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# STATES OF JERSEY



## **SAFER TRAVEL GUIDELINES: FINAL REPORT (S.R.8/2020) - RESPONSE OF THE MINISTER FOR HEALTH AND SOCIAL SERVICES**

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**Presented to the States on 11th February 2021  
by the Minister for Health and Social Services**

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**STATES GREFFE**

**SAFER TRAVEL GUIDELINES: FINAL REPORT(S.R.8/2020) - RESPONSE  
OF THE MINISTER FOR HEALTH AND SOCIAL SERVICES**

<b>Ministerial Response to:</b>	S.R.8/2020
<b>Ministerial Response required by:</b>	24th December 2020
<b>Review title:</b>	Safer Travel Guidelines: Final Report
<b>Scrutiny Panel:</b>	Safer Travel Guidelines Review Panel

## INTRODUCTION

I welcome the Panel's review of the Safer Travel Guidelines and thank members for the opportunity to comment and respond to the Report's findings and recommendations.

## FINDINGS

	<b>Findings</b>	<b>Comments</b>
1	Inbound travel has significantly impacted the number of positive COVID-19 cases within Jersey. The number of non-travel related infections of COVID-19 in Jersey remained relatively low from July until September. However, the Panel notes the number of active cases has been rising rapidly since October 2020.	<p>The introduction of the Safer Travel Policy impacted the number of positive cases identified in Jersey due to the volume of tests being conducted on arriving passengers leading to an increase in positive cases being detected. Whilst it is inevitable that inbound travel has resulted in the introduction of cases to Jersey, the Safer Travel policy has provided a proportionate response to the level of risk through the evidence-based targeting of testing and isolation requirements.</p> <p>In Jersey, opening of the borders on 3 July was facilitated by the Safer Travel Policy which put in place a series of testing and isolation requirements for arriving passengers. A risk stratification process (red/amber/green rating of countries) was used to reduce the risk of importing any new cases of the Covid-19 virus into the community.</p> <p>Throughout July, August and early September, there was evidence of only very low on-Island transmission. The border testing programme effectively identified the majority of new cases either on the day of arrival or on a day 5 test. For a small number of these cases, there was very limited transmission to immediate household contacts who were already in isolation.</p>

	<b>Findings</b>	<b>Comments</b>
		<p>From mid-September, the number of cases in the UK, France and beyond began to rise and the likelihood that an arriving passenger would test positive increased. The Safer Travel Policy was correspondingly adjusted in order to respond to this risk, with the introduction for green arrivals of self-isolation until the result of a day 0 test and an additional day 5 test.</p> <p>In October, the number of cases, household groups and clusters of new cases not clearly linked to arriving passengers (unknown source) began to rise, indicating that transmission was occurring on-Island outside affected households, most likely through individuals without symptoms or with mild symptoms who were unaware they had the virus.</p> <p>This trend has continued into November with the majority of new cases now no longer associated with inbound travel, although most are linked to an already known case on-Island.</p>
2	The Safer Travel Guidelines was implemented on the understanding of “balanced risk”.	The implementation of any public health measure is a balance of considerations. In the case of the Safer Travel Policy, there is a balance to be struck between the proportionate deployment of testing and isolation requirements at the border and the various harms caused by a reduction in travel or a reduced connectivity for islanders.
3	Medical statistics and forecasts of onward infections have developed over time based upon testing regimes and accuracy of tests.	In line with all other jurisdictions, the understanding of the COVID-19 virus has developed quickly through the course of the pandemic, assisted by increased range and availability of testing technology.
4	Medical advisors acknowledge that risks are perceived differently by different people, and a balanced approach is needed.	Agreed
5	The Safer Travel Guidelines has used natural decrease of traveller numbers	It is understood that demand for travel will be impacted by a number of factors including standard seasonal variations, increasing restrictions in neighbouring jurisdictions and the

