, particularly regarding the proposed JHA structure, which is why I have lodged this amendment.

I suspect that a large proportion of the changes proposed to the JHA structure can be implemented *without a change in legislation* or can be managed within the current legislation.

This runs the risk of such changes either not being impacted by the initial proposition, or simply being paused for a short period, and then implemented in any event once the required legislative changes, where they apply, have been debated (even if they are ultimately rejected).

The initial proposition is on the correct path although, in my view, is not currently *watertight* in dealing with the wide-ranging concerns that have been raised with me and other Members regarding the manner in which the proposed changes to JHA have been managed to date.

Proposed restructure of Justice and Home Affairs

It follows that this amendment is focused on the proposed restructure of the Justice and Home Affairs Department as published on 4th February 2019.

The proposed structure is helpfully attached as an Appendix to the initial proposition.

As can be seen, it suggests the merger of the States of Jersey Police and the Jersey Customs and Immigration Service, with the consequential *loss of the roles of Deputy Chief Officer of the Police and the Head of Service for Customs and Immigration*.

These roles are amalgamated into just one position – that of the Chief Police Officer (referred to as the ‘Head of Law and Border Enforcement’).

Similarly, the Fire and Rescue Service is merged with the Ambulance Service, with just one Chief Officer – *representing the loss of a Chief Officer of one of Jersey’s key emergency services*.

Concerns

First, I have not seen a detailed business case for the merger of these distinct essential services.

I do not believe that anyone, including the staff in these Services, the Minister for Home Affairs, or this Assembly, has been presented with an *evidence-based rationale* setting out the likely advantages of assimilating these services (and indeed the associated risks and how these will be mitigated).

It might be that such a case exists, and that there are strong arguments in favour of the proposals, but they should be *put forward openly, widely consulted upon, and scrutinised* before the changes are made (if indeed they are still thought to be appropriate after that process has been undertaken).

These are essential frontline services, and their successful operation is often a matter of life or death for many Islanders.

There can be no doubt that this is a serious matter in terms of public safety, and the *potential risks of making poorly informed reforms are real and significant*.

My second concern is that I am not confident that these services, in whatever structure they exist, *can manage in the short to medium term with the proposed loss of capacity in these leadership roles*.

Merging the Chief Officer of Police, Deputy Chief of Police and Head of Service for Customs and Immigration into one role appears, to me, to create *an unmanageable post*.

Similarly, I am not certain (and again I have not seen any evidence) to confirm that it is sensible to merge the Chief Officer posts for the Ambulance and Fire Services.

In particular, I would question if there is a person who exists, certainly from within the Island, but also within the British Isles, who has the skills and competencies required to properly fulfil the role of both the Chief Ambulance Officer and the Chief Fire Officer. They are very distinct jobs.

Again, and in my view, *the risks to the Island, especially in terms of public safety, appear to be significant.*

Maintenance of the current position in the interim

This Amendment therefore requires, *for the time being, that these leadership roles for our frontline and emergency services are maintained.*

The Amendment further requests that *the distinct services are themselves maintained for the time being, until such time as a properly evidenced case is put forward for change which can be fully considered, broadly consulted upon and scrutinised.*

That properly evidenced case must demonstrate that it has the *support of the essential frontline Services themselves, the Public, and of this Assembly.*

Scrutiny

I know that *Scrutiny are proposing a review of all the Target Operating Models* currently being developed as part of the One Government reforms; this can only be welcomed by all Members and by the Public we serve.

This proposition and amendment will complement Scrutiny's work by ensuring the Assembly has the final say on any proposed changes within JHA.

It is important that the Assembly does so *in consideration of Scrutiny's findings and recommendations.*

Any other approach involves the likely risk of Scrutiny being politely listened to but ultimately ignored by the executive.

Open to change

I fully accept that, *in the appropriate circumstances, change is necessary.*

From my experience, the Home Affairs Services are open to and content with change – they are flexible, adaptable and innovative.

