



**PORTS OF JERSEY**  
YOUR ISLAND GATEWAY

**Ports of Jersey's Response to Initial  
Notice of Direction to Report  
Information to the JCRA**

**January 2018**

# Ports of Jersey's Response to Initial Notice of Direction to Report Information to the JCRA

## Introduction

Ports of Jersey welcomes the opportunity to respond to CICRA's Initial Notice of Direction to report information to the JCRA<sup>1</sup>.

We recognise the importance of providing information to passengers that helps them to plan and undertake their journey and we are currently upgrading our IT systems to allow us to improve the information available and provide it on platforms that are most convenient for customers, for example via apps on their smartphones. We also recognise the interest of CICRA and other stakeholders in information relating to the performance of the airport, harbours and marinas in Jersey.

We welcome the recognition by CICRA that parties other than POJL have an important role to play (in many cases the prime role) in delivering many of the services that underpin the performance of the ports in Jersey and that airlines, ferry operators, freight operators and others are needed to deliver these services. Annex A sets out our view of which parties influence the measured outputs and which party has prime responsibility.

However, we are concerned that CICRA have proceeded directly to an Initial Notice to issue a direction under the port operations license without engaging with POJL, considering what is practical and sensible to measure or gathering an appropriate evidence base to support their proposals, despite their stated intention to do so<sup>2</sup>. Whilst CICRA provided POJL with an overview of the feedback from their market research, we had anticipated that that data would be made available to enable us to discuss the results in the light of our already extensive customer feedback mechanisms and to help develop proposals that are practical and sensible to implement.

As a result their suggestions are less likely to reflect the value that all of our customers place on aspects of quality and delivery of our services or be easily benchmarked with other port operators and will place a disproportionate cost on the ports or simply be impossible to measure. Some outputs may be better assessed by surveys of customer satisfaction rather than reporting operational metrics. We have set out some initial thoughts on measures that CICRA have proposed and some alternatives that we believe would be more appropriate, but we do urge CICRA to take up our offer to speak to us and discuss their ideas fully before finalising any formal licence-based Direction.

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<sup>1</sup> CICRA 17/34 <https://www.cicra.gg/media/597760/poj1224j-initial-notice-quality-of-service-performance-measures.pdf>

<sup>2</sup> "This [a report summarising the responses CICRA receives to its consultation and its supplementary engagement] will form the basis for discussions with POJL to set in place appropriate performance measures" CICRA 17/11, <https://www.cicra.gg/media/597591/poj1224j-consultation-ports-of-jersey-quality-of-service.pdf>

## Transparency of the evidence used by CICRA to support the Initial Notice

CICRA has based their Initial Notice on evidence provided by their quality of service consultation and market research in order to try to identify issues that are of importance to customers and port users.

In terms of transparency, CICRA has not published the responses to their consultation - despite our request and their stated intention to do so<sup>3</sup>. CICRA have also not published the details of their market research in particular the size and composition of the group surveyed and therefore the reliability of the findings, again despite our request for them to do so. We note that their market research took no account of the views of over 60% of passengers who are visitors to Jersey rather than being resident here.

Without publication of this information, it is impossible for stakeholders to assess the extent of the CICRA research or whether they have selectively quoted from their evidence base. We have particular concerns in this area given the findings quoted in the Initial Notice. For example CICRA report that "*there was concern over availability of seating [at the airport]*", however our much larger airport customer satisfaction survey<sup>4</sup> reported 97% customer satisfaction with sufficient seating at the airport. Similarly, the CICRA market research finds: "*Particular issues raised included the lack of availability of cash machines in arrivals (where they are needed by arrivals / visitors)*", when in fact there is an ATM cash machine in the Arrivals Terminal (as well as two in the Departures Lounge)<sup>5</sup> – this was also noted in our consultation response. It is particularly concerning that despite providing a wide range of information in our consultation response, CICRA have chosen to ignore this in their summary of their evidence base in the Initial Notice.

We would urge CICRA to publish the responses to their Quality of Service consultation and the details of their market research evidence so that POJL and other stakeholders are able to understand how various conclusions have been drawn from the CICRA data. Some of the feedback provided by CICRA is consistent with feedback POJL has received through our extensive feedback mechanisms, however some appears at odds with our information - for example, providing award winning facilities does not seem to feature.

Transparency is important because it allows stakeholders (including POJL) to better understand the regulator's proposals (such as are contained in the Initial Notice), make more informed and therefore better responses to regulatory proposals and is one of the five Principles of Good Regulation<sup>6</sup>.

