



Scrutiny Office

## Public Accounts Committee

**THURSDAY, 30th JUNE 2016**

**Panel:**

Deputy A.D. Lewis of St. Helier (Chairman)

Connétable C.H. Taylor of St. John

Deputy J.A. Martin of St. Helier

Mr. R. Parker

Mr. G. Drinkwater

**Witnesses:**

Chief Officer, States of Jersey Police

Chief Officer, Community and Constitutional Affairs

[15:04]

**Deputy A.D. Lewis of St. Helier (Chairman):**

Just for the record, we will just go round the table and introduce ourselves so we get it on Hansard. So, could we start with the Chief Executive of ... I never get your names right.

**Chief Officer, States of Jersey Police:**

I will do that bit for you. **[Laughter]**

**Deputy A.D. Lewis:**

You go ahead, yes.

**Deputy A.D. Lewis:**

Thank you very much for coming along today. This, as you know, is a hearing that we have been conducting across all accounting officers and it is concerning the main expenses and accommodation and travel. We have a question plan which we are going to work through, but I am just going to set the scene, if I may, so that you can understand what it is we want to try and detail here today and I am sure you can be of assistance to us. So, as you know, we are looking here at Financial Direction 5.7 in particular, which lays out the terms for expenditure on travel, including that departments must ensure procedures are in place for capturing any benefits accrued to staff from States travel; preapproval that is required in line with departmental schemes of delegation for all travel, including the purpose of the trip, if it is a fully flexible ticket for a flight or train journey; flights other than economy class or wrapping personal trips around a business trip all need prior approval. The kind of conduct indicates among other things that staff should exercise prudence when planning trips. An employee should ask himself or herself: "Is the action I intend to take legal and does it comply with States policies and approved practices? Does the action feel right? Could it be justified for those outside the States? Could I be compromised in my dealings with others as a result of my intended action?" That is clearly stated in F.D. (Financial Direction) 5.7, which I am sure you have read. We are looking to understand through the Public Accounts review as to whether F.D. 5.7 is fit for purpose. We will focus on value for money and the centralised booking system, which was set up to save money and time and standardise travel and accommodation booking arrangements throughout States departments. We are quite keen to find out your view on the central system. Since P.A.C. launched this review, the Chief Minister asked the Treasurer of the States to commission a review on policies related to travel and the P.A.C. has seen that report, which includes that there was not widespread misuse of procedures but there were some instances of non-compliance. It identified a number of areas where improvements could be made. I assume you have read that report. These include publishing details of all flights and bookings over £500 on a 6-monthly basis and the general tightening of compliance and authorisation processes. We would like to explore those a little bit further and find out more detail about how you process this type of expense. So, we are going to start off with our first theme, which is Financial Directions, the actual 5.7 I spoke about. We will then go on to value for money, and then finally we are going to look at the centralised booking system. So, that is the order of play today. I would also like to just welcome back Gary Drinkwater, who is a lay member of the P.A.C., who has joined us now as well. So, I mentioned the report earlier, the recent report published by the Chief Minister's Department on travel and expenses, and there was an internal auditor's report last year which highlighted issues of non-compliance on Financial Direction 5.7. What we are interested to know is how often is your department ... do you believe it has not complied with Financial Directions and also, that being the case, what has your department done to improve levels of compliance? Can we start with you, Tom?

**Chief Officer, Community and Constitutional Affairs:**

Sure. You ask for specifics. Let me find my specific information to tell you the answer. Ratio of non-compliance for all C.C.A. (Community and Constitutional Affairs) services is one in every 145 bookings, so we have 0.47 per cent of our bookings which are not able to comply and those are documented and recorded. In my department I sign all those off and so I see and know about every one of those instances. Generally, they tend to be things like we had one recently that I signed off for Customs and Immigration because they were going on a training course and the hotel was centrally booked by H.M.R.C. (Her Majesty's Revenue and Customs) in the U.K. (United Kingdom), so we could not use HRG and so I signed off on the fact that that had not been possible to comply with the direction in that instance. They are mostly like that.

**Deputy A.D. Lewis:**

Okay, so very low levels of non-compliance?

**Chief Officer, Community and Constitutional Affairs:**

Very low.

**Chief Officer, States of Jersey Police:**

I have 6 examples, Chairman. I sign off every individual case. Because of the nature of the work we do, we are sometimes involved in international crime inquiries, last minute or family liaison type issues. I can give you details of all 6 before me. I recall signing them all off. Things like an urgent flight required needed to travel at short notice for investigative purposes. If it is outside office hours, that just has to be done. That was to Southampton, I think, so it was not a big ... it is generally to the U.K., National Crime Agency type investigations when we are dealing with organised crime groups, particularly in relation to drugs importation.

**Deputy A.D. Lewis:**

Okay. Obviously, presumably, some of your cost of travel is covered by court and case costs, would that be right?

**Chief Officer, States of Jersey Police:**

Yes, depending on the nature, but that is a ...

**Deputy A.D. Lewis:**

So it could be?

**Chief Officer, States of Jersey Police:**

Yes, and I think you will find on our bigger list a family liaison officer travelled to the Far East in relation to a recent highly publicised murder where, in fact, that was funded from criminal injuries ... no, the C ...

**Chief Officer, Community and Constitutional Affairs:**

Criminal offences compensation fund.

**Deputy A.D. Lewis:**

Compensation fund, yes.

**Chief Officer, States of Jersey Police:**

Compensation fund. They have a special budget head.

**Deputy A.D. Lewis:**

So it is not actually your money sometimes, it is from another fund?

**Chief Officer, States of Jersey Police:**

Well, I still account for it but it does not always necessarily come from my budget. In terms of my budget, my complete budget for travel subs and hotel accommodation varies between ... I think the lowest in my tenure has been 0.6 to 1.2 per cent of my overall budget, roundabout a quarter of a million.

**Deputy A.D. Lewis:**

Okay. So the fact that sometimes this money is not yours, you are still confident ...

**Chief Officer, States of Jersey Police:**

I still account for it.

**Deputy A.D. Lewis:**

... you are following the normal accounting procedures, following Financial Directions and the Code of Conduct, despite the fact that it is not actually your money?

**Chief Officer, States of Jersey Police:**

Absolutely. It might be a phone call and I will say: "Just go ahead" because, you know, it is impractical to do things otherwise, you know, so ... But I know where my people are and why they are going.