It is important to stress therefore, that *the amendment is not about blocking change, and it does not prevent change.*

This is confirmed by the proposal of new paragraph (c). When a case is made, paragraph (c) *allows for the assimilation of services and officer roles, if that is seen as appropriate.*

I think it is important, however, that *this is only permitted once consent has been given by the Assembly.*

If that is not the case, it undermines the ability of this Assembly to maintain a proper democratic oversight of the proposed reforms to these crucial Island services which are so important to, and valued by, the Public.

Continued co-operation and joint working

This Amendment *does not prevent continued close working, joint working and co-operation* between all the services in Justice and Home Affairs.

This culture already exists within the Department, and any suggestion that these services operate in silos is ill-founded and simply not the case.

There are a number of areas of close co-operation, where it is appropriate.

By way of example, the Police and Customs operate a joint financial crime unit and a joint intelligence function, and the Fire and Ambulance Services co-operate in respect of providing an appropriate first response to incidents, especially in instances where resources are already deployed elsewhere.

This work should, and can, continue and develop.

However, it is important to note that joint working and co-operation in certain areas *should not be taken as evidence of these services being engaged in widespread duplication of effort*. Each service has its own important and distinctive functions and identity.

Substantive appointments

We know that the Island does not currently have a Chief Officer of Police, and that the current Deputy Chief Officer is serving in the role on an Acting basis. Indeed, questions have been raised in this Assembly about the wisdom of this situation continuing indefinitely.

Similarly, I am conscious that both the Head of the Customs and Immigration Service and the Chief Fire Officer are not currently permanent appointments and are also acting up in the roles.

I do not want this proposition to be used as an excuse for prolonged uncertainty.

By allowing the Department to continue with the current interim arrangements, there is a detrimental impact upon morale throughout these key services.

At the same time, I do not want to propose that immediate substantive appointments are made, and then risk compromising the work of Scrutiny.

I therefore suggest that new paragraph (d) arrives at an appropriate compromise.

It does not prevent changes being proposed (at any time in the future) under paragraph (c), but ensures that, if no such proposition is brought forward within 6 months, the process for making permanent appointments to all the roles mentioned in paragraph (b) should commence.

Six months should provide sufficient time for Scrutiny to report back on the proposals, and for a case for change to be presented by the Minister (if he is minded to bring such a proposition) and considered by the Assembly.

If such a case is not forthcoming within this timeframe, *Islanders can rightly expect their frontline services to then be led by permanently appointed Officers.*

Wider concerns and reasons for the amendment

Notwithstanding the above, there are some wider concerns which have also contributed to my decision to lodge this amendment.

Budget cuts

I am worried that the merger of services is simply a cover for substantial budget cuts to our essential 'blue light' services.

The Minister has offered reassurances in this respect, and I welcome and am grateful for them.

Yet his reassurances have not prevented a proposal for large cuts in tiers 3 and 4 of the services.

Those cuts contravene the public commitments of the Minister when he said that he was “not looking to reduce numbers any further”, or “looking for any further budget cuts.”

These are further budget cuts, and I am anxious to ensure they are not repeated in other roles and ranks.

Ensuring that the current services and their leadership are maintained will allow JHA to then demonstrate, as part of evidencing the proposals for mergers, that staff numbers will not fall as a consequence.

I think Members require that re-assurance and evidence first, before allowing these reforms to proceed.

Public support

These are essential core services that are valued and trusted by Islanders.

I have no idea if the proposals as published in the structure of 4th February 2019 have the support of the Public. In my view, they are being implemented with virtually no meaningful consultation at all, let alone from the people who matter the most – Islanders who experience the services first hand, every day of the year.

A further advantage of this amendment is that it gives the opportunity for such consultation to take place before these proposals are finalised and then presented for implementation.

