

**PAN-ISLAND**  
COMMISSIONER  
FOR STANDARDS



Commissioner for Standards Annual Report 2025, Jersey

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# 1 Introduction

- 1.1 This is my third report since taking up the role of Pan-Island Commissioner for Standards in March 2023.
- 1.2 This report is submitted in accordance with Part 3 Paragraph 12 of the Commissioner for Standards (Jersey) Law 2017. It provides information on complaints received in Jersey from 1st January 2025 to 31st December 2025 including analysis of the number of complaints, summary of completed investigations, resources associated with the Office and other work carried out during this year.

## 2 Functions of the Commissioner

- 2.1 The functions of the Commissioner are set out in Part 3 Paragraph 9 of the Commissioner for Standards (Jersey) Law 2017 and may be summarised as follows:
  - to investigate a complaint to the Commissioner that, at a relevant time, a breach of a code as in force at that time occurred;
  - to initiate an investigation if the Commissioner believes that, at a relevant time, a breach of a code as in force at that time may have occurred;
  - to report to the PPC on the outcome of any investigation;
  - on the Commissioner's own initiative or, if requested by the PPC, to give advice on any matter relating to standards of conduct of elected members of the States or standards of conduct and practice of Ministers and Assistant Ministers, including proposals to change a code;
  - if requested by the Chief Minister, to give advice on any matter relating to standards of conduct and practice of Ministers and Assistant Ministers, including proposals to change the code referred to in paragraph (b) of the definition "code".
- 2.2 Part 3 Paragraph 11 of the Commissioner for Standards (Jersey) Law 2017 states that "The Commissioner shall make and publish a statement of the manner in which he or she proposes to discharge his or her functions under this Law and any other enactment".
- 2.3 In accordance with the 2017 legislation, all investigations are carried out in accordance with the processes contained in the Statement.

### 3 Complaints Overview

- 3.1 A total of 19 complaints were received during the 2025 reporting period up to 31 December 2025. Of the 19 complaints received, 6 were admissible (32%), while 13 complaints were inadmissible (68%).

**Table 1. Complaints overview 2025**

|  | <b>2023</b> | <b>2024</b> | <b>2025</b> |
|--|-------------|-------------|-------------|
| Complaints submitted                                     | 17          | 13          | 19          |
| Complaints made by member of public                      | 7           | 10          | 18          |
| Complaints made by a Member, Minister/Assistant Minister | 10          | 3           | 1           |
| Inadmissible   | 9           | 10          | 13          |
| Admissible   | 8           | 3           | 6           |
| Discontinued   | 0           | 0           | 0           |
| Ongoing  | 2           | 2           | 1           |

- 3.2 Of the 19 complaints received, 95% were submitted by members of the public against Members or Ministers. One complaint (5%) was submitted by a Member against another Member.
- 3.3 In total, I considered 95 allegations contained within the 19 complaints received. Of these, 4 complaints were against Ministers (comprising 8 allegations) and 16 complaints were against Members (comprising 87 allegations).
- 3.4 One investigation was temporarily suspended. An update will be presented, in summary form, in next year's Annual Report.
- 3.5 I successfully carried out preliminary assessments of all complaints and full investigations through remote interviewing, obtaining legal advice where necessary.

## 4 Investigation Report Summaries

**4.1** I conducted 3 investigations this year resulting in 2 reports with one ongoing. One report related to four complaints into the same matter made against Deputy Philip Ozouf. One report was related to a complaint made by a Member (Deputy Mézec) against another Member (Deputy Warr), and one has been suspended and will be included in next year's report.

### **4.2 Deputy Philip Ozouf**

Four complaints I received concerned a traffic incident on 2 November 2024, when Deputy Ozouf was stopped by police for driving at 31mph in a 15mph zone and without displaying a valid motor insurance disc. He was issued with three summonses to attend a Parish Hall Enquiry, which he failed to attend, and the matter was subsequently referred to the Magistrate's Court. On 11 February 2025, he was fined £575.

Complaints were made alleging breaches of paragraphs 2, 3, 4 and 5 of the Code of Conduct. Following an initial lack of engagement, an investigation commenced in March 2025, and Deputy Ozouf was interviewed in May 2025. He did not dispute the facts, acknowledged his failures, and offered apologies to both the court and the States Assembly.