## Evidence necessary to support regulatory reporting requirements

We recognise the value in providing customers, operators and other stakeholders with information about the performance of the air and sea ports and marinas in Jersey, (and intend to extend the

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<sup>3</sup> "*In line with its consultation policy, CICRA intends to make responses to the consultation [on POJL Quality of Service] available on its website*", CICRA 17 / 11

<sup>4</sup> Jersey Airport customer satisfaction survey, April-June 2017, see Annex B2 of POJL response to the CICRA consultation on Quality of Service

<sup>5</sup> Towards the end of 2016 Ports of Jersey sought public views as to the need for an ATM machine in the arrivals terminal and as a result of feedback, decided to introduce and operate one, despite other providers being unwilling to provide this service because of the low volume of transactions made

<sup>6</sup> Better Regulation Task Force, December 1997 (revised October 2000), Principles of Good Regulation

range of information about the ports published on our website). However we are concerned that CICRA's proposed measures have been created without sufficient or appropriate supporting information and that CICRA have not gathered a sufficiently robust evidence-base on which to base an important regulatory determination<sup>7</sup>. Regulatory best practice as espoused by the CAA in their regulation of Heathrow is clear that "*output-based service quality regulation should be informed by **robust** consumer research*"<sup>8</sup>. The CAA are also clear that "*we remain of the view that the industry – rather than the regulator – is best placed to take responsibility for engaging with customers, gathering evidence on what they value, and translating this engagement into appropriate outcomes which can be incorporated in to the regulatory regime*"<sup>9</sup>.

The evidence that CICRA have gathered (from their consultation and market research) does not appear to have been very relevant to determining their proposed set of reporting measures<sup>10</sup> and CICRA appear to have ignored important comments that we made in our response that would have improved their proposals. As a result it is not at all clear that there is any substantive evidence that the proposed reporting measures are of importance to customers or port users – which was CICRA's aim in developing them.

CICRA would like to use the reported measures to compare POJL's performance against other port operators<sup>11</sup> (which we would support if the comparison is objective and consistent). However, they have not considered the measures of performance published by other port operators - which is necessary to allow comparability with those proposed for POJL. For example: if POJL report the number of flights for which the final bag is delivered to the carousel > 15 minutes after arrival, but other ports measure the number of flights for which the final bag is delivered to the carousel >20 minutes after arrival; or if POJL report a different measure of an aspect of performance to other port operators, then the measures will not be comparable and the information reported will be much less useful.

Evidence of the performance measures reported by other port operators would also reflect what they believe their customers and users value – which are likely to be a good proxy for what POJL's customers and users value and so help to achieve another of CICRA's aims for performance measurement.

We highlighted in our response to the quality of service consultation the importance of considering measures and processes undertaken by other air and sea ports to measure and report on service performance. We remain ready to work with CICRA to undertake such a survey to inform the

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<sup>7</sup> Our consultation response warned that: "*we urge caution in developing regulatory policy solely from this initial consultation, as we are doubtful that it provides enough substance for consultees to make meaningful observations to inform regulatory policy*".

<sup>8</sup> CAA design principles for moving towards outcome-based service quality regulation, CAA, December 2016, paragraph 6.2 <https://publicapps.caa.co.uk/docs/33/CAP%201476%20DEC16.pdf> (emphasis added)

<sup>9</sup> Ibid. paragraph 6.4

<sup>10</sup> CICRA 17/34 "*Given the range of information and services of importance identified it would be difficult to identify specific performance measures to address each. Many of the areas [identified by the market research] are best suited to development and monitoring through appropriate customer satisfaction measures*"

<sup>11</sup> See CICRA Strategic Objectives and 2018 Draft Work Programme, Consultation on the Economic Regulation of Jersey Harbours and Airport <https://www.cicra.gg/media/597749/g1347gj-consultation-ports-strategic-objectives-and-2018-work-programme.pdf>

development of performance measures that better support benchmarking with those other port operators.

We also highlighted that it is important for CICRA to consider what information is readily available from POJL's existing information systems and what information might be difficult or disproportionately costly to obtain. In particular, asking for information retrospectively (from 1<sup>st</sup> January 2018) when some of that information is not currently captured by POJL, makes regulatory compliance difficult or impossible to achieve. In addition, some of the information is measured and collected by third parties, including airlines, ground handlers and ferry operators. While we are prepared to request that they provide us with this information (which we could then report to CICRA), we currently have no contractual means of requiring them to provide the information. We do not think it appropriate to include this as a licence obligation which we could potentially be in breach of due to the failure of those third parties to provide the correct information in a timely manner.

POJL is happy to work with CICRA to discuss what information is currently or could relatively easily be captured by our information systems in order to ensure that the information requirements and reporting obligations are proportionate<sup>12</sup>.

CICRA stated that they would "*prepare a report summarising the responses it receives to the consultation and its supplementary engagement, setting out what respondents have identified as the most important factors in POJL's quality of service and what types of performance measures they would like to see in place for the future*"<sup>13</sup>, we are disappointed that CICRA have not done this.

As we have previously stated in our response to CICRA's consultation on quality of service, we stand ready to work with CICRA to provide a better, more customer-focussed and more appropriate set of measures that reflect the value that customers place on aspects of quality and delivery of our services, can be benchmarked with other port operators and do not place disproportionate costs on the business. We have set out some of our thoughts in this consultation response, but believe that a closer dialogue would be much more effective. We believe that this would be better for port users and customers and more in line with CICRA's aims and good regulatory practice.