**Chief Officer, Community and Constitutional Affairs:**

Something like the criminal offences compensation fund, an application will be made into the fund for something, which might involve travel for police purposes, and then that money will be transferred across to fall under, in this case, the Chief of Police and Accounting Officer responsibilities. So it never sits outside of an accounting officer's responsibility, it just stays in the fund until it is transferred for a purpose. As soon as it is transferred for a purpose, it is transferred to someone.

**Mr. R. Parker:**

For clarification purposes, you said it was outside of office hours so ...

**Chief Officer, States of Jersey Police:**

That is just one example.

**Mr. R. Parker:**

If it is outside of office hours, there is someone at HRG that you can phone up or are they only available ...?

**Chief Officer, States of Jersey Police:**

In that case, it was a quick: "Can you get a detective over here now?" I cannot go into the details of why they were going, but I know where they were going and it was ... we are talking somewhere between £100 and £200.

**Deputy A.D. Lewis:**

Yes. You can make those bookings on the HRG system directly anyway, you do not have to phone them for that so ...

**Chief Officer, States of Jersey Police:**

Sometimes the exigencies of investigating offences ... very rare, as I say, I only have 6 here listed in all of my time, and I was personally involved in signing off the next day by the officer who originally authorised it. Generally, a detective sergeant comes and explains to me why the rules were surpassed.

**Chief Officer, Community and Constitutional Affairs:**

I occasionally have those on things like customs and immigration as well, you know, where at that time early in the morning when someone just needs to be booked ready to move at 7.00 a.m., the people who are trained to use the HRG system are tucked up asleep at home and so quite often the officer knows how to book themselves a ticket. They might not be all trained, every single

frontline officer who needs to, but they know how to get themselves there. Generally, the rule is just go with what needs to be done operationally and then we will worry about that afterwards. They are very rare, but when the officer needs to go, the officer just needs to go.

**Chief Officer, States of Jersey Police:**

Exceptionally, in another case: "Hotel used for accommodation was where the attended conference was held. Rates obtained were half the normal rates due to the reduced conference rates", which obviously HRG would not necessarily have access to. So that made absolute sense to do that because it halved the room rate.

**Deputy A.D. Lewis:**

Sure, yes. Okay. Moving on then, Gary, do you want to ...?

**Mr. G. Drinkwater:**

I think we understand the system now, but we have noticed that in some areas questions we have raised is who signs off the Chief Officer's travel and expenses. So we have a senior person. Are they typically signing off their own expenses? Because that was one of the things that was probably not compliant from the C.A.G.'s (Comptroller and Auditor General) report.

[15:15]

**Chief Officer, States of Jersey Police:**

The furthest I have been in 5 and a half years is Manchester, before that Gatwick, and frankly I am not going to bother John Richardson for that, so I get my Deputy to sign mine off because I have never been further than Manchester, EasyJet. I have never spent more than £200 on any travel personally in 5 and a half years.

**Mr. G. Drinkwater:**

Okay.

**Chief Officer, Community and Constitutional Affairs:**

I have been to Guernsey once **[Laughter]** since I have been in this job, and John Richardson did sign my form.

**Chief Officer, States of Jersey Police:**

The point is if I were to go to, say, America for an F.B.I. (Federal Bureau of Investigation) conference or something, which I am not going to, I would clearly go to John in that case and say:

“This is transatlantic, it is whatever it is, will you sign it off for me?” But I am not going to trouble him for a trip to Manchester.

**Deputy A.D. Lewis:**

Would you have done that before this directive came out that that is now what you have to do?

**Chief Officer, States of Jersey Police:**

Of course I would, yes, absolutely.

**Deputy A.D. Lewis:**

Yes. It is interesting that you should say that ...

**Chief Officer, States of Jersey Police:**

The rules here are very similar to my former role as commissioner in the City of London Police: 6 hours, the expectation was you would always go economy; if it is beyond 6 hours, then you could probably upgrade to Virgin Premier Plus or whatever. But no, the rules are very similar to the City of London and my policy has not changed from when I was commissioner there to chief here.

**Deputy A.D. Lewis:**

So despite the policy not being in place at that time, that sort of travel you would gain approval from somebody above you?

**Chief Officer, States of Jersey Police:**

It makes sense.

**Deputy A.D. Lewis:**

You would have done it anyway, is that what you are saying?

**Chief Officer, States of Jersey Police:**

Yes. The policy, and I have read it in some detail - frankly, I had not read it in detail before this - troubles me not because I have lived within the spirit of it for years and years.

**Deputy A.D. Lewis:**

You were doing it anyway, yes, okay.

**Chief Officer, Community and Constitutional Affairs:**

There is something that has changed on my side in that in the past I would not have necessarily expected to sign off travel from the heads of service, prison governor, the chief fire officer and the

head of customs, but since the review I do now. So the chief fire officer is travelling shortly to the U.K. for a training event and I have just signed his form this morning. So that is new and I do that mostly because I wish to protect the chief fire officer. I have absolutely no doubt that his judgment is sound and that his travels to and from the U.K. are highly economical and very sensible and all done via the system, but now I feel that he is exposed if I do not do that. So I review and I look at his form and I sign it.

**Chief Officer, States of Jersey Police:**

I must say, Chairman, you have to take this as a whole. If you have a mature, trusted organisation and I devolve all of my budgets to my service heads, whether it is travel, overtime or anything else, I trust them to spend it wisely because they understand as Accounting Officer I could end up ... if I overspend at the end of the year or they .. I'm vicariously responsible for them. It would be difficult to have one aspect of a fairly complex budget where I am looking over their shoulder and crossing every "t" and dotting every "i" whereas on the others I trust them to comply, and I do trust them.

**Deputy A.D. Lewis:**

Okay. The remark you made earlier, though, that you would have done that anyway, you would have sought higher authority for approval of your travel if it would have been a large expense ...

**Chief Officer, States of Jersey Police:**

If it had been a big one, yes, absolutely.

**Deputy A.D. Lewis:**

... yes, that is only something which the Chief Executive has introduced recently, which you are now complying with even at a lower level. You all sit on the Corporate Management Board; you sit there as well, Mike, yes.

**Chief Officer, States of Jersey Police:**

Yes.

**Deputy A.D. Lewis:**

When this was going on, did you not flag that up and say: "Hang on a minute, surely good practice would be to do this anyway, that a senior officer that is spending £5,000 on a flight should not be signing it off himself because that is the level of compliance I have been used to"? Did that ever cross your mind or did it ever come up at Corporate Management Board?

