



JERSEY DATA PROTECTION AUTHORITY (JDPA)

**Meeting No. 35 of the JDPA Held at 5 Castle Street, St Helier, Jersey, JE2 3BT
on 20 August 2025, 16:10 – 19:30 (The Meeting)**

MINUTES

Attendees:

JDPA Members (collectively The Authority):

Elizabeth Denham (ED) – JDPA Chair (via video conference call)
Stephen Bolinger (SB) (via video conference call)
Paul Breitbarth (PB) (via video conference call)
Paul Routier (PR)
Paul Vane (PV) – Information Commissioner (non-voting)

Invitees:

Anne King (AK) – Operations Director, JOIC
Claire Le Brun (CLeB) – Finance Director, JOIC

Apologies:

None

JDPA Secretary:

Angela Marshall (AM)

1.0 Call to Order

The JDPA Chair called The Meeting to order.

APPROVAL

The Authority reviewed and approved the Meeting Agenda.

Business of the Meeting

Introductions

The JDPA Chair opened the Meeting, welcomed the Attendees and introductions took place.

The JDPA Chair noted that the Meeting was quorate.

The JDPA Chair gave a brief overview of the Meeting content.



1.1 Declarations of Interest

The JDPA Chair asked the Meeting Attendees if there were any new declarations of interest to note with it being confirmed that there were no new declarations of interest.

2 Items for Approval

2.1 Review and Approval of Minutes

The draft Minutes of Meeting No.34 of 21 May 2025 (the Draft Minutes) had been circulated to the Meeting Attendees for review prior to the Meeting being held.

The Meeting reviewed the Draft Minutes, requested minor amendment and after consideration were subsequently approved.

APPROVAL: The Draft Minutes of Meeting No.34 of 21 May 2025 were approved by the Authority.

3 Board Governance, Operations and Procedures

3.2 Audit and Risk Committee

PB on behalf of the Audit and Risk Committee (ARC) confirmed that an ARC meeting had taken place 28 July 2025 and proceeded to give an update on the matters that ARC had discussed which included:

The Meeting acknowledged that Helen Hatton's (HH) term as a Voting Member of the JDPA and Chair of ARC had concluded end of July 2025 and went on to express their thanks and appreciation for the valuable contributions, experience and dedication that HH had demonstrated during her tenure.

3.4 Q2 2025 Management Accounts

PB presented to the Meeting the JDPA Q2 Management Accounts to 30 June 2025 (the Q2 2025 Management Accounts) and gave an overview of same with the following being noted:

In line with the reduction of funding for 2025 from Government of Jersey (GoJ), a carefully maintained approach to finances had been applied with cost controls continuing to be maintained across the operating budget to ensure spending remains aligned with planned deliverables for the year and strategic priorities.

The deferral of staff recruitment for vacant roles over 2024 and 2025 had continued to enable cost savings with it being acknowledged that this was not ideal. It was agreed to monitor the situation for any impact on day-to-day operational activities.

Going forward, the aim is to continue to monitor expenditure closely to ensure funds are utilised where needed most, maintaining both financial prudence and operational effectiveness.

ARC is recommending the Q2 2025 Management Accounts to the Authority.

APPROVAL: The Q2 2025 Management Accounts were approved by the Authority.

3.6 Reserve Report

CLeB presented the Structure of Reserve Report 2025 (the Reserve Report 2025) outlining its primary aim was to aid informed discussion around whether current financial reserves are appropriately structured. The Reserve Report 2025 also included review of existing reserve categories and their intended purpose with it being noted that the current operating reserve is set at three months.

After consideration the Authority agreed to maintain the current reserve structure and that the operating reserve should remain at the three-month level for the time being.

Internal Control Policies

3.7a Breach Log Policy For Financial Internal Controls (Draft)

CLeB referred to the draft document Breach Log Policy for Financial Internal Controls (the Draft Breach Log Policy For Financial Internal Controls) explaining that it sets out the financial control framework currently in place and the procedures for identifying and reporting breaches. Its purpose is to ensure alignment between the Audit and Risk Committee (ARC) and Finance Operations enabling the ARC Chair to confidently confirm, during the audit process, awareness and understanding of the operational controls in place, setting out a comprehensive framework of internal financial controls.

