

1. What percentage of your workforce is employed on a Jersey Work Permit?
 - a. Directly employed by GR8
 - i. 30 professional construction workers which is 65% of the employed temp work force in the local construction sector.
 - ii. We expect to employ an addition 50 – 70 this year
 - b. Recruited and employed by clients of GR8 circa 400+ pan-island.
2. What impact do you feel the WPP, and the overall Work Permit system, has on your business?
 - a. The WPP is a corner stone of GR8 and its client base which was explored pre-Brexit when it became evident that the flow of transient workers into Jersey would significantly reduce. The use of WPP has become a feature of daily business with GR8 becoming subject matter experts in the use of them as well as the creation, developments, solid working business relationships pan-sector and in and around both the private and public sectors
3. As an employer, do you feel that the WPP clearly sets out employer and employee obligations?
 - a. The WPP is very clear in its statutory requirements for both employer and employee regarding the issue of WPs and give basic guidance as to what is expected from the employer to the employee, the guidance to the employee is practical but has no ethical requirements, these are set within GR8 from experience gained by dealing with various barriers that have been experienced and reported by employees, we now send out a required code of conduct to employers as part of our T&Cs, those who don't sign and agree to it simply will not be able to access our services.
4. Do you feel there is enough information available to employers and Work Permit holders on matters related to employment and accommodation?
 - a. From the perspective of GR8, yes, I do but this has been learnt through going through the process hundreds of times, it's a business need (and moral need when dealing with people's lives) to continually learn and improve user experiences and ensure that anyone who leaves their home country and travels to work and support a community (Channel Islands wide) need to be as well prepared as possible and their expectations are managed.
5. Do you feel that the WPP would be a useful document to refer to in the event of a dispute between an employer and a Work Permit holder?
 - a. Yes, this has been done several times by GR8 who will work as an intermediary between an employee sourced by GR8 and a client who has employed the individual and has been a point of reference for policy and how disputes can be resolved. It is worthy to note that from experience a dozen or so issues that have arisen (that GR8 are aware of) there has usually been an issue around performance and competency.
6. Have you received questions about the WPP from any of the Work Permit holders you employ?
 - a. Constantly, we receive and deal with enquiries daily which we deal with on the phone, by mail or at time face to face meeting through walk ins in's, pre-arranged appointments, about half of these enquiries come from non GR8 employees' / candidates.

7. Have you raised any issues or concerns about the WPP to the Jersey Customs and Immigration Service or any other relevant authorities or organisations?
 - a. GR8 has an excellent relationship with JCIS and the Population Office (and with equivalent departments in Guernsey) with regular enquiries to and from them we ensure that compliance is continually met or when an issue is identified it is rectified immediately. The company has worked with various charities and support groups who support employees who use the WP program and will continue to develop such relationships to ensure best practice is followed.

I believe that an informed opinion on the panels terms of reference would also be beneficial and I have added notes:

1. To examine and consider the process of obtaining a Jersey work permit, to include;
 - a. the relationship between Jersey work permits and UK visas; and
 - i. My understanding is that the UK CIS views the Channel Island of very low risk and that the process of issuing visa's has vastly improved, the UK High Commissioner in Kenya has worked to improve the process times of visas, Link: [Nairobi News UK Visas issued in three weeks](#)
 - b. the information provided to applicants during the application process;
 - i. This could be improved by a regulated and appropriate code of conduct that all user must agree to
 - c. the funding requirements of the Jersey work permit application process.
 - i. Instead of GoJ administering this process could the private sector be required to apply for a "Sponsor" status and only businesses who are authorised to deal with WPs and issue advice and guidance be able to access the JCIS, similar to the UK system
2. To examine Jersey's Work Permit Policy and determine its effectiveness in:
 - a. ensuring the welfare of work permit holders;
 - i. I believe this is very much down to the moral standards of the individual employer
 - b. protecting work permit holders from exploitation and 'Modern Day Slavery';
 - i. Any business who uses WPs should have or be in the process of having an Anti-Slavery Policy in place, ours is in the final draft alongside our Anti-Corruption Policy
 - c. providing guidance in relation to supplementary employment, variation of employment contracts, termination of employment, accommodation and employment disputes.
 - i. Compliance of the Employment Laws should be sufficient to address this?
3. To identify and assess the welfare obligations placed on employers of work permit holders and to examine:
 - a. any relevant guidance or support provided by the Government; and
 - i. Code of Conduct
 - ii. Sponsored Status
 - b. any relevant legislation;
 - i. Existing Employment Law
 - c. how fulfilment of the obligations is reviewed.
 - i. Sponsored status to require the holder to meet a pre-set standard and report back in to the standards being met or any breaches being reported to the relevant GoJ department

4. To identify and assess:
 - a. the financial obligations that employers and work permit holders have to the Government; and
 - i. I suggest that the current level of charges is sufficient if the administration is maintained by the JCIS
 - ii. At no point should charges be levied to the work permit holders, they are here to make a good living, any additional charges would be counter beneficial
 - b. any Government services or benefits available or not available to temporary work permit holders.
 - i. Immediate Health Care
 - ii. Consideration of a reduced Tax and SSD rate as the main intent of those working on WPs is financial and the vast majority will never access a pension, income support, pensions or any other associated benefits.
5. To identify and consider temporary work permit holder protection practices in other relevant jurisdictions.
 - a. The UK, Jersey, Guernsey and the IoM are all jurisdictions that GR8 operates in, I believe that the Crown Dependencies could and should take a joint approach as currently all three operate in differing ways with compliance and governance differing, each has good and bad parts to their WP policies.
 - b. International Employment, Slavery and Corruption Laws