It is important to remind the Assembly that the proposals (as currently drafted) do not have the support of the Jersey Police Authority, an organisation which is constituted of members of the Public who give of their service on an honorary basis (as well as 2 States Members).

The speed of change and associated risk

As mentioned above, I am not confident that these services, in whatever structure they exist, can manage in the short to medium term with the proposed loss of capacity in these leadership roles.

The proposed change from the current structure to the new structure is a very significant jump.

If in due course the case for the change is made, and is to be implemented, *it is surely safer for that implementation to take place over the medium term, not within a matter of months.*

This allows for the transfer of knowledge and expertise to take place where required, and greatly reduces the associated risk involved with these extensive changes.

We need to keep in mind that any risk will ultimately have to be borne by the Public.

Jersey's international reputation

Externally, Jersey is regarded as a small country, and our public services should reflect that status.

By way of example, it is not unreasonable to expect that such a jurisdiction should have its own recognisable National Police Force and Customs and Immigration Service. Such Police Forces, for example, exist across the British Isles, including for areas that have significantly less autonomy than Jersey. Similarly, most autonomous jurisdictions have their own distinct Customs and Immigration Service/Border Agency.

Both the Police and Customs are dealing with matters which, if handled poorly, could have a significant detrimental impact on our international reputation and/or economy.

We cannot put our capacity and ability to handle such matters at risk, and by implementing change without being informed of the reasons why that change is beneficial for the Public, that is exactly what we would be doing.

If the current model were to proceed, Jersey's Chief Police Officer would be a tier 3 role; this cannot be appropriate for such an important position.

It would serve to discourage the most talented people to aspire for the position.

Similarly, it would not inspire the respect the role deserves when the incumbent is engaging with their opposite numbers elsewhere in the British Isles and further afield.

The same issue would exist for the Customs and Immigration Service.

Given that, under the proposed structure, it will be almost impossible in practice for the Chief Police Officer to have anything more than a passing knowledge of the work of Customs and Immigration, much of the intricate knowledge for (and leadership of) what remains of the Service will need to be provided by the 'Principal Officer: Borders and Revenue' – a tier 4 post.

There is also a contradiction in that the Head of Law and Border Enforcement role incorporates 3 senior positions (Chief and Deputy Chief Officer of Police, and Head of Customs and Immigration) and yet is less senior than any of those posts as they exist at present.

Independence of States of Jersey Police (“SoJP”)

One critical matter and cause of anxiety is guaranteeing the independence of the States of Jersey Police.

Police independence cannot be placed in any doubt whatsoever and must be clear in both perception and reality.

Regrettably, and worryingly, this is not the case under the current structure.

The continued independence of the Police has been widely questioned, particularly by the Jersey Police Authority and 12 serving civilian officers of the SoJP, all of whom are former Police Officers.

I was also alarmed by a response to a recent written question I asked of the Attorney General in which, when referring to the proposed JHA structure, he stated that *“Adequate safeguards will need to be put in place to ensure that States of Jersey Police operational independence is not compromised, both structurally and in practice.”*

My question had simply asked if the proposed structure might impact in any way on the operational independence of the Police, when compared to the current structure.

The only answers I would have been comfortable with were that there would be no impact, or that operational independence would have been further enhanced.

The matter of guaranteed Police independence must be put beyond all doubt before any changes are implemented.

There need to be several ‘locks’ in guaranteeing and guarding Police independence and, in view of the proposed changes under the Target Operating Model, *I believe one of those now needs to be the approval of this Assembly regarding any changes to the status of our Police Force.*

Some of the proposed remedies responding to the challenges being made to the current structure are *equally alarming*.

One is that Customs and Immigration be given the same level of operational independence as the Police, and have the same requirement to be overseen by the Police Authority.

Whilst this may sound attractive at first glance, it would be unique for a service that is staffed entirely of civil servants who report, for different purposes, to the Lieutenant Governor, Minister for Treasury and Resources, and Minister for Home Affairs.