**Chief Officer, Community and Constitutional Affairs:**

I must admit it did not cross my mind in advance simply because my background is, as you may be aware, with the U.K. senior civil service and in the U.K. system when I was in it, all senior civil servants were trusted to sign off on their own travel and have been for many decades and so ...

**Deputy A.D. Lewis:**

That would have normally been quite a low level cost, though, train tickets, that sort of thing?

**Chief Officer, Community and Constitutional Affairs:**

No. I mean, in the U.K. senior civil service when I was in charge of dealing with international matters in the Department of Business, I would sign off on my own travel bookings to Canada, China, all round the world. That was the system at the time. It may well have changed now, but at the time it was a trust-based system. So, senior civil servants would also sign off on their own expenses. So, a U.K. senior civil servant would prepare their expenses claim and sign it themselves and at the time there was no requirement for countersigning.

**Deputy A.D. Lewis:**

You are saying in the police service it was different?

**Chief Officer, States of Jersey Police:**

Well, I never got anyone to sign mine when I was a commissioner and I did have some international travel then because I was the national lead for economic crime and went to the States and the Far East a few times. But I would always still have shown my police authority: "I am off next week, I am going to ..." wherever it is, New York, really on the basis that legally I needed to hand over authority to my deputy because I was not in London but not because I needed anyone to check my travel. But I was still accountable for a budget at the end of the year when ...

**Deputy A.D. Lewis:**

Yes, that is what I thought. I thought I heard you say earlier that you as a matter of course would ask somebody more senior than you ...

**Chief Officer, States of Jersey Police:**

Or maybe I am just a cautious individual. I would just personally, not because of policy, say so but I am ...

**Deputy A.D. Lewis:**

A good policy in your mind?

**Chief Officer, States of Jersey Police:**

It is just a personal thing. I would do it as a matter of course.

**Deputy A.D. Lewis:**

That is good. Robert?

**Mr. R. Parker:**

Tom, does your department use fully flexible tickets?

**Chief Officer, Community and Constitutional Affairs:**

No. I am trying to think whether we have any routine practice. No, I cannot think of any. Prison service, no; customs, no. We have some special travel around deportation that is different to routine, but that is not the question you are asking, really. You are asking about whether just for routine training events in Gatwick the staff would use fully flexible tickets. No, I do not believe that they would. Fire service, no, it is training events. I mean, the bulk of the ... nearly all of the travel other than deportations is for training, so either fire, prison or customs, so it is on a known date, it is a known event, so it is normally pre-booked.

**Mr. R. Parker:**

Has this caused the department any problems, you know, due to changed times or dates of travel?

**Chief Officer, Community and Constitutional Affairs:**

Not that I am aware of.

**Mr. R. Parker:**

Mike?

**Chief Officer, States of Jersey Police:**

No, I just hope I get the best deal when we book travel. There is no need for ... it is difficult to say, really, because if there is a particular investigation where we do not know when we are coming back or when a witness may be available, I would probably, but I cannot think of an example. You know, we just have a general philosophy in the police that we spend public money as if it were our own and we would not spend anything more in using public money than we would if we were buying it ourselves. For example, if I take a train from Gatwick to London, I do not use the Gatwick Express because it is twice the price of First Capital Connect and it is the same time, so I use First Capital Connect, which is £9.90 as opposed to £29. I have an Oyster card - and I have never used a taxi - which tops up automatically. If I go below £10 it tops up to £40. I have a job Oyster card and I have a personal Oyster card. One for work, one is personal.

**Chief Officer, Community and Constitutional Affairs:**

I do that as well.

**Deputy A.D. Lewis:**

You have both worked in the public sector in the U.K. in recent years so maybe there is a moral in that.

**Mr. R. Parker:**

Is there any structure related to travel insurance so if there are any complications that members of your staff are protected or ...?

**Chief Officer, States of Jersey Police:**

Well, there is a group policy, is there not, but ...

**Deputy A.D. Lewis:**

Nobody seems to know what the group policy is, though. What is your understanding of the group policy?

**Chief Officer, States of Jersey Police:**

Well, I only ask about the group policy if I think there are exceptional things. So, for example, the F.L.O. (family liaison officer) who went to Ko Samui I think 4 or 5 times for the investigation and trial of the young boy who was murdered, I just wanted to make sure that they were fully covered for their personal possessions. I remember asking the question; what the answer was I do not know, but we do have a group ... yes, my line would be if we are not, then I out of my own budget will top it up. So, you know, it was just a passing comment, really.

**Deputy A.D. Lewis:**

What was your understanding, both of you, of what the group policy for travel insurance is?

**Chief Officer, Community and Constitutional Affairs:**

I have never personally examined the group travel insurance policy so the parameters of that policy are ...

**Chief Officer, States of Jersey Police:**

Chairman, I hope you are not about to tell us we do not have one.

**Deputy A.D. Lewis:**

Well, some of your other colleagues felt that it did not cover very much and it was not like a traditional travel insurance. I have a travel insurance for business that covers most things.

**Chief Officer, States of Jersey Police:**

I do not think it does, no, but it is the basics.

**Deputy A.D. Lewis:**

But if you are sending people away, do you not think you should know how they are covered? I know when you went to Ko Samui you checked it, but for ordinary travel do you not think that that is something you should be aware of, how your staff are covered?

**Chief Officer, Community and Constitutional Affairs:**

You have seen the lists, Mike, staff travel. A very small number of them travel on a very small number of occasions to central London and back for training. Proportionately, perhaps I could have gone down to the treasury and read the intimate details of the insurance document, but I have not. I mean, travel is less than 1 per cent of my budget and it is very specific so ... I may well give myself an action to do that if you think that would be prudent, Chair.

**Deputy A.D. Lewis:**

Well, it might be seeing as you have gone to Johannesburg, Ko Samui, Lisbon, Barbados, Los Angeles.

**Chief Officer, Community and Constitutional Affairs:**

No, I ...

**Deputy A.D. Lewis:**

Not you but your department, and Nairobi, Washington, Lima.

**Chief Officer, Community and Constitutional Affairs:**

Can I stop you there? My department has deported people.

**Deputy A.D. Lewis:**

Right, okay. Well, whatever the ... these are all deportation costs?

**Chief Officer, States of Jersey Police:**

Some of them are.

**Chief Officer, Community and Constitutional Affairs:**

Some of them are, yes.

**Deputy A.D. Lewis:**

Or was there a member of staff going with them?

**Chief Officer, Community and Constitutional Affairs:**

Do you want to read the list of exotic locations; I will tell you which ones are deportations.

**Deputy A.D. Lewis:**

Okay. When a deportation occurs, does an officer go with them?