	<b>Findings</b>	<b>Comments</b>
	due to infection rates in neighbouring counties, within its strategy.	nature of risk mitigations in place, particularly with regard to isolation on arrival in jersey.
6	The RAG rating will likely lead to fewer incoming travellers and more of those travelling will face isolation for greater periods of time.	The continued increase in case notification rates in neighbouring jurisdictions and domestic public health restrictions has led to a drop in travel demand; the majority of arriving passengers are now classified as red on arrival and attract a longer period of self-isolation. From 20 November, arriving passengers have been subject to a revised 'triple testing' programme which will reduce the maximum isolation period from 14 days to around ten. [Note: this comment was agreed before recent changes.]
7	The Safer Travel Guidelines has impacted islanders' mental wellbeing both positively and negatively.	The outcome of a robust Safer Travel Policy has been of benefit in a number of areas including mental health, family cohesion, education and business.
8	The Safer Travel Guidelines has directly reintroduced COVID-19 into the community.	It is not accepted that the Safer Travel Policy reintroduced COVID-19 into the community. While it is inevitable that positive cases will be detected at the border, there is insufficient evidence to conclude that the Safer Travel Policy was solely responsible for a subsequent increase in case notification rates.
9	Onward transmission has started to impact islanders.	It is clear that onward transmission has begun to impact islanders as reflected by the increased case notification rate and subsequent public health mitigation implemented.
10	Recommendation 4 of the Panel's Interim Report, calling for self-isolation of all arrivals, has now been carried out, bar isolation within Government provided facilities.	The on-island testing facility is now fully functional and has a maximum operating capacity of 2000 tests per day. This testing capacity has enabled a policy to direct every arriving passenger to self-isolation for at least 24 hours whilst waiting for their first test result.
11	Self-isolation requirements have been updated to match the risk of infection from travellers, as well as capacity of testing systems.	The assessment of country and region risk classifications is carried out and updated on a weekly basis, thereby reacting to the risk of infection posed by cohorts of travellers from

	<b>Findings</b>	<b>Comments</b>
		different jurisdictions. The requirement to self-isolate or the testing regime imposed is based on the assessed risk to public health and is not affected by testing capacity.
12	Very few individuals choose not to participate in border testing.	The levels of participation in the Safer Travel Testing Programme have been consistently high. This is considered a substantial positive and is indicative of the appetite for testing at the border and the benefit of the policy to the island's connectivity.
13	Current policy assumes that children at boarding schools are appropriately isolated from surrounding communities before travel.	The policy for children returning from education or care placements was approved by the Consultant in Communicable Disease Control. The application process includes a declaration that the child has not been identified as a direct contact or required to isolate under public health guidance in the 14 days prior to arrival.
14	Policies for university students returning to Jersey were still being finalised at the time of this review.	The Government of Jersey has established a cross-government Travel Cell to scope and implement policy for returning University students. This will include the need to ensure travel connectivity and support to isolate on arrival in Jersey for those who require it.
15	Exemptions to isolation requirements for essential workers are reviewed on a case by case basis.	Applications for permission not to isolate for work purposes are made through a standardised application process with clear eligibility criteria. Each application must be supported by evidence of risk mitigations in the workplace and the permission only applies to the period of time the individual is at work. While each application is considered individually by the Contact Tracing Service, any approval is given within a clear and published framework.
16	It is assumed that groups of visiting workers will segregate themselves from the larger community.	Applications for permission not to isolate for work purposes are approved on the basis that the worker isolates at all other times when not at work for the period of time as designated by their travel history. Applications for permission in instances where the work involves a public facing aspect are