In addition, I am not certain that the Police Authority, with their total of one full-time staff member, are yet properly resourced to take on any extra responsibilities.

Independent Inspections

Members will be aware that Her Majesty's Inspectorate of Constabulary and Fire and Rescue Services recently undertook a full independent review of the States of Jersey Police; the Report should be published later this year.

I consider it reasonable to expect that the findings and recommendations of that report are taken into account before making any substantial changes to the structure of the Police.

That would not be possible if the proposed JHA structure proceeds and is implemented based on the current timetable.

Before I stood down as Assistant Minister for Home Affairs in June 2018, I had been made aware of a proposal for the Customs and Immigration Service to be inspected by the Independent Chief Inspector of Borders and Immigration. I am unsure whether this has been undertaken or remains as a proposal.

Again, surely the independent views of such a body should be considered before going ahead with implementing any new structure.

Is there a problem that needs addressing?

A question that has occurred to me (and is linked to my request for an evidenced business case outlining the need and rationale behind the proposed reforms in the JHA structure) *is regarding the precise problem that is being addressed through these changes.*

I am not aware at this time of any great concerns around the current structure, performance, or the manner in which the Island is served by the Home Affairs services, although the aforementioned independent reports may inform me otherwise.

There are, of course, always certain issues that need to be addressed, and there is continually room for improvement in service delivery (a principle that applies across the public and private sectors).

Largely, however, I believe that the Island is content with the service it receives from the Police, Customs and Immigration, Fire and Rescue and Ambulance services.

I am not aware of, and do not sense, any appetite for widespread reform.

As I understand it, the main issue appears to be a lack of resources for these services, something which I have raised within the Assembly, but which would not be resolved by the proposed JHA structure. In fact, resourcing is likely to be made worse, both in terms of finances and of manpower.

Support of the Services for the proposed structure

With the above points in mind, I am also not certain that the current proposals even have the support of the Service Heads and Chief Officers, which is deeply concerning.

The Assembly surely needs to be confident that the changes have the support of those whom we trust with the delivery of these frontline services on a day-to-day basis before they can be implemented.

Distinct Services

At the beginning of this report, I stated my concern at the lack of an evidenced business case for these proposed changes.

This concern is heightened because, from my experience (as a former Chairman of the Education and Home Affairs Scrutiny Panel and former Assistant Minister for Home Affairs), *the Home Affairs services are distinct organisations, each providing a vital and unique service to the Public.*

I have always seen the need and potential for co-operation, co-ordination and joint working in appropriate areas, and this is happening to a greater extent than has ever been the case previously.

My deep anxiety is that the proposed assimilations will result in the services having reduced capacity (in terms of expertise and available resources) to manage the very specific areas for which they are responsible.

Take, for example, the Customs and Immigration Service, for which I had delegated responsibility when serving as Assistant Minister.

In the proposed structure, the Service sits under the Group Director of Public Protection and Law Enforcement and the Head of Law Enforcement and Borders; *it appears that the structure views Customs and Immigration as a law enforcement agency which can simply become an arm of the States of Jersey Police Force.*

Customs and Immigration are clearly involved in an element of law enforcement work as Jersey's Border Force (for which they co-ordinate with the Police where necessary), but the proposed structure ignores the broader, non-law enforcement functions of the Service. These include (but are not limited to) the collection of duty and GST, managing the clearance of goods entering the Island, keeping our immigration legislation and rules up-to-date, handling work permit policies and applications, operating the passport office, processing naturalisation applications, considering asylum applications and the legalisation of documents.

To assist Members, I have attached as an **Appendix** a more detailed list of the non-law enforcement aspects of the work of Customs and Immigration.

This is a significant remit in a "business as usual environment". We should also be aware of the additional work, covering many of these areas, which has been imposed or might yet be imposed on the Service as a consequence of Brexit.