**Chief Officer, Community and Constitutional Affairs:**

Sometimes, it depends on the requirements of the ...

**Deputy A.D. Lewis:**

Yes, so that is what I mean. That is what I am talking about, really, is if your officer is travelling to an exotic place, obviously insurance is probably quite important.

**Chief Officer, States of Jersey Police:**

Well, there is an insurance ... there is a group policy ...

**Deputy A.D. Lewis:**

You do not know what it is.

**Chief Officer, States of Jersey Police:**

... but I have never read the finer details. I would assume it covers medical costs and if it does not cover personal possessions, well then ...

**Deputy A.D. Lewis:**

Like I say, the previous officers did not seem to know what it covered so I was just curious as to what your understanding was, that is all.

**Chief Officer, States of Jersey Police:**

I would be hard pressed to tell you what my personal one covers. It changes with regularity and it gets less and less as the years go by.

**Deputy A.D. Lewis:**

When I go away I do check the policy, but anyway, we will leave it there.

**Chief Officer, Community and Constitutional Affairs:**

It is a travel insurance policy. It exists. I assume that it does what it is supposed to. I guess it if does not then ...

**Deputy A.D. Lewis:**

Okay, it is just that the previous 2 officers did not think it did, so I was just curious to know what your understanding of it was, that was all.

**Chief Officer, Community and Constitutional Affairs:**

Yes. Well, they might have more travel and, therefore, maybe ...

**Chief Officer, States of Jersey Police:**

Well, for clarity, there is a ...

**Deputy A.D. Lewis:**

The fact is they did have more travel; they still did not know what the policy was.

**Chief Officer, States of Jersey Police:**

There is a group policy and it covers most things, but I do not think it has all the bells and whistles for ski trips or personal possessions above £500, that sort of thing. You know, with the best will in the world, I am not going to sit there and go through that line by line. If I am going myself I might have a look, but it does not ... I am not taking an expensive camera on a work trip.

**Mr. G. Drinkwater:**

I think one of the questions was someone not getting service or whether 2 officers could travel at the same time. Potentially one would be uninsured if something happened. It is that type of ... on a group policy you look and just be aware and in some possibilities you might not be covered. That was the question that one of them had raised. It is fine.

**Chief Officer, States of Jersey Police:**

But if we have a procurement arrangement with a travel supplier, well then, does the procurement arrangement not include ... would they not raise an alarm bell saying: "Do you realise that your 2 officers are going and only one of them is covered?"

**Mr. G. Drinkwater:**

I do not think it does ...

**Chief Officer, States of Jersey Police:**

I do not have the time to go through everyone's policy whenever they travel.

**Mr. R. Parker:**

I think the argument, the actual thing that is coming back, is related to taking fully flexible tickets and in relation to the amount that had been saved by taking those.

**Chief Officer, States of Jersey Police:**

Oh, I see.

**Mr. R. Parker:**

That is why ...

**Chief Officer, States of Jersey Police:**

In that case, it is academic because I do not think I have ever booked a fully flexible ticket for any of my people.

**Deputy A.D. Lewis:**

Yes, but it came up last time because we were talking about being able to reclaim if you did not take the ticket and it was not fully flexible ...

**Deputy J.A. Martin:**

Yes, cancellation insurance.

**Deputy A.D. Lewis:**

... and you have cancellation insurance, but then that is what flagged up the fact that the guys did not actually know what the policy covered anyway, least of all whether it covered cancellation. So that is why it has come up.

**Chief Officer, States of Jersey Police:**

Well, to go back to your first question, I have had no fully flexible travel for any of my officers in 5 years. I cannot think of a reason for doing it.

**Deputy A.D. Lewis:**

Yes, I cannot see with your list of your places and the reason why you are going why you would to anyway.

**Chief Officer, States of Jersey Police:**

No.

**Deputy A.D. Lewis:**

So, that is fine. Okay.

**Chief Officer, States of Jersey Police:**

So I now understand the context.

**Deputy A.D. Lewis:**

Okay. Gary?

**Mr. G. Drinkwater:**

Yes. We have heard a lot about the Code of Conduct, which is in there. It is a pretty grey area and it is open to interpretation. I think we have seen evidence from the C.A.G.'s report that the Code of Conduct may well have been broken and I think in one case there is an issue that it has. I think one of you mentioned that there were some minor breaches of Code of Conduct. Do you think the Code of Conduct covers everything that it needs to? Should it be more ... should it have more detail in it or is it just something that the staff understand and drill down? What we were saying is are there examples where a member of staff has come up to you on a fairly regular basis and said: "Look, you know what, I do not think I should be travelling" or: "This cost looks ..."? So through this process we are trying to show evidence to the public there is an internal system that looks and that people do not just go and book the most ... you know, and they do question it internally at various levels. So I have heard from the police that they definitely do this.

**Chief Officer, Community and Constitutional Affairs:**

Is this the Code of Conduct for public servants?

**Mr. G. Drinkwater:**

Yes.

**Chief Officer, Community and Constitutional Affairs:**

I just want to clarify I am not aware of any minor breaches of the Code of Conduct for public servants.

**Chief Officer, States of Jersey Police:**

No, neither am I. I was just going to take you up on that.

**Chief Officer, Community and Constitutional Affairs:**

I am aware of minor examples where we have not been able to comply with a Financial Direction and I have documented why, but I am not aware of any breaches of the Code of Conduct.

**Chief Officer, States of Jersey Police:**

Yes, that is what I was going to note, yes, absolutely, no breach of the Code of Conduct. We have a force policy which is drawn down from the Financial Directive for general consumption for all staff and from that we have a travel authorisation form which everyone, including me, has to fill in no matter how big or short the journey is, which in fact has been upgraded in the last few months as a consequence of recent events which reinforces flight duration of more than 6 hours, so it is a precis version of the recent circular, which everyone has to complete. They are mainly signed off by their department heads and anything beyond Europe or over £1,000, including accommodation, comes to me to sign off.

**Mr. G. Drinkwater:**

Good, thank you.

**Deputy A.D. Lewis:**

Sounds good. Judy, did you want to follow up with ...?

[15:30]

**Deputy J.A. Martin:**

Do you feel the Financial Directions relating to travel and expenses are fit for purpose or would you like to see them improved? Do you have any recommendations how this could be done?

**Chief Officer, States of Jersey Police:**

Well, they were written in December 2013 so maybe in the light of recent events they might need a fresh view. I have read them. They are quite straightforward. Very detailed but straightforward.