	<b>Findings</b>	<b>Comments</b>
		unlikely to be approved unless in exceptional circumstances.
17	Day 0 tests have been prioritised for on-island analysis, leading to a difference in times to receive test results.	As the on-island testing facility was established, Day 0 tests were prioritised to avoid arriving passengers having to isolate unnecessarily. The overwhelming majority of all tests are now processed at the on-island facility and benefit from the same rapid result turnaround time.
18	The on-island testing facility is still building capacity and will be used for subsequent (day 5) tests, as well as community testing.	The overwhelming majority of all tests are now processed at the on-island facility and benefit from the same rapid result turnaround time.
19	Further testing capacity is envisaged, pending quality assurance of equipment.	The on-island testing facility is now fully functional and has a maximum operating capacity of 2000 tests per day; this is well within current and anticipated testing requirements.
20	The contract tracing team is now resourced; however, some procedures still slow the tracing of individuals.	From the point that an individual is identified as a direct contact of a confirmed COVID-19 case, every effort is made to contact that person at the earliest opportunity. Resources are in place to meet the demands placed on the Contact Tracing Service with active recruitment ongoing.
21	The majority of direct contacts are traced within 24 hours. There has been at least one positive case of which the source cannot be traced.	There are now more cases on-Island that cannot be linked back to a travel-related source. However, we are linking cases to specific events or workplaces and establishing new clusters through that method
22	The Jersey COVID alert app will not be mandatory for travellers, although will be strongly recommended. Furthermore, self-isolation on notification by the app that an individual has come into contact with a positive case will not be mandatory.	Mandated use of the app is not considered preferable for a number of reasons. In the first instance, the compulsory use of the technology would not be in line with European Commission guidelines. It would also be discriminatory against those who do not own, or know how to operate, the necessary smart device technology. In addition, there are enforcement challenges in legislating for mandatory use; for example, the act of switching off a mobile phone or simply leaving it at home could in those circumstances become a criminal offence.  The implications of delivering and enforcing an

	<b>Findings</b>	<b>Comments</b>
		<p>isolation order via the app rather than from authorised and empowered officers and the right to deprive someone of their liberty based on a relatively unproven automated system have not been fully explored in Jersey's legal context.</p> <p>The non-mandated approach to both usage and action on notification is felt to be best suited to encouraging mass participation and engagement with the technology.</p>
23	The Jersey COVID alert app is now compatible with those used in the UK.	The underlying tools in the device operating system are common to all modern android and iOS devices. We have since worked with our counterparts in England/Wales, Scotland, Northern Ireland and Gibraltar to exploit that commonality and create a seamless user experience across nations. Users don't have to do anything to remain protected by their apps as they travel in the UK.
24	Some individuals may not be contacted for 72 hours when failing to respond to Government SMS messages.	The policy for SMS follow-up has been revised to reflect this position with non-response being followed up within the 36-hour period.
25	There have been some issues with the SMS text message system for a minority of individuals.	In a small number of cases, network or data issues have prevented individual travellers from responding to SMS contact.
26	The monitoring and enforcement team have carried out a significant number of actions to check adherence to rules.	The number of checks is significant and is central to the credibility of the Safer Travel Policy.
27	There are individuals who continue to breach self-isolation requirements.	It is inevitable that some individuals will breach the isolation requirement. Nevertheless, the regime of monitoring through home visits is robust and ensures that any non-compliance runs the credible risk of detection and prosecution. Our monitoring and enforcement regime acts as a significant deterrent to non-compliance and compares extremely positively to the enforcement activity seen in neighbouring jurisdictions.
28	There is difficulty in investigating the truthfulness of the declaration on the	Given the volume and scope of information collected at pre-registration, it is not feasible to verify the authenticity of all information provided;

