

Freedom of Information (Jersey) Law 2011

DECISION NOTICE

JOIC Reference	CAS-02101
Date of Decision Notice	11 June 2020
Scheduled Public Authority	Health & Community Services (the SPA)
Address	19-21 Broad Street St Helier Jersey JE2 3RR
Date of Initial Request	11 February 2019
Date of Initial Response	29 March 2019
Date of request for Internal Review	8 April 2019
Date of Internal Review	22 August 2019
Date of final appeal to Information Commissioner	16 September 2019

Summary/Decision

1. On 11 February 2019, the Complainant requested certain information from Health & Community Services (the **SPA**) relating to insurance cover for compensation paid by the Government of Jersey in respect of certain personal injury claims (the **Request**).
2. The SPA wrote to the complainant on 29 March 2019 (the **Initial Response**) stating that the information sought was being withheld (the **Withheld Information**), citing the exemptions at Arts.26, 33 and 34 of the Freedom of Information (Jersey) Law 2011 (the **Law**). The Complainant did not agree with the Initial Response and requested an internal review on 8 April 2019 (the **IR Request**).
3. The SPA did not respond to the IR Request and the Complainant appealed to the Information Commissioner (the **Commissioner**) seeking a review of the manner in which the Request had been handled, including the failure to respond to the IR Request.
4. Following intervention by the Commissioner, the SPA responded to the IR Request on 22 August 2019 (the **Internal Review**).

5. The Complainant did not agree with the outcome of the Internal Review and appealed to the Information Commissioner (the **Commissioner**) on 16 September 2019 (the **Appeal**).
6. The Commissioner's decision is that the SPA has complied with some of the requirements of the Law but not complied with others. However, there are no further steps the Commissioner requires the SPA to take.

The Role of the Information Commissioner

7. It is the duty of the Information Commissioner (the **Commissioner**) to decide whether a request for information made to a SPA has been dealt with in accordance with the requirements of Part 1 of the Law.
8. This Decision Notice sets out the Commissioner's decision.

The Request

9. The Complainant's Request was in the following terms:

"Compensation Settlement

Further to two recent FOI responses

<https://www.gov.je/Government/Pages/StatesReports.aspx?ReportID=4239>

and

<https://www.gov.j/Government/Pages/StatesReports.aspx?ReportID=4155>

The earlier FOI response clearly states that the States insurer will meet all the cost of the settlement where it states "the States of Jersey insurance arrangements will fully meet the settlement reached."

The later response makes reference to an excess payable under the insurance policy.

The two responses are in conflict. If the insurance arrangements "fully meet the settlement" then there cannot be an excess.

Please advise:

1. *Did the States of Jersey's insurances fully meet the settlement reached with zero excess to be paid?*
2. *If there was an excess to be paid, please confirm that the response given to the earlier FOI request was factually incorrect.*
3. *If the excess(es) was/were an element of the settlement(s) please advise the source and controlling authority of the funds used to meet the excess.*
4. *Was/were the settlement(s) made as one off lump sums for each claim or will periodic payments be made.*
5. *If periodic payments are to be made please state the planned frequency of these and whether excesses apply to these" (the **Requested Information**).*

10. On 29 March 2019 the SPA provided the Initial Response in the following terms:

"Response

A to D

The requested information is exempt on the grounds of:

Article 26 (Information provided in confidence); the Government of Jersey are bound by confidentiality not to discuss the terms of this settlement

Article 33 (Commercial interests); the insurers wish to preserve their position with regard to this matter

Article 34 (Economic interests); it is not in the public interest to know the insurance arrangements of the Government. To disclose this information may prejudice the arrangement we have which may inadvertently be economically damaging to the Government of Jersey

Articles applied

Article 26 Information supplied in confidence

Information is absolutely exempt information if –

(a) it was obtained by the scheduled public authority from another person (including another public authority); and

(b) the disclosure of the information to the public by the scheduled public authority holding it would constitute a breach of confidence actionable by that or any other person.

Article 33 Commercial interests

Information is qualified exempt information if –

(a) it constitutes a trade secret; or

(b) its disclosure would, or would be likely to, prejudice the commercial interests of a person (including the scheduled public authority holding the information).

Article 34 The economy

Information is qualified exempt information if its disclosure would, or would be likely to, prejudice –

(a) the economic interests of Jersey; or

(b) the financial interests of the States of Jersey.”