**Deputy A.D. Lewis:**

Okay. As far as you are concerned, when you make bookings you comply with things like booking in advance whenever you possibly can?

**Chief Officer, States of Jersey Police:**

Yes.

**Deputy A.D. Lewis:**

I appreciate in your job, Mike, it is more difficult. But if there are minor breaches - and it sounds like your department is exemplary by the sounds of things - do you impose any sanctions on the staff or do you encourage them to take some extra training so they do not do it again? How would it work?

**Chief Officer, States of Jersey Police:**

Mine are subject to a specific police disciplinary code.

**Deputy A.D. Lewis:**

It is, right.

**Chief Officer, States of Jersey Police:**

Any breach of the Code of Conduct, which I can assure there have not been during my tenure, they would be subject to internal police discipline, which is a whole raft of sanctions up to dismissal from the service.

**Deputy A.D. Lewis:**

Right.

**Chief Officer, Community and Constitutional Affairs:**

Again, 2 different things. Any breach of the public sector Code of Conduct I would take very seriously in any of the services in my department. Where we have had minor instances of an inability to comply with a Financial Direction ... so, for example, the one I was giving you about a training course where the customs officer stayed in a hotel that was centrally booked by H.M.R.C. so was not able to book their hotel through HRG.

**Deputy A.D. Lewis:**

So it is hardly a breach, it is a ...

**Chief Officer, Community and Constitutional Affairs:**

Then that is, you know, recorded as an inability to comply.

**Deputy A.D. Lewis:**

It is an exception.

**Chief Officer, Community and Constitutional Affairs:**

But it is not a disciplinary matter.

**Deputy A.D. Lewis:**

No.

**Chief Officer, Community and Constitutional Affairs:**

It has to be recorded because it is not in accordance with the Financial Direction.

**Deputy A.D. Lewis:**

So as far as you are concerned you never got to that point? The whole system is working for you so you have not had to get to that point?

**Chief Officer, Community and Constitutional Affairs:**

No, I have not had an instance.

**Chief Officer, States of Jersey Police:**

No.

**Deputy A.D. Lewis:**

Okay. We will now go on to the next topic, which is about value for money. Judy?

**Deputy J.A. Martin:**

Chris is going to take this.

**The Connétable of St. John:**

The internal review that is being carried out identified specific risks that officers may select flights to earn personal Avios points. Have you seen any evidence of this in your department?

**Chief Officer, States of Jersey Police:**

Stunned that that was an issue. It would not cross my mind that anyone would do that. I have asked in the past where do they all go, is there a central pot somewhere, which recently I found out there is. We can phone up procurement and say: "We have an international flight. Is there any advantage? Can we book some points?" You know, this is a business trip. But I am stunned that there was even a facility to be able to do that. I have never personally really understood the difference between Avios points and air miles but I would not ... no, to answer your question, absolutely no evidence of that whatsoever.

**The Connétable of St. John:**

Thank you.

**Deputy A.D. Lewis:**

There are corporate points that the centre collects and then Avios points that the individual collects at the same time. So you are probably missing out on some free holidays here, Mike, but do not worry. **[Laughter]**

**Chief Officer, States of Jersey Police:**

What worries me ...

**Deputy A.D. Lewis:**

The reason for the question ...

**Chief Officer, States of Jersey Police:**

... is can you unwittingly accrue these points without knowing it? That is a question I have asked of the Auditor General.

**Deputy A.D. Lewis:**

That is what we found out today.

**Chief Officer, States of Jersey Police:**

Can you unwittingly ... I do not think you can unwittingly accrue them.

**Deputy A.D. Lewis:**

No, you can if you have a card.

**Chief Officer, States of Jersey Police:**

So if I have a B.A. (British Airways) gold card for Mike Bowron ...

**Deputy A.D. Lewis:**

Well, I do not think you would get to there, Mike, with your trips to Manchester but anyway ...

**Chief Officer, States of Jersey Police:**

No, but if I had a personal one and then I book through the proper means a trip to America, does my name come up on some B.A. database and they then transfer points to my personal account?

**Deputy A.D. Lewis:**

Yes, it does, yes.

**Chief Officer, States of Jersey Police:**

Okay. Well, it does not because I do not have a gold card or a silver card, but I am amazed that that can even happen.

**Deputy A.D. Lewis:**

It does and it came out in the earlier hearing that that is exactly what does happen. So even though, say, members of staff do not want to receive those points, they have to receive them because the system says ...

**Chief Officer, States of Jersey Police:**

Then there is a structural fault in the system that needs to be addressed.

**Deputy A.D. Lewis:**

There is and that is what was identified earlier on.

**Chief Officer, States of Jersey Police:**

If it is any implication that anyone is accruing a favour from their work, then that would be wholly wrong if they did not ... I mean, if that happened to me I would be none the wiser, would not even know what to do with Avios points.

**Mr. R. Parker:**

The other thing about it is that there is ... the way the system works for the airline is that obviously it is tied in, it is a loyalty scheme, and you have to obviously achieve so many flights a year to be able to maintain your privileges. So, for instance, if you want to maintain a gold card, you have to do so many flights and usually that includes obviously international.

**Chief Officer, States of Jersey Police:**

That is why my wife gets one because she books all my personal flights and she accrues all the benefits and I do not.

**Deputy A.D. Lewis:**

The reason why we asked the question was because there has been instances where a lot of points have been accrued. The interesting comment that you have made is you were not aware that you could redeem the points for your own department's benefit. Perhaps it is a ...

**Chief Officer, States of Jersey Police:**

I was until up to a few weeks ago, yes.

**Deputy A.D. Lewis:**

You are now, yes, exactly, yes. There are 1.5 million points there, by the way, so that is over £100,000.

**Chief Officer, States of Jersey Police:**

That implies that not many people in the States know.

**Deputy A.D. Lewis:**

I am not sure how you account for that but in your budget there might be some free money there for you.

**Mr. R. Parker:**

Thank you for the tip, Mr. Chairman.

**Deputy A.D. Lewis:**

You are welcome.

**Chief Officer, States of Jersey Police:**

But that does imply that not many people know that.

**Deputy A.D. Lewis:**

Yes. They do not and that is why they have not been briefed about that. There has been no redemptions.

**Chief Officer, States of Jersey Police:**

Yes. They ought to be because we can ... I am sure that other departments could bring that pot down and save some money.

**Deputy A.D. Lewis:**

They could, yes. There has been no redemptions since last July, you might all be interested to know as well.

**Chief Officer, States of Jersey Police:**

What we do not know we do not know.

