



## States Greffe

Deputy Kristina Moore  
Chief Minister

Cc  
Deputy Kirsten Morel  
Deputy Chief Minister

### **BY EMAIL**

10th August 2023

Dear Chief Minister,

#### **Draft Register of Names and Addresses (Amendment) (Jersey) Law 202-**

Noting the relation of the Draft Register of Names and Addresses (Amendment) (Jersey) Law 202- ([P.56/2023](#)) to financial services, the Economic and International Affairs Scrutiny Panel has been considering the proposed legislation. The Panel has a series of questions and would be grateful if clarification can be provided on the following points:


1. Consultation on the draft legislation is being undertaken concurrently to P.56/2023's lodging period. Could further explanation of this timing be given?
  - a. Noting that the accompanying report identifies that responses to the consultation received during July have been broadly positive, should any issues be identified how will they be rectified given an amendment deadline only 4 days after the consultation closes?
  - b. How will feedback to the consultation be shared with Scrutiny?
2. What credit reference agencies have been consulted with and are these satisfied with the final proposals in P.56/2023?
  - a. Have any additional organisations, such as banks, been contacted as part of the consultation?
3. It is proposed that prescribed credit reference agencies will be able to receive individual's name, residential address and date of birth. Is this sufficient information for these agencies to undertake their checks effectively?
4. Is the Register of Names and Addresses sufficiently maintained to provide the required information?
5. Should P.56/2023 be adopted, how long is it anticipated to see an impact in the facility of services by credit reference agencies, and subsequent provision credit cards etc.?

6. How will the administrative fee be set and what will revenue be used for?
7. Why is customer due diligence included within P.56/2023 noting Anti-Money Laundering and Counter Terrorist Financing (“AML/CFT”) checks undertaken irrespective of the access to the information held in the Register of Names and Addresses?
8. In view of the potential reputational risk to the Island, what safeguards will be in place to protect individual's information from misuse or unintentional disclosure e.g. hacking by a third party?
  - a. Will the information only be accessed upon the agreement of the individual e.g. they have requested a credit check, or will it be shared for additional use e.g. analysis of credit ratings for groups of islanders or the island as a whole?

We would be grateful if you could respond to this letter no later than Thursday 17th August 2023 in line with the 5 working days approved for responses between Scrutiny Panels and Ministers.

If you have any questions regarding this or our work in general, please do not hesitate to contact me. Please note that unless otherwise stated, all letters will be uploaded to the Scrutiny website as a matter of course.

Yours sincerely,



Deputy Moz Scott  
**Chair**  
**Economic and International Affairs Scrutiny Panel**