	<b>Findings</b>	<b>Comments</b>
	travel registration form and in declaring travel history.	the system relies on a participant engaging with the process in good faith. Nevertheless, where instances of wilful misinformation are suspected, these are investigated and, in appropriate cases, will be prosecuted. All participants are informed that knowingly providing false information is a criminal offence, punishable by a fine of up to £10,000.
29	Areas of the Safer Travel Guidelines continue to rely on the good will of individuals travelling to the island.	It is accepted that with regard to the provision of information and adherence to the isolation requirement, the overriding expectation is that individuals will comply in good faith. Nevertheless, where instances of wilful non-compliance or misinformation are suspected these will be investigated and prosecuted. The consequences of a failure to comply with the requirements are stated clearly in the Safer Travel Guidance and, in relation to the isolation requirement in particular, a number of successful prosecutions have resulted from monitoring and enforcement activity.
30	Communication of the Safer Travel Guidelines remains predominately electronic and digital in nature.	It is accepted that, as far as possible, it is preferable to make important guidance available in a number of formats. However, given the rapidly changing context of the pandemic, the repeated updating of paper documents or printed public facing material has often been impractical or not cost-efficient. As far as possible, the necessary information will continue to be provided in as wide a range of media as possible.
31	Further transparency in the decision making behind Safer Travel Policies is still needed and timely communication of future changes to the Guidelines continues to be an issue.	The rapidly developing nature of the COVID-19 pandemic has required an agile and flexible approach across all policy areas, including the Safer Travel Policy. Within such a context, it is not always possible to communicate developments within the timescales which would otherwise be expected. On each occasion when a change in policy has been required, every effort has been made to ensure that the highest quality information is available to the public and stakeholders at the earliest opportunity. This will remain the case.

	<b>Findings</b>	<b>Comments</b>
32	Various actions are taking place to compliment the Safer Travel Guidelines during the upcoming winter.	The Government of Jersey's COVID-19 Winter Strategy comes into effect on 20 November. Under the strategy there are eight main actions being taken over the winter to keep islanders secure, safe and well: increasing on-Island testing; continually updating our classifications of countries and regions; introducing mask policies for indoor public spaces; adopting shielding programmes to keep people at high risk safe but connected; vaccinating for flu and for COVID-19; making sure all of Government is prepared, especially in supporting care, health and economic interventions; being ready to escalate if needed, but using the 'least overall harm' principle; and communicating about sensible behaviour, underpinned by guidance and backed with enforcement.

### RECOMMENDATIONS

	<b>Recommendations</b>	<b>To</b>	<b>Accept/ Reject</b>	<b>Comments</b>	<b>Target date of action/ completion</b>
1	As infection rates have increased in neighbouring jurisdictions stricter self-isolation periods must be considered. Specifically, from immediate effect, those travelling from Green regions should isolate until a day 5 negative test. Urgent consideration should also be given to the requirement for those travelling from Amber regions to isolate for 14 days.		Not accepted	Under an update to the Safer Travel Policy as advised by STAC, from 20 November all arriving passengers will be required to undergo 3 x tests on Day 0, 5 and 10. Isolation periods will be linked to this testing framework with green arrivals isolating until a negative Day 0 test result, Amber arrivals isolating until a Day 5 negative test result and Red arrivals isolating until a Day 10 negative test result. (Note: since the above text was agreed, the policy has been further updated.)	

	<b>Recommendations</b>	<b>To</b>	<b>Accept/ Reject</b>	<b>Comments</b>	<b>Target date of action/ completion</b>
2	As it has been shown that children and students are capable of transmitting the virus, from immediate effect, they should be treated the same in relation to self-isolation rules and inbound travel, to decrease the risk of further school closures and onward transmission.		Not accepted	The testing age threshold at the border is fixed at 11 years of age. This threshold is based on the fact that the overwhelming majority of children under the age of 11 are accompanied by adults who are tested, therefore the risk of infection within the travelling group is appropriately assessed. The introduction of testing for under 11s at the border is not considered a proportionate intervention based on medical advice.	
3	Clear, contingent planning for the return of university students must be undertaken, including a firm policy on what provision and support will be made available to enable them to self-isolate safely on their return. This should be finalised and announced by the Government without delay.		Accepted	The Government of Jersey has established a 'Travel Cell' led by officers of the Chief Operating Office and CYPES to scope the issue of returning university students and progress appropriate support in terms of travel connectivity and support to isolate.	Immediate / completed
4	Greater clarity and formalised, publicly available rules for visiting workers, should be provided before the end of November 2020.		Not accepted	The eligibility criteria and public health guidance for arriving workers wishing to leave isolation for work purposes are available on Gov.je. The process is underpinned by a clear set of eligibility criteria, a formalised application process and a set of risk mitigations which must be in place to receive permission.	
5	As soon as practical, enable day 5 testing through the on-island lab as a priority to allow people to return to the community in a timely and safe manner.		Accepted	Other than in unforeseen or exceptional circumstances, all Day 5 test are now processed through the on-island Opencell laboratory.	Immediate / completed