**Deputy A.D. Lewis:**

Now you know, I would get in there. Okay. Right, moving on then, Judy, do you want to carry on ...

**Deputy J.A. Martin:**

No.

**Mr. R. Parker:**

The next question is not relevant. It is not relevant and that is why we said that.

**Deputy A.D. Lewis:**

Yes. Moving straight on to the centralised booking system that we spoke about earlier. Do you use the system yourselves physically?

**Chief Officer, Community and Constitutional Affairs:**

No.

**Deputy A.D. Lewis:**

Have you ever tested it?

**Chief Officer, Community and Constitutional Affairs:**

No.

**Deputy A.D. Lewis:**

Are you aware of complaints about the system and you would presumably have staff that use it?

**Chief Officer, States of Jersey Police:**

Sometimes there might be a grumbling but I do not know more than that.

**Deputy A.D. Lewis:**

Okay. Tom, are they grumbling?

**Chief Officer, Community and Constitutional Affairs:**

Yes, I mean occasionally I hear in the background staff grumbling about something they can or cannot do on the H.R.G. (Hogg Robinson Group) system but generally they seem to ...

**Deputy A.D. Lewis:**

On the basis of that, are you not curious to find out what they are grumbling about? Because you can log on as a user and try it yourself because it looks, on the face of it, like any other web system until you start using it. I would highly recommend to you, as accounting officers, to go on there and try and use it. I would be very interested in your views and you could perhaps then share that with your staff that do use it, just a suggestion.

**Chief Officer, States of Jersey Police:**

You are putting us in a difficult position here because we take Cabinet responsibility for corporate decisions at C.M.B. (Corporate Management Board) and elsewhere when the Treasury bring a system. I understand the benefits of procurement, which sometimes individuals do not see. In the overall scheme of things procurement should bring a reduction in costs to a range of departments and it almost certainly does. But there will be individual cases along that route where people say: "I could have done that myself on my laptop and gone EasyJet" or whatever. But for the greater good we have a procurement arrangement and it should, by and large, produce savings across all departments of the States of Jersey. If it does not it is for Auditor General and others to look at.

**Deputy A.D. Lewis:**

Okay. Have you heard this matter brought up at the Corporate Management Board?

**Chief Officer, Community and Constitutional Affairs:**

About the H.R.G. system, yes. The H.R.G. system has been discussed at Corporate Management Board.

**Deputy A.D. Lewis:**

In a positive or negative way?

**Chief Officer, Community and Constitutional Affairs:**

Both probably. Generally, what I have heard about the H.R.G. system is that on the one hand there are benefits in terms of centralised procurement and benefits around being able to get a complete picture across the organisation of what is happening. Then, on the other hand, there are some frustrations about whether you are always getting the cheapest and best value for money as a result of the rules built into the system or whether the system will always allow you to do what you are trying to achieve as a public servant. I hear both and I think that whenever it is being discussed at C.M.B. both points of view have been raised.

**Mr. R. Parker:**

Has anybody questioned the issue that you end up with part of the expenditure goes through H.R.G., part goes through credit card, going out as expenses. Therefore, seeing the whole picture, how is that put together? Do you get a report showing the total expenses by trip, including those that have gone through the credit card? Is that linked via a travel thing or do you just see an H.R.G. report and a JD Edwards report that someone sent? How do you see that?

**Chief Officer, States of Jersey Police:**

They are not all reconciled on one spreadsheet because of the infrequency of travelling it is quite easy to identify ... I do everything, I look ... At every Diamond Group, which are held once a week, we go through overtime, individual use of overtime, travel, conferences. Nobody can go and look ... I have also a bit of a bee in my bonnet about conferences generally and you find out that 2 people went to the same conference. We now have a conference panel but nobody goes to the conference unless the panel have judged that it is worth doing, only one person is going to go and when they come back they report to their colleagues who get value for money and the benefit of going. That is just a general thing in public service I think that you just tend to find people who like going to conferences. But we have a mechanism where you do not, it is governed and controlled. As head of my organisation I know who is going where, why and what the benefit is, not just for travel, for everything.

**Deputy A.D. Lewis:**

Do you share that view across the Corporate Management Board because I have evidence here of the department has sent 3 and 4 people to the same conference? Perhaps that is something you might want to share with your colleagues.

**Chief Officer, States of Jersey Police:**

I do not want to be seen as a goody two-shoes, that is just how I do my own ...

**Deputy A.D. Lewis:**

No, no, not goody two-shoes, it is good sharing of practice, rather than working in silence and that is what I thought the Corporate Management Board was about.

**Chief Officer, States of Jersey Police:**

Yes.

**Chief Officer, Community and Constitutional Affairs:**

In terms of your question with the follow-on information that was asked for, now I have that spreadsheet in front of me, purchase cards, hotels booked by H.R.G. and flights, I have to say it

has not told me anything that I did not already know but that is probably because that is one trip from the Fire and Rescue Service and 6 trips by the Field Squadron to training and 4 or 5 deportations, all of which I knew about. Some Customs and Immigration dog search officers spending time in Gatwick, doing their training in Gatwick, which I knew all about. I think the value might be different in different departments. I think if you have a department where there is a lot of purchase-card transactions that are travel related, a lot of flights and there is then I think ...

**Mr. R. Parker:**

I was trying to work out and reconcile, how was the benefit related to the centralised procurement if you ended up with 2 systems and you were looking at, say, transparency related to costs? In effect, if you had full transparency and you had a much simplified system there could be a real benefit in that, which would reduce maybe some of the administration within the department.

**Chief Officer, Community and Constitutional Affairs:**

If you are going to tell me that the cost of achieving that would be £70,000 for me, I would say I do not have £70,000 to spend on something more worthwhile for the good of the Island because, as you can see from this little sheet, it is not difficult for me to gain that view. That would not be a worthwhile investment but I can see how, for the organisation, where you might have sections of the public service that have to do a lot more travel than it could be. But I can only answer it from my perspective.

**Chief Officer, States of Jersey Police:**

I am the same and I cannot compare my organisation with health. You might have a conference on health where you have consultants going to it, it is difficult to compare, it is like an apple and an orange. I can tell you every single trip by all of my officers and staff over the last 5 and a half years beyond Europe. I can remember why they went, what the benefit was and roughly, within about £100, how much it cost, every trip for the last 5 and a half years and I can count them on 2 hands.