There is no question that the States of Jersey Police Force is a law enforcement and public protection agency, and the structure in that respect accommodates their functions.

I question, however, whether the management of these broader responsibilities of Customs and Immigration have been properly considered and accommodated within the new structure.

In my view, the Assembly should ensure the continued existence of a dedicated and recognisable Customs and Immigration Service until such time as it can be given evidenced re-assurances in this respect.

As Assistant Minister, I was also responsible for the Fire and Rescue Service, which is the lead organisation in Jersey for reducing the risk, and consequences, of fire.

The strategy of the Fire Service is set out in their 2017–2020 Integrated Risk Management Plan, which I encourage Members to review prior to the debate.

The vast majority of the work undertaken by the Fire and Rescue Service is done so in accordance with a statutory duty, under either the [Fire and Rescue Service \(Jersey\) Law 2011](#), the [Fire Precautions \(Jersey\) Law 1977](#), the [Petroleum \(Jersey\) Law 1984](#) and/or the [Explosives \(Jersey\) Law 1970](#).

This includes a legislative requirement to respond to non-fire emergencies where members of the Public need to be rescued (either as part of saving their life/preventing them from becoming injured, or preventing damage to property/the environment). *This work is not optional; it is a legal requirement set by the Assembly.*

As we know, the work of the Fire and Rescue Service is often highly specialised.

Take, for example, the Fire Safety Command enforcing the requirements of the fire precautions, petroleum and explosives legislation. This involves the officers being consulted on planning and building applications, providing fire certificates (and/or advice regarding compliance) to houses in multiple occupation, advising on the use and supply of pyrotechnics, and ensuring fuel storage safety standards are upheld and improved. Take also the job of preventing fires and responding to fires or other emergencies where rescue is required (including from water).

These are the roles of trained specialists.

I am not fully conversant with the work of the Ambulance Service, but I find it difficult to identify too many similarities between the Ambulance and Fire and Rescue Services.

I can understand the co-operation there is between them now; if a person has suffered a non-life-threatening injury and requires assistance and assessment, it is reasonable for the Fire Service to send a response to ensure that Ambulance Service staff remain available to deal with life-threatening cases.

Firefighters have sufficient training for this purpose; however, we should not expect a firefighter to respond to someone having a heart attack or stroke, any more than we would expect a paramedic to respond to a fire or give advice under the Fire Precautions (Jersey) Law 1977.

That is not to say that it might not be possible at some point in the future to operate a more combined service, where officers are trained in both firefighting/fire service and paramedic skills.

Such a position is not, however, likely to be realised in Jersey in the foreseeable future. Furthermore, it is surely prudent to train and equip the required number of firefighters/paramedics with the necessary skills before moving towards a combined service, and not the other way around.

I therefore suspect that, as things stand in Jersey at present, whoever might be appointed to the Head of Fire and Ambulance role will find themselves in a position where they are not properly skilled in 50% of the job.

That is not a criticism, rather it is the reality of putting together 2 very different jobs with unique skill sets.

It is, however, a very significant concern as to the potential future resilience of a combined service, and the impact that might have on public safety.

I require more evidence and persuasion as to the logic and benefit of merging Fire and Ambulance, including models from other jurisdictions where this has worked successfully, and details of how a combined service with sufficient numbers of appropriately trained officers can be achieved, before I could comfortably support the proposal.

A way forward

In summary, this amendment allows the Assembly to make it clear that it will not allow our Island's key public services to be subject to fundamental reforms unless it has sufficient evidence to be content that the changes will be advantageous and mitigate the risk to the Public.

It provides a safeguard for the Public, and ensures the proper role of this Assembly is provided for in overseeing and approving significant changes to the Services on which all of us may, at some point in our lives, depend.

Even in view of the concerns that I have set out, many of which I know are shared by my colleagues, this amendment provides the Justice and Home Affairs Department, the Minister for Home Affairs, and the States Assembly, with a manner in which to proceed and make progress.