While Deputy Ozouf cited mitigating personal circumstances, elected Members remain accountable for complying with the law and engaging appropriately with formal processes. On the evidence, it was concluded that Deputy Ozouf breached paragraphs 2, 3, 4 and 5 of the Code of Conduct

### **4.3 Deputy David Warr**

This report concerns an investigation into a complaint made by Deputy Sam Mézec on 12 August 2025 against Deputy David Warr. The complaint alleged that Deputy Warr breached Parts 3 and 5 of the Code of Conduct by publishing statements said to be untrue and by making repeated claims about Deputy Mézec's voting record that were alleged to be disrespectful and damaging to his reputation.

Deputy Warr stated that he believed his comments to be accurate and explained that his LinkedIn post was intended to highlight what he saw as a change in Deputy Mézec's position during the Bridging Island Plan debates in 2021–22, particularly in relation to rezoning greenfield sites.

The investigation concluded that Deputy Warr's comments amounted to political discourse rather than knowingly false statements. In light of the enhanced protection afforded to political expression under Article 10 of the European Convention on Human Rights, and noting that the wording was amended following challenge and that both Members had equal opportunity to respond, it was determined that the Code of Conduct had not been breached. Accordingly, it was found that Deputy Warr did not breach Parts 3 or 5 of the Code of Conduct.

## 5 Other Work

- 5.1 In addition to considering all in-year complaints and carrying out investigations, I also attended meetings, provided advice to members when requested and contributed to internal and external consultations.
- 5.2 In May 2025, I contributed to the PPC's Code of Conduct review and attended sessions in Jersey with Members and the States Greffier.
- 5.3 Throughout the year, I complied with the Code governing my conduct and registered all relevant financial and other interests and all hospitality received.
- 5.4 I was provided funding through Jersey and Guernsey to undertake the executive LSE course: AI: Law, Policy and Governance.

### **Overview and relevance of AI: Law, Policy and Governance course**

- 5.5 The LSE course is relevant to the Commissioner for Standards role as artificial intelligence is increasingly shaping how public officeholders communicate, make decisions, and discharge their responsibilities. As AI-enabled tools are adopted across the public sector, questions of accountability, transparency, and ethical judgment which are core to standards oversight are becoming more complex. Drawing on international frameworks such as the OECD AI Principles and developments under the EU AI Act, it supports alignment with global best practice.
- 5.6 Existing Codes of Conduct were largely developed for human decision-making and do not yet fully address the ethical risks associated with automated or AI-assisted systems, including opacity, bias, scale of harm, and the delegation of judgment. The course helps to equip a Commissioner with the conceptual and regulatory frameworks needed to interpret and apply established principles such as integrity, accountability, openness, and leadership in an AI-mediated context, and to advise on proportionate updates to standards frameworks.
- 5.7 AI also presents new challenges for standards investigations, including assessing the authenticity of evidence, determining authorship and intent, and distinguishing between negligence, recklessness, and misuse where AI tools are involved.
- 5.8 The course strengthens the ability of the Commissioner to evaluate AI-related evidence fairly, safeguard procedural justice, and maintain confidence in investigative findings.

## 6 Resources

- 6.1 The Commissioner is paid a daily rate of £500 per day. Table 2 shows a breakdown of the costs for 2025.

Table 2. Commissioner's Pay Jersey 2025

|                                   | 2023          | 2024          | 2025          |
|-----------------------------------|---------------|---------------|---------------|
| Casework                          | 13,000        | 12,500        | 6,750         |
| Investigations and report writing | 10,250        | 2,500         | 6,250         |
| Administration                    | 6,500         | 6,500         | 4,750         |
| Jersey Visit                      | 3,750         | 0             | 2,000         |
| CPD                               | 0             | 0             | 968           |
| <b>Total</b>                      | <b>36,500</b> | <b>21,500</b> | <b>20,718</b> |

- 6.3 Total cost for investigation, casework and report writing was £13,000.
- 6.4 The Commissioner's pay in 2025 was similar to the previous year.
- 6.5 Administrative costs relate to general meetings, letters of advice, emails, responding to consultations, website, WorkPro (complaints software), and other administrative issues arising.

## 7 Acknowledgements

I am grateful to all of those who have provided me with assistance and support over the past year including Lisa Hart, Will Millow, Casey Tucker and Eva Patterson. I have also been fortunate to have had support from Standards Commissioners across the UK for which I am extremely grateful.



Dr Melissa McCullough  
Pan-Island Commissioner for Standards  
30 January 2026

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The Commissioner for Standards can be contacted by email at:  
[commissioner@pi-cfs.org](mailto:commissioner@pi-cfs.org)

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