	<b>Recommendations</b>	<b>To</b>	<b>Accept/ Reject</b>	<b>Comments</b>	<b>Target date of action/ completion</b>
6	Before the end of December 2020, investigate and agree suitable data protection protocols, approved by the Information Commissioner, for more expedient retrieval of plane manifests, in order to be able to identify direct contacts quicker.		Accepted	Information sharing arrangements are now in place with commercial travel operators facilitating the rapid sharing of information for contact tracing purposes. The track and trace team is now receiving passenger manifests in a fast turnaround from the appropriate companies.	Immediate / completed
7	With immediate effect, promote the Jersey Covid Alert app predeparture to all travellers, including those departing Jersey, and ensure strong suggestion of self-isolation if notified of a positive case interaction before contacting the helpline.		Accepted	Passengers will be made aware of the COVID Alert App at pre-registration. From 8 December those identified as direct contacts through the app will be told to isolate while awaiting contact from the Contact Tracing Service.	Immediate / Dec 20
8	With immediate effect, individuals who fail to respond to wellness SMS text messages for 36 hours should be followed up to ensure symptomatic individuals are not interacting with the larger community.		Accepted	The policy for SMS follow-up has been revised to reflect this position with non-response being followed up within the 36-hour period.	Immediate / completed
9	With immediate effect, bolster enforcement team's visits to those in self-isolation to check for adherence to the rules.		Accepted	Resources have been made available to increase the Monitoring and Enforcement Teams capacity. Resources will continue to be available to meet demand and ensure that the isolation requirement is effectively monitored.	Immediate /ongoing
10	Further communication of the importance of self-isolation and the		Accepted	The consequences of non-compliance with isolation requirements will continue to be communicated clearly through	Immediate /ongoing

	<b>Recommendations</b>	<b>To</b>	<b>Accept/ Reject</b>	<b>Comments</b>	<b>Target date of action/ completion</b>
	consequences for not doing so i.e. fines, should take place by December 2020, to help build greater compliance.			appropriate means to encourage compliance.	
11	The travel registration form should be amended with immediate effect to deal specifically with the matter of truthful declaration of travel history. Consideration should also be given to ways in which this message can be reinforced to travellers, including the consequences for non-compliance.		Accepted	The travel form is being amended to emphasise the offence of knowingly providing false information, which is punishable by a fine of up to £10,000.	Immediate /Dec 2020
12	Consideration should be given to the prioritisation of non-digital communication of the Safer Travel Guidelines as soon as possible.		Accepted	Hard copies of the Safer Travel Guidelines are available.	Immediate /ongoing
13	Decisions surrounding the Safer Travel Guidelines must be made in a timely manner, with options clearly communicated ahead of time to allow for inclusion of the States Assembly and Scrutiny in any decision making.		Accepted	Communication of changes to the Safer Travel Policy to the States Assembly will be as clear and timely as possible within the context of the rapidly changing pandemic situation.	Immediate / ongoing
14	Simple, clear, and frequent communication of the Safer Travel Guidelines must continue		Accepted	Effective and timely communication of the Safer Travel Guidelines will continue indefinitely.	Immediate / ongoing

	<b>Recommendations</b>	<b>To</b>	<b>Accept/ Reject</b>	<b>Comments</b>	<b>Target date of action/ completion</b>
	through the winter period.				

### **CONCLUSION**

I am pleased to accept the majority of the Panel's recommendations and thank the members of the Panel for their interest and work in this important area. As I said at the time of the Panel's interim report, the testing and tracking arrangements together with the Safer Travel guidelines have helped the Island contain the spread of Covid-19, while allowing Islanders and visitors to enjoy greater freedoms at the same time as protecting public health. Of course, continued vigilance is required and the arrangements are under constant review by STAC and the public health team.