**Deputy A.D. Lewis:**

The system we were speaking about here, the reason why you have a corporate management system like this, which you had alluded to, Mike, earlier on, is it is there for corporate reasons. It is there to save money, it is there to save time, it is there to give you an audit trail. Our investigations revealed it does not seem to be saving any time, it does not seem to be saving any money and it does not leave a very good audit trail. We are just really questioning whether the system is really working that well, so that is why we are interested in your experience of it. One of the things that they will do is give you a promise of best price. If you get a fare back from the system that you think, this looks a bit high, do you go back to them and challenge them? How often have you done

that and said: "The system says this price, I have done this myself and I have a better price"?  
Have you ever gone back to them and have they come back to you with a ...

**Chief Officer, States of Jersey Police:**

Yes, and in fairness they will go off and try and pursue the one you identified.

**Deputy A.D. Lewis:**

Right. How often does that happen though?

**Chief Officer, States of Jersey Police:**

It is infrequent, I do not have that many trips.

**Deputy A.D. Lewis:**

Right, okay.

**Chief Officer, States of Jersey Police:**

Anyway, it is not worth the effort to argue the toss over £30 on a flight to Bristol.

**Deputy A.D. Lewis:**

No, no, no. But we have evidence that a flight to Bristol here, you will be staggered at this, has cost nearly £600.

**Chief Officer, States of Jersey Police:**

I could probably ...

**Chief Officer, Community and Constitutional Affairs:**

But, again, I think ...

**Deputy A.D. Lewis:**

It is not one of yours, by the way, so do not worry.

**Chief Officer, Community and Constitutional Affairs:**

I think the difficulty that we are perhaps having in assisting P.A.C. today is that they are literally ... the trips are a handful and I suppose ...

**Deputy A.D. Lewis:**

That is why it is interesting to have a contrast here. We had, previously, 2 departments that travel a lot, so this is why this is very interesting and that is why we have done them like this. There are lessons to be learned from both.

**Chief Officer, Community and Constitutional Affairs:**

Yes, yes. I guess if you almost know every single incidence, which you can see we do, then the value that systems bring to some of that is perhaps not as strong as when you are having to get good ...

**Deputy A.D. Lewis:**

But even if you were doing multiple trips, let us say you had a major investigation going on and you were doing multiple trips, it sounds to me that your good practice and your interpretation of codes of conduct and directions is exemplary, if you do not mind me saying.

**Chief Officer, States of Jersey Police:**

Thank you.

**Deputy A.D. Lewis:**

I do not think you would be before us in the way others have, sitting there and feeling uncomfortable.

**Chief Officer, States of Jersey Police:**

I was a little worried as to why I was before you today because I could not think of anything where you might ... **[Laughter]** I challenge systems. In my last role I had a global reach for financial crime, 250 financial crime investigators. There were more financial crime investigators than I have cops in Jersey and my travel bill was extraordinary. You would have to send 2 officers to corroborate each other on a trip to South Africa to take a statement where a witness had been defrauded of £3 million or whatever.

[15:45]

In the end that worked out it is much cheaper just to send the witness an economy B.A. ticket to come to London and then go and visit aunty in Luton. It was much cheaper to get the witness to come to the U.K. and I would take a statement in my office. Unorthodox nod but it worked and it saved quite a bit of money.

**Deputy A.D. Lewis:**

Yes. I wish you were here several years ago.

**Chief Officer, States of Jersey Police:**

It probably breached every financial code of conduct going because I was sending a freebie ticket to somebody to travel around the world to come to London but it worked.

**Deputy A.D. Lewis:**

Yes, okay.

**Chief Officer, States of Jersey Police:**

Say, for example, here in Jersey, if I have a training need I pay for a trainer to come from the U.K. and deliver the training in Jersey and probably stay at the Savoy hotel, rather than send a dozen officers off to some specialist course and pay them subsistence and travel because it is cheaper to do it that way and that is what we do. It is a general theme, get the trainers to Jersey and deliver locally and pay for the hotel.

**Deputy J.A. Martin:**

I think you have probably answered this but I will ask it, do you believe the system is fit for purpose?

**Chief Officer, States of Jersey Police:**

The system allows me to be a Chief Officer and have a little bit of flexibility. I have my own policy, which is value for money in accord with the code of conduct and in accordance with the financial directions.

**Deputy J.A. Martin:**

Yes, again, because you have, as you say, quite a small amount of travel you can challenge it a lot easier as well.

**Chief Officer, States of Jersey Police:**

But my worry, if I may share my concern, that I have no need to go gallivanting off to international police conferences and most things you can do on Skype or online anyway. Jersey does punch above its weight. It is a player in the financial service industry and it would be awful if we created a climate where people were afraid to travel for the greater good for fear of being hauled up over the coals on what appears to be a glamour trip. None of these trips are glamour trips. I have been to some very glamorous places in the world but, believe me, none of them were glamorous. A smoke-filled conference room is a smoke-filled conference room. I would be cautious about

creating a climate of fear where people do not do things for the greater good of Jersey for fear of being hauled over the coals because they had a glass of bubbly in a B.A. lounge.

**Deputy A.D. Lewis:**

There has got to be a level of discretion here, which all of you, as senior officers, are more than capable of making a decision, as are many of your subordinates. We fully accept that. You are stating certain things we want to hear, which is the code of conduct is being followed, directions are being followed. You have truly demonstrated, I think, that you, at every opportunity, are ensuring good value for the public purse and that is refreshing to hear. We have not heard that from everybody.

**Chief Officer, States of Jersey Police:**

Thank you.

**Deputy A.D. Lewis:**

I would like to perhaps just drill down to - and I think I know what your answer is going to be here - do you task your departments to demonstrate evidence of any return on investment to any investments made in travel and accommodation and so on for things like conferences and overseas visits and there may be some entertainment in there as well? If you do challenge them and find out what is the return for us as a department, how do you do it and if you do not, why do you not? Will the public ever see this in terms of any of your policing reports and so on, so they can see what you have done and why you have done it?

**Chief Officer, States of Jersey Police:**

From my point of view, for example, it is important that we go to Egmont conferences, which is the organisation that sets the standards for Financial Intelligence Units, which are, I think, 189 member states and it is important we go. I do not think the public would be very interested in the feedback from that because it is about specific technical learning. My head of Financial Crime, the D.I. (Detective Inspector) would come back and then sit down and have an internal conference with, particularly, the intelligence unit and others within the department, so what is going on globally, what we are learning from others but that would be very restricted to internal. I try and keep our links with the National Crime Agency in the U.K. and the F.B.I., which I am a graduate, because that gives us a whole global network of international crime network, which, for example, the F.B.I. invest in very heavily. I was very happy to send one of my officers to the Bureau for the Leadership Executive Course, which is a 2-week course that came free, including accommodation. It was a great honour to be offered the course and take it. It was quite expensive travel but it was offset by absolutely nil costs. She came back and disseminated the benefits in the network. She picked up a global network through a 2-week very intense course in Quantico.