The Investigation

Scope of the case

11. The Complainant wrote to the SPA on 8 April 2019 seeking an internal review. Owing to a lack of communication from the SPA in response to the IR Request, the Complainant made an initial approach to the Commissioner. Following correspondence between the Commissioner and the SPA, the SPA apologised for the delay in replying to the Complainant's IR Request and asked (on 13 August 2019) that the appeal be stayed in order to allow the SPA to carry out the internal review in line with the IR Request. The Commissioner (and the Complainant) acceded to that request.
12. The results of the Internal Review were communicated to the Complainant on 22 August 2019.
13. On 17 September 2019, the Complainant contacted the Commissioner to complain about the way their requests for information had been handled. In particular, the Complainant asked the Commissioner to focus his appeal on the following matters:

"1. The excessive delays in providing me with the information I seek.

2. Not reading the request in the first instance.

3. The corruption of the request I made (omitting a request; rewording requests which give them different meanings.

4. Being unhelpful and evasive in contrast to the statement (10) of the internal review response – "Duty to provide advice and assistance")

5. Ignoring my requests concerning periodic payments."

Chronology

14. On 9 October 2019, the Commissioner wrote to the SPA to advise that the Complainant had made an Appeal to the Commissioner, pursuant to Art.46 of the Law. The SPA was asked to provide their written submissions in response to the complaint made by the Complainant.
15. The SPA responded to that letter on 24 October 2019.
16. The Commissioner has also received very comprehensive submissions from the Complainant (which have been of great assistance to the Commissioner), including copies of the correspondence which had passed between the Complainant and the SPA.
17. In coming to a decision on this matter, the Commissioner considered all the relevant submissions, or parts of submissions, made to him by both the Complainant and the SPA. He is satisfied that no matter of relevance has been overlooked.

Analysis – The Appeal

18. As noted above, the Complainant asked the Commissioner to look at the following matters as part of the Appeal:
- a. The excessive delays in providing the Complainant with the Requested Information (**Issue 1**)
 - b. The SPA not giving proper attention to/reading the request in the first instance (**Issue 2**)
 - c. The purported corruption of the Complainant's Initial Request (omitting a request; rewording requests which give them different meanings) (**Issue 3**)
 - d. Being (in the Complainant's view) unhelpful and evasive (**Issue 4**)
 - e. Ignoring my requests concerning periodic payments (**Issue 5**) (together, the **Issues**).
19. The Commissioner has set out in this Decision Notice the issues that he has had to consider in respect of each issue raised by the Complainant.

Issue 1

The Complainant's Position

20. The Complainant considers that any delays in responding to their Request were excessive; both in providing an Initial Response to the Request and in dealing with the IR Request.

The SPA's Position

21. The Request was submitted by the Complainant on 11 February 2019 (but given the time the request was submitted, the SPA considered the request submitted on the 12 February 2019) and the SPA requested an extension on 18 February 2019, on the basis that the SPA considered that the Complainant's request was complex and would likely take time to respond to.
22. The SPA acknowledges that it was technically outside the timeframe set out in Art.13(1)(a) of the Law in that it responded to the Complainant 32 days after the Request, but considers that it was not in breach because they did not exceed the time period as set out in Art.13(1)(b). This is because Reg.2 of the Freedom of Information (Miscellaneous Provisions) (Jersey) Regulations 2014 (the **2014 Regulations**) allow a SPA to extend the time period for a response to 65 days where such is reasonable in all the circumstances of the case.
23. The SPA considers that as it was genuinely concerned about any inadvertent disclosure that could result in a breach of the Court order (which may result in contempt of court proceedings being issued against the Minister), the extension of the timeframe for response was reasonable in the circumstances.
24. The SPA also acknowledges that it did not comply with its own internal policy for responding to a request for an internal review (20 days) and apologises to the Complainant for failing to do

so. It notes, however, that a failure to adhere to the Code of Practice cannot, of itself, provide an individual with a route of appeal under Art.46 of the Law.

The Commissioner's Determination

25. Art.13 of the Law stipulates that a SPA must deal with a request for information promptly (Art.13(1)). Art.13(2) states that:

"If it supplies the information it must do so, in any event, no later than –

(a) the end of the period of 20 working days following the day on which it received the request; or

(b) if another period is prescribed by Regulations, not later than the end of that period."