ARC is recommending the Draft Breach Log Policy For Financial Internal Controls to the Authority.

APPROVAL: The Draft Breach Log policy For Financial Internal Controls was approved by the Authority.

3.7b Financial Internal Controls Policy (Draft)

CLeB referred to the draft document Financial Internal Controls Policy (the Draft Financial Internal Controls Policy) and gave an overview of same detailing that its purpose was to set out the framework of internal financial controls explaining its purpose was to set the internal governance framework around the recording of financial transactions which would help in facilitating the preparation of financial reports in accordance with applicable legislation.

Following review of the Draft Financial Internal Controls Policy the Authority requested amendment.

ACTION: CLeB to amend the Draft Financial Internal Controls Policy and it be put forward for review at a later date.

3.8 Governance, Remuneration and Human Resources Committee

PR as chair of the Governance, Remuneration and Human Resources Committee (G, R & HR) confirmed that the newly amalgamated G, R & HR Committee had held their meeting on 29 July 2025 and proceeded to give an update on the matters that had considered which included:

JDPA Succession Planning

PR confirmed that following the completion of a robust recruitment drive in respect of enlisting a new JDPA Voting Member, GoJ had confirmed the appointment of Tom Noel as a Voting Member of the JDPA and that his term would commence 01 September 2025 to 31 August 2029.

The Meeting went on to discuss the induction process for new JDPA Voting Members.

It was also noted that GoJ had approved the extension of PR's term as a Voting Member of the JDPA effective from 01 August 2025 to 01 February 2027.

JDPA PERFORMANCE REVIEW: It was noted that a Performance Review of the JDPA would become due towards the end of 2025 with it being agreed to initiate the process.

ACTION: PR to consult with external HR Manager in respect of initiating JDPA Performance Review.

4 Information Commissioner

PV as Information Commissioner gave an update on topics that he had been attending to which included:



4.1 Strategic Plan 2025 – 2028

PV spoke of the draft strategic plan, the purpose of which is to set a framework of aims and projects to be undertaken by JOIC over the next three years (2025 - 2028) to run alongside the statutory regulatory work that JOIC undertakes. PV presented the draft JDPA Strategy 2025 – 2028 (Draft Strategic Plan 2025 – 2028), highlighting the three main themes of focus.

The Meeting went on to review and consider the Draft Strategic Plan 2025 – 2028, giving thought as to how it would be implemented and the overall potential benefits. Some minor changes were requested with PV confirming he would attend to same and re-circulate the updated Draft Strategic Plan 2025 – 2028 for Authority consideration and approval.

4.2 Quarterly Report

PV noted that the Information Commissioner's Quarterly Report, August 2025 (the Quarterly Report) had been circulated to the Meeting for information and review. PV went on to give an overview of the Quarterly Report touching upon various content which included a recap and update of JOIC business plan deliverables, organisational development and on-line harms.

IT Controls

PV confirmed that in accordance with the delegated powers as set out in law, the Authority had delegated the responsibility of IT controls and oversight to the Information Commissioner. It is further confirmed that robust controls, policies and procedures are firmly established and in place to effectively oversee the systems and data.

Fee Model

PV gave a verbal update in respect of the continued work that had taken place in respect of the alternative fee model project, outlining the options being considered. PV gave examples of how could work along with comparison to similar organisations and regulatory bodies.

It was acknowledged that communications with GoJ regarding an alternative fee model are continuing and PV would provide further update at a later date.

Value for Money GoJ Review

PV referred to an external value for money review that had been commissioned by GoJ to be undertaken on JOIC noting that the results had not as yet been received.

4.3 Appeals Process

The Meeting considered appeals process concerning JOIC DPO decisions and service quality in the event of a complaint being received. It was noted that the Data Protection (Jersey) Law 2018 is silent on this matter and in the absence of particular provision, given the JDPA remains separate and independent from JOIC, should such complaints be received the JDPA is the appropriate body to undertake review.

5 Any Other Business

It was confirmed that the next JDPA meeting was scheduled for November 2025.

The Meeting ended at 19:30

The Authority held an in-camera session.



Elizabeth Denham, Chair
For and on behalf of: JDPA