



Chamber House, 25 Pier Road, St. Helier
Jersey, Channel Islands, JE2 4XW.

Tel: 01534 724536

Website: www.jerseychamber.com

25 Pier Road
St Helier
Jersey
JE2 4WX

Wednesday 21st May 2025

**Submission to the Environment, Housing and Infrastructure Scrutiny Panel
Re: Draft Residential Tenancy (Jersey) Amendment Law 202- (P.24/2025)**

The Chamber of Commerce's Employment & Skills Committee welcomes the opportunity to comment on the above draft legislation and would like to thank the Minister for Housing and Communities for the opportunity to engage directly with him on this topic. We were pleased to attend a recent meeting with the Minister to discuss the proposed changes and were impressed by the open and constructive tone of the discussion.

Following our review of the draft law, we wish to offer the following feedback, particularly from the perspective of employers who provide staff accommodation – a practice that remains critical in supporting sectors such as hospitality, agriculture, and healthcare.

1. Clarity on Self-Contained vs Non-Self-Contained Accommodation

We welcome the amendment's intent to clarify that the Residential Tenancy Law applies only to self-contained accommodation. However, we would strongly recommend that clear and practical guidance be published alongside the legislation to help landlords and employers understand how this definition will be interpreted in practice.

Through anecdotal feedback from a large Chamber member, we are aware that current assessments of "self-contained" accommodation can be highly inconsistent. For example, we have heard that the presence of a microwave in what is otherwise clearly non-self-contained accommodation (e.g. a shared room with communal kitchen and bathroom facilities) has led to a determination that the unit is self-contained.

This kind of interpretation has real implications for employers. It may deter them from offering basic amenities to their staff for fear of unintentionally triggering legal obligations designed for formal tenancies. Such uncertainty creates risk and may undermine efforts to provide adequate and dignified housing for employees.

We therefore urge the Panel to recommend:

- The publication of clear, operational definitions of 'self-contained' and 'non-self-contained' accommodation, including examples.
- A commitment from the Minister to consult with employers and housing providers in developing these definitions, to ensure they are fit for purpose.
- Consideration of objective criteria (e.g. access to exclusive cooking, sanitation, and sleeping facilities) rather than reliance on the presence of individual appliances or furniture items.

2. Staff Accommodation as a Unique Context

While we accept that staff accommodation provided in the form of a self-contained unit may fall within the scope of the Law, we believe it is important to acknowledge that employer-provided housing often forms part of a wider employment arrangement. This includes temporary, seasonal, or rotating housing models that may not fit easily into the framework designed for residential tenancies in the private rented sector.

We encourage the Panel to consider whether additional guidance or legislative clarity is required for employer-provided accommodation, especially where housing is tied to employment and not available to the public.

We would be happy to provide further information or facilitate input from Chamber members with direct experience of providing staff accommodation.

Regards,

Anna Norton

Chair, Employment & Skills Committee

Jersey Chamber of Commerce