26. Reg.2 of the 2014 Regulations is in the following terms:

"2 Time limits for authority to deal with a request for information

For the purposes of Article 13(2)(b) of the Law the period prescribed is such period as is reasonable in all the circumstances of the case, not exceeding 65 working days following the day on which the scheduled public authority received the request."

27. The Initial Response was provided on 29 March 2019, some 32 working days after receipt of the Request.

28. The 2014 Regulations does not define what might constitute a 'reasonable' extension of time and guidance produced by the UK Information Commissioner is of little assistance given the difference in the operative provisions of the equivalent legislation.

29. The SPA acknowledges in its response that it made certain assumptions about the Complainant's Request and that clearly impacted on the way the SPA responded to the Request. Had the SPA engaged with the Complainant at an early stage it is likely, in the Commissioner's view, that any issues could have been addressed at that stage and it is possible that the SPA may have been able to provide a response to the Request within the timeframe envisaged at Art.13(1)(a) of the Law. There is also some contradiction in the SPA's position in that on the one hand they say that it was understood from early in the process that the Request was sensitive and could be time consuming yet on the other hand it needed an additional 12 days to consider matters because it was genuinely concerned about the risks of inadvertent disclosure. It is not clear whether the SPA contacted any third parties in light of these identified risks or otherwise explain why it took 32 days to respond to the request.

30. That being said, the SPA did request an extension early on and the further 12 days did not cause any prejudice to the Complainant.

31. It is for the SPA to explain why any additional time taken to respond was necessary and on the basis of the information provided by the SPA, the Commissioner is not satisfied that it was reasonable in all the circumstances to extend beyond the original 20 working days.

32. Reg.3(6) of the 2014 Regulations sets out the weight that the Commissioner can place on any failure to adhere to a Code of Practice issued under Art.44 of the Law:

"(6) In considering whether a scheduled public authority has discharged its functions in accordance with the Law, the Information Commissioner in deciding an appeal under Article 46, or the Royal Court, in deciding an appeal under Article 47 or in dealing with any matter under Article 48, may take into account a Code of Practice issued under this Regulation and any recommendation made under paragraph (4)."

33. In these circumstances, the Commissioner considers that it is entirely appropriate to consider the SPA's conduct in terms of dealing with the IR Request as against the backdrop of other issues raised by the Complainant, particularly the said delay in dealing with the Complainant's Request.

34. The Commissioner considers that the SPA has failed to demonstrate that it was reasonable in the circumstances to expand the response period and upholds the Complainant's complaint in this regard.

35. No further action needs to be taken by the SPA, however, in respect of this aspect of the Complainant's appeal.

Issue 2

The Complainant's Position

36. The Complainant considers that the SPA failed to 'read' the request properly in the first instance. The Complainant says this is evidenced by the fact that in its Internal Review, the SPA indicated that the Complainant's initial request was unclear but that since clarification had been provided, certain exemptions were no longer relied on by the SPA. Whilst Issue 2 is not necessarily couched in this way, it could be interpreted as suggesting that the SPA deliberately misinterpreted the Request (which the SPA denies).

The SPA's Position

37. The SPA indicates that it is unclear as to what aspect of Part 2 of the Law the Complainant's complaint relates to and does not consider that this is a valid ground on which the Complainant can found its appeal. In any event, the SPA denies that there was any deliberate attempt to misinterpret the Complainant's request if, indeed, that is what is suggested.

38. The SPA says that, in any event, it has now responded to the SPA's request.

The Commissioner's Determination

39. Part 2 of the Law places a number of obligations on a SPA including the duty to supply information (Art.8(b)), the duty to supply advice and assistance (Art.12) and the potential to seek additional details from an applicant "so that the authority may identify and locate the information" (Art.14).