**Deputy A.D. Lewis:**

Yes, it is difficult perhaps to quantify in monetary terms but in terms of overall experience and how it can then better inform the rest of your team here back here, invaluable.

**Chief Officer, States of Jersey Police:**

Yes. Then they come back and talk to me and then disseminate it through. We have programmes, learning days in the shift system, so anything like that would be fed back to the benefit of others. But the public, whether they would be interested in it, it is not the kind of thing I would give to the *J.E.P. (Jersey Evening Post)* because I do not necessarily think the readers would be interested frankly.

**Deputy A.D. Lewis:**

Tom, do you have any comments on that?

**Chief Officer, Community and Constitutional Affairs:**

It is very similar; the Fire Service go across to Gatwick every year or 2 because there is a requirement for them to do live-fire training. We do not have a big live-fire facility in Jersey, so we go to Gatwick Airport and they travel across and they set fire to the thing at Gatwick Airport that everyone else uses and they train and they put it out. I think the value of that is pretty obvious really in terms of keeping the skills of our firemen up to date. The other expense, as you can see from the sheet, has been Customs and Immigration and that has all been about borders and drugs control. A lot of that is for dog training because we have a very small dog team. We needed to work in the same way as the Border Agency dog teams work in the rest of the common travel areas. They go and they train alongside, again, their counterparts at Gatwick and elsewhere in the southeast and they learn their skills in doing drug detection and other things. We do the same with things like fraudulent documents. We have been doing a lot more training on kind of document identification over the last few years, which is part of our strengthening of our own border controls, to make sure that we are excellent at spotting fake I.D.s (Identifications), fake documents, fake passports. Again, that is not training that it is cost effective to do here in Jersey and so the officers go across and they do that alongside the U.K. Border Agency counterparts. Again, I think the benefit of doing that is pretty obvious.

**Deputy A.D. Lewis:**

Okay. I just want to finish with a final question really, which we kind of skirted about a little bit already but there has been a lot of adverse publicity recently about this particular subject. Mike, you have quite clearly said and you were right where you do not want to stifle enthusiasm, entrepreneurship and a desire to learn new things and so on. But, as a result of that unfortunate publicity that has occurred in recent months, related to corporate travel and related expenses, are

there any changes that you have made in your departments and anything you have learned from that experience that others have gone through on the Corporate Management Board that you can take away and make some improvements and changes in your department at all in relation to this?

**Chief Officer, States of Jersey Police:**

No.

**Deputy A.D. Lewis:**

You are quite satisfied that you were doing everything that you needed to do already.

**Chief Officer, States of Jersey Police:**

Yes.

**Deputy A.D. Lewis:**

The same for you, Tom.

**Chief Officer, Community and Constitutional Affairs:**

Yes. As mentioned, I have made that one change in that now the service heads require my sign off on their travel, which I think is a sensible cautionary principle. My personal travel is signed off by the Chief Executive - my one trip to Guernsey I had signed off. Again, I think that is a sensible enhancement and a cautionary principle while we await the development of an enhancement of the central guidance and then we will adjust again, once we have seen how that works. My personal hope is that that central guidance is very much principles-based.

**Deputy A.D. Lewis:**

Yes, that is what we have recommended.

**Chief Officer, Community and Constitutional Affairs:**

I think the principle where you have to deliver value for money, the principle that you should not accrue any personal benefit from taxpayers' expenses and travel, are all sound and should be clear, crisp guiding principles that every public servant should welcome.

**Chief Officer, States of Jersey Police:**

Yes. I think, Chairman, you have raised a number of things that I think perhaps the centre do need to look at and that is, is there an adequate travel policy that covers the basics? Can people unwittingly accrue what could be perceived as a personal benefit from corporate travel, whether they know it or not? That is a bad thing, that needs to be stopped. Are we getting the best deal through a procurement arrangement? If we are not there is something wrong, we ought to be, for

the greater good at the end of the year for all of us, notwithstanding any little hiccups in between. It is a good thing for a small island. It punches above its weight and has a global voice in the financial industry to travel and spread the word at how good they are and attract new business, particularly in the uncertain Europe we live in.

**Deputy A.D. Lewis:**

You are saying you do not want anything to discourage that as long as the public are reassured that their money and their taxes are being spent appropriately in accordance with laws and guidelines that are laid down. I would hope that we will continue to do exactly that. With the rest of the world that is in turmoil over the next few months, with a bit of luck we will not be but, unfortunately, we are not totally insulated. I do not think we have any further questions.

**Mr. R. Parker:**

Can I just add something? Obviously, we are not after a witch hunt in relation to specifics or any aspect like that. The whole concept, I think the main important thing and just following on from what Andrew said, is related to the culture of the public sectors, a lot of really hard-working people there. When you are looking at basically bringing in reform, it is very important to be able to take people with you, to show that basically you are using your money as if it was your own and that is important to the taxpayer to obviously support the changes that I think are obviously necessary and, again, to be quite a challenging time going forward.

**Chief Officer, States of Jersey Police:**

You raise the culture point, it is very important. We have a very good culture, notwithstanding what we read sometimes in the media. I am absolutely delighted with the incredible team that work for me and I am sure you are of the view that they are enterprising, they are flexible. We are breaking new ground in the terms of the way we think, breaking away from Dickensian practices. I worry about policy. There is more policy than you can shake a stick at here. What we need is central guidance. This is the code of conduct, this is the guidance. We do not need reams of policy. Let us exploit the fantastic culture that we have now and not create one of fear.

**Mr. R. Parker:**

I think that the key things that we have been pushing for is policy based on principles because if you end up creating a policy based on prescriptive practices it is very difficult to allow people to make the changes going forward. Very much that the prescriptive elements should be by department in relation to the systems that are basically installed, that the basic overall Government policy should be based on principles.

**Deputy A.D. Lewis:**

That is what the C.A.G. said and that is what we are reiterating.

**Chief Officer, States of Jersey Police:**

Thank you.

**Deputy A.D. Lewis:**

Good luck with running your departments, you are certainly doing a fine job and thank you very much for your time today.

**Chief Officer, States of Jersey Police:**

Thank you.

[15:57]