It gives the Department and the Minister the opportunity to make their detailed and evidenced case for changes that they believe will benefit Islanders, and to demonstrate how that would be achieved.

I have no doubt that, if and when such a case is presented, it will meet with the support of a majority of Members of this Assembly.

I hope Members agree with my concerns and will support these amendments to what is an excellent and important proposition.

**Non-law enforcement responsibilities of the
Jersey Customs and Immigration Service**

Customs

- Answering e-mail and telephone enquiries in relation to the clearance of goods, duty collection and reliefs from duty.
- Drafting the terms and conditions for the various types of Approved Traders who import goods into the Island.
- Collection of Customs/Excise duty and Import GST.
- Processing refunds of duty.
- Updating/developing the CAESAR database.
- Processing import/export of freight.
- Managing the import/export licensing regime.
- Interpreting GST Directions, particularly in relation to reliefs from GST.
- Drafting Directions for Freight Companies regarding the clearance of goods both into and out of the Island.
- Engaging with importers/manufacturers of excise goods.
- Issuing excise production licences to producers/manufacturers of excise goods.
- Trader Compliance visits.
- Approving premises for the storage of goods held under customs control either in bond or otherwise.
- Put forward proposals to the Comptroller of Revenue which allow the relief/drawback of duty.
- Suspend the payment of duty subject to conditions.
- Arranging the sale of uncleared goods under the Customs Law.
- Preparing reports for the Comptroller of Revenue as required, for example on the *de minimis*.
- Processing Community Transit documents.
- Banking revenue that is collected.
- Forecasting yields on a quarterly basis for customs and excise purposes for both current and future years. Draft and present report to the Income Forecasting Group.
- Assisting with the preparation of the annual budget, including issuing instructions for legislative drafting.
- Updating information on the Government of Jersey website as required.
- Review and update Standard Operating Procedures as required.
- Manage matters relating to Brexit.

Immigration

- Identify the relevant sections of the UK Immigration Acts which require extension to Jersey and prepare briefing notes to discuss with the Law Officers' Department.
- Draft changes to the Jersey Immigration Rules in liaison with the Law Officers to ensure that the Island maintains the same standard of control as H.M. Government.
- Undertake full and interim reviews of the Immigration Work Permit Policy. Make proposals for further consideration following research to identify business and industry trends and, where appropriate, consult with other Government Departments.
- Process Naturalisation applications and prepare reports for the Lieutenant Governor.
- Attend meetings at the Home Office to discuss changes to policies and report their potential impact on the Island.
- Prepare drafting briefs for the Legislative Drafting Office in respect of the annual increase in immigration fees.
- Prepare speaking notes for the Minister for Home Affairs in respect of immigration legislation to be debated in the States Assembly.
- Consideration of deportation cases and applications for revocation of a deportation order against a comprehensive framework set out in the Jersey Immigration Rules. Prepare report for the Minister for Home Affairs.
- Consideration of asylum applications against a comprehensive framework set out in the Jersey Immigration Rules for assessing and determining claims for asylum. Prepare reports for the Minister for Home Affairs.
- Process work permit applications against criteria set out in the Immigration Work Permit Policy of the Minister for Home Affairs.
- Deal with representations/appeals made by applicants or other interested parties when an immigration or work permit application has been refused.
- Update/develop the Immigration database.
- Answering e-mails/telephone enquiries in relation to the employment of overseas nationals.
- Review and update Standard Operating Procedures.
- Issue British passports.
- Maintain H.M. Passport Office policy documents and procedural guidelines.
- Together with representatives from the other Crown Dependencies and Gibraltar, attend meetings with H.M. Passport Office on passport matters.
- Updating information on Government of Jersey website as required.
- Reconcile monies collected from immigration, work permit and passport applications.
- Legalisation of Documents.
- Manage matters relating to Brexit.