40. The Commissioner notes the SPA's ultimate concession in the Internal Review that it misinterpreted the Complainant's Request. It did not request further details from the Complainant that may have assisted.
41. If a SPA cannot correctly interpret a request that has been received, then the SPA cannot (in the Commissioner's view) supply information (or not, as the case may be) or seek further details that may assist it to comply with its obligations. On the basis that the SPA acknowledges that assumptions were made and clarification was not sought as it could have been under Art.14 and the Commissioner does consider that the Complainant's appeal does fall within the scope of Art.46 of the Law.
42. The Commissioner does not consider that the wording used by the Complainant in their original Request to be particularly ambiguous. However, it is clear, and the SPA has acknowledged that it misinterpreted the Request and attempted to rectify the position in its Internal Review. It has also indicated that it has reviewed its internal procedures (including in respect of dealing with request for internal review).
43. The Commissioner does not uphold the Complainant's appeal in respect of Issue 2.
44. There are no steps the Commissioner orders the SPA to take in respect of Issue 2.

Issue 3

The Complainant's Position

45. The Complainant considers that the SPA essentially altered the initial request in that it 're-worded' certain parts of it and failed to reply to another.

The SPA's Position

46. The SPA denies the Claimant's assertions that it re-worded the request; rather the Complainant clarified their request. The SPA indicates that it is unclear as to what aspect of Part 2 of the Law the Complainant's complaint relates to and does not consider that this is a valid ground on which the Complainant can found its appeal. In any event, the SPA denies that there has been any re-wording of the Complainant's Request.

The Commissioner's Determination

47. The Commissioner has reviewed the correspondence passing between the Complainant and the SPA, together with the Initial Response and the Internal Review.
48. The Commissioner does not consider that that the SPA re-worded the request; the Complainant provided further information as part of the process and the SPA's understanding of the information sought by the Complainant changed.
49. The Commissioner does not uphold the Complainant's appeal in respect of Issue 3.
50. There are no steps the Commissioner orders the SPA to take in respect of Issue 3.

Issue 4

The Complainant's Position

51. The Complainant considers that the SPA has been unhelpful and evasive in their interactions with the Complainant.

The SPA's Position

52. The SPA denies the Complainant's assertion that they have been unhelpful and/or evasive in respect of their interactions either intentionally or otherwise. The SPA acknowledges that there was a misunderstanding on their part regarding the Complainant's request but that this does not mean that they have failed to provide advice and assistance as the Law requires.

The Commissioner's Determination

53. The Commissioner has considered the information provided and does not consider that there is evidence to suggest that the SPA has been deliberately unhelpful or evasive.

54. The Commissioner does not uphold the Complainant's appeal in respect of Issue 4.

55. There are no steps the Commissioner orders the SPA to take in respect of Issue 4.

Issue 5

The Complainant's Position

56. At the time of raising their Final Appeal, the Complainant indicated that they had still not received any response to Issue 5. This was couched in the Request, as follows:

"If periodic payments are to be made please state the planned frequency of these and whether excesses continue to apply to these".

The SPA's Position

57. The SPA acknowledged in its submissions to the Commissioner that a response to the Complainant's question was omitted from the Initial Response. The SPA notes that the Complainant did not refer to this omission in their IR Request but indicates that, in fact, the question was answered in the Internal Review.

58. However, and in any event, the SPA considers that this information is already in the public domain as such has been reported on extensively by the local press, as follows:

a. *"They will each get a lump sum and annual payments to cover those costs. Their lawyers aren't revealing the amount to protect the claimants' confidentiality.*

"I am pleased that agreement has been reached on a settlement that will fund appropriate lifetime care, and I hope this settlement provides these two young

people with the assurance that they will received all the specialist care they need." - Deputy Richard Renouf, Health Minister.¹

- b. *"However, yesterday Advocate Benest said that after closing arguments were heard and while the court was reaching its findings the parties had been able to reach an agreement which involved undisclosed PPOs and 'substantive' lump sums to both siblings.*

The PPOs will be used to pay for the siblings' ongoing 24-hour care which is likely to be for the rest of their lives, while the lump sum is a contingency fund for the future and also pays for general damages and the siblings' loss of earnings.

Following the hearing the JEP approached Advocate Benest to ask why the figures would not be disclosed.

He said: 'It is best that they [the plaintiffs] are allowed to move on and live their lives after what has happened to them with some degree of privacy.'

When Advocate Lee Ingram, defending, was asked about the settlement he would not be drawn on the amounts but only said the payments would not be coming from the public purse.²

- c. *"Although the amount for both the one-off payments and the annual payments were agreed by both parties, it was decided that the sums would not be mentioned in open court.*

After the hearing, Advocate Benest explained to Express that the decision was taken to "maintain confidentiality to protect the [siblings]", adding that it was a measure aimed at "protecting their future" and ensuring they have the "privacy to move on and live their lives."

Advocate Ingram added that the money for the pay-out would not come out of the public purse, but would not disclose the exact source of the money. Later, a States spokesperson confirmed to Express: "The States of Jersey's insurance arrangements will fully meet the settlement reached."³

- d. *"Each of the siblings – one of whom lives in a secure unit in the UK and the other in a 'highly supported environment' – will each receive a lump sum to pay for general damages and their loss of earnings. They will also each receive an annual payment –*

¹ <https://www.channel103.com/news/jersey-news/states-settle-abuse-victims-compensation/>

² <https://jerseyeveningpost.com/news/2018/12/06/multi-million-pound-child-abuse-case-settled/>

³ <https://www.bailiwickexpress.com/jsy/news/extraordinarily-damaged-siblings-settlement-kept-secret/#.XhMVEf7SUk>

known as a Periodic Payment Order – to pay for their care costs for the rest of their lives.”⁴

The Commissioner’s Determination

59. The Commissioner notes the SPA’s response as set out in the Internal Review, specifically:

“9.3 The FOI Law does not give a right to members of the public to ask Scheduled Public Authorities for points of clarification. The information to which you refer is already in the public domain, you said so yourself in respect of question 4. Therefore, you have not made a request for recorded information. Indeed, such confirmations are not held for the purposes of the FOI Law. You have actually asked us to create a response tailored to your questions.

9.4 On review, it is not necessary for us to maintain the exemptions applied because it is apparent that you have not specifically asked for recorded information outside of that which is already published. Furthermore, you simply seek confirmations that published information is correct, which is not information held by us in recorded form.”

60. Art.23(1) of the Law provides that *“Information is absolutely exempt information if it is reasonably available to the applicant, otherwise than under this Law, whether or not free of charge”* and further at Art.23(2) that *“A scheduled public authority that refuses an application for information on this ground must make reasonable efforts to inform the applicant where the applicant may obtain the information”*.

61. Whilst the Commissioner considers that the information forming part of Issue 5 was already in the public domain, the links that were subsequently provided by the SPA as part of the appeal process could very easily have been provided to the Complainant at the point of the Initial Response.

62. Accordingly, the Commissioner finds this aspect of the Complainant’s appeal to be partially upheld in that the SPA did not, in the Commissioner’s opinion, *“make reasonable efforts to inform the applicant where the applicant may obtain the information”*.

63. The Commissioner does not, however, require the SPA to take any steps in respect of Issue 5.

General comments

64. As previously indicated, the Commissioner has had sight of all the correspondence passing between the Complainant and the SPA. This includes the first request made by the Complainant to the SPA and the Initial Response, together with accompanying correspondence.

65. The Commissioner notes the Internal Review and, particularly, the fact that the SPA reclassified the Complainant’s Request as being for the purposes of seeking clarification of information that is in the public domain, rather than a request for information *per se*, and in accordance with Art.2 of the Law. The wholesale reclassification of the nature of the Complainant’s request and thus the lack of necessity in the reliance on any exemptions provided for by the Law that may

⁴ <https://jerseyeveningpost.com/news/2018/12/08/states-deeply-regrets-not-removing-siblings-from-damaging-environment/>

have been applicable to the Request clearly served to provide the Complainant with the impression that the SPA simply didn't wish to respond to his Request. Coupled with the SPA's failure to act on the IR Request in a timely fashion, the Commissioner understands the Complainant's frustration and why the Complainant was left with the impression that the SPA was not acting in compliance with the Law.

66. The points raised by the SPA in the Internal Review could easily have been dealt with at an earlier stage. The Complainant described the SPA's response as unhelpful and that such served only to suggest that the SPA was intentionally trying to withhold the Requested Information.
67. The Complainant refers to the answers received as being 'lamentable' and 'playing on words to evade providing straightforward answers is most unhelpful'. The Commissioner has some sympathy with the Complainant's views and can understand why the Complainant feels that way.
68. As noted in this office's previous decision notice⁵ at para.64 thereof, it may have been preferable to engage the Complainant at an earlier stage to try and understand exactly what was being asked. Indeed, the SPA acknowledges as much in its Internal Review:

"We fully accept that we should not have made an assumption about the information you were requesting at the outset, had we sought clarification from you at the time of your initial request, we may have been able to avoid this misunderstanding. We also accept that the delay in responding to your request for an internal review has further frustrated matters, when that could have been avoided. We shall reflect on our internal processes in order to avoid a situation like this arising again".

69. It is extremely important that assumptions are not made about information that is sought from an applicant. If there is any ambiguity or scope for interpretation of the request made, clarification should be sought at the earliest opportunity.

The Decision

70. The Commissioner's decision is that there are no further formal steps that the SPA is required to take. He does, however, hope that the SPA will consider the matters raised in this Notice regarding clarity of communication and take steps to ensure (insofar as they are able) that this type of situation does not arise in the future.

Right of Appeal

71. An aggrieved person has the right to appeal against this Decision Notice to the Royal Court of Jersey.
72. Information on how to do so can be found on www.jerseyojc.org.

⁵ 107345662

73. Any Notice of Appeal should be served within 28 (calendar) days of the date on which the Decision Notice is issued.

Dated this 4th day of June 2020

Signed

A handwritten signature in black ink, appearing to read 'Paul Vane', with a horizontal line underneath.

Mr Paul Vane
Deputy Information Commissioner
Office of the Information Commissioner
5 Castle Street
St Helier
Jersey

8 General right of access to information held by a scheduled public authority

If a person makes a request for information held by a scheduled public authority –

- (a) the person has a general right to be supplied with the information by that authority; and
- (b) except as otherwise provided by this Law, the authority has a duty to supply the person with the information.

9 When a scheduled public authority may refuse to supply information it holds

(1) A scheduled public authority may refuse to supply information it holds and has been requested to supply if the information is absolutely exempt information.

(2) A scheduled public authority must supply qualified exempt information it has been requested to supply unless it is satisfied that, in all the circumstances of the case, the public interest in supplying the information is outweighed by the public interest in not doing so.

(3) A scheduled public authority may refuse to supply information it holds and has been requested to supply if –

- (a) a provision of Part 3 applies in respect of the request;
- (b) a fee payable under Article 15 or 16 is not paid; or
- (c) Article 16(1) applies.

13 Time within which a scheduled public authority must deal with a request for information

(1) A scheduled public authority must deal with a request for information promptly.

(2) If it supplies the information it must do so, in any event, no later than –

- (a) the end of the period of 20 working days following the day on which it received the request; or
- (b) if another period is prescribed by Regulations, not later than the end of that period.

(3) However, the period mentioned in paragraph (2) does not start to run –

- (a) if the scheduled public authority has, under Article 14, sought details of the information requested, until the details are supplied; or
- (b) if the scheduled public authority has informed the applicant that a fee is payable under Article 15 or 16, until the fee is paid.

(4) If a scheduled public authority fails to comply with a request for information –

- (a) within the period mentioned in paragraph (2); or
- (b) within such further period as the applicant may allow,

the applicant may treat the failure as a decision by the authority to refuse to supply the information on the ground that it is absolutely exempt information.

(5) In this Article “working day” means a day other than –

- (a) a Saturday, a Sunday, Christmas Day, or Good Friday; or
- (b) a day that is a bank holiday or a public holiday under the Public Holidays and Bank Holidays (Jersey) Law 1951^[4].

18 Where a scheduled public authority refuses a request

The States may, by Regulations, prescribe the manner in which a scheduled public authority may refuse a request for information.

23 Information accessible to applicant by other means

- (1) Information is absolutely exempt information if it is reasonably available to the applicant, otherwise than under this Law, whether or not free of charge.
- (2) A scheduled public authority that refuses an application for information on this ground must make reasonable efforts to inform the applicant where the applicant may obtain the information

26 Information supplied in confidence

Information is absolutely exempt information if –

- (a) it was obtained by the scheduled public authority from another person (including another public authority); and
- (b) the disclosure of the information to the public by the scheduled public authority holding it would constitute a breach of confidence actionable by that or any other person.

33 Commercial interests

Information is qualified exempt information if –

- (a) it constitutes a trade secret; or
- (b) its disclosure would, or would be likely to, prejudice the commercial interests of a person (including the scheduled public authority holding the information).

34 The economy

Information is qualified exempt information if its disclosure would, or would be likely to, prejudice –

- (a) the economic interests of Jersey; or
- (b) the financial interests of the States of Jersey.