### **The Proposed Reporting Measures**

The tables below summarise our suggestions regarding the proposed performance measures. Our response does not take account of information about performance measures reported by other similar port operators, which the consultation period has not provided sufficient time to research. Such research may suggest other, more appropriate performance measures and we will help CICRA to carry out further research and develop a more robust evidence base before any decision is made on reporting requirements. Some outputs may be better assessed by surveys of customer satisfaction rather than reporting operational metrics. However, we also feel it is important to make a start with a set of measures and believe that our proposed adjustments could be a good starting point that can be fine-tuned with our customers and CICRA.

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<sup>12</sup> Proportionality is also a Principle of Good Regulation

<sup>13</sup> CICRA 17/11

**Table 1: Airport reporting measures**

Proposal in Initial Notice	POJL proposal
<b>Punctuality of flights to and from Jersey Airport</b>	
Departures: Number of flights departing within 15 minutes of scheduled time	Departures: Proportion of flights departing within 15 minutes of scheduled time [excluding due to weather]
Departures: Number of flights cancelled	Departures: Proportion of flights cancelled [excluding due to weather]
Arrivals: Number of flights arriving within 15 minutes of scheduled time	Arrivals: Proportion of flights arriving within 15 minutes of scheduled time [excluding due to weather]
Arrivals: Number of flights cancelled	Arrivals: Proportion of flights cancelled [excluding due to weather]
<b>Availability of Airport Stands</b>	
Percentage of flights for which airport stands are available on arrival	Percentage of time when airport stands are available
Percentage of flights for which the wait for a stand is >15 mins	
<b>Time for passengers to clear security</b>	
Percentage of time for which the queueing time to clear security is 5 mins or less	
Percentage of time for which the queueing time to clear security is 15 mins or less	Percentage of time for which the queueing time to clear security is 15 mins or less
Percentage of time for which the queueing time to clear security is 30 mins or less	Percentage of time for which the queueing time to clear security is 30 mins or less
<b>Time taken to unload luggage</b>	
Number of flights for which final bag is delivered to carousel >15 minutes after arrival	Percentage of flights for which final bag is delivered to carousel >20 minutes after arrival
Number of flights for which final bag is delivered to carousel >35 minutes after arrival	Percentage of flights for which final bag is delivered to carousel >45 minutes after arrival
<b>Response to issues and complaints raised</b>	
No Proposal	No. of airport issues / complaints raised
No Proposal	No. of airport issues / complaints closed in 10 days or less
No Proposal	No. of airport issues / complaints closed in 20 days or less
No Proposal	No. of airport issues / complaints closed in more than 20 days

**Table 2: Harbour reporting measures**

Proposed in Initial Notice	POJL proposal
<b>Punctuality</b>	
Departures: Number of sailings departing within 15 minutes of scheduled time	Proportion of sailings subject to moderate delay events*
Departures: Number of sailings cancelled	Proportion of sailings subject to material delay events*
Arrivals: Number of sailings arriving within 15 minutes of scheduled time	Proportion of sailings subject to cancellation events*
Arrivals: Number of sailings cancelled	
<b>Availability of Berths</b>	
Percentage of arriving vessels for which suitable berths are available on arrival	Percentage of time when berths are available
<b>Time for passengers to clear security</b>	
Percentage of time for which the queueing time to clear security is 5 mins or less	No reporting measure

Percentage of time for which the queueing time to clear security is 15 mins or less	No reporting measure
Percentage of time for which the queueing time to clear security is 30 mins or less	No reporting measure
<b>Passenger boarding / disembarkation</b>	
Number of sailings for which last passenger disembarkation is >15 minutes after arrival	No reporting measure
<b>Response to issues and complaints raised</b>	
No Proposal	No. of harbour issues / complaints raised
No Proposal	No. of harbour issues / complaints closed in 10 days or less
No Proposal	No. of harbour issues / complaints closed in 20 days or less
No Proposal	No. of harbour issues / complaints closed in more than 20 days

\* We suggest aligning to the definitions contained in the Condor Operating Agreement for all of the sailings.

**Table 3: Marinas and Moorings reporting measures**

Proposed in Initial Notice	POJL proposal
<b>Availability of infrastructure</b>	
Waiting time for new berths	Number of customers waiting for a new berth (by size and location)
No of days when key infrastructure is not available Infrastructure availability = (no of days available/365) x 100%	No reporting measure
<b>Response to issues and complaints raised</b>	
No. of issues / complaints raised	No. of marina issues / complaints raised
No. closed in 10 days	No. of marina issues / complaints closed in 10 days or less
No. closed in 20 days	No. of marina issues / complaints closed in 20 days or less
No. closed in more than 20 days	No. of marina issues / complaints closed in more than 20 days

## Discussion of proposed measures

### 1 Airport punctuality

The percentage, rather than the number of flights arriving and departing on time or within 15 minutes of the scheduled time is a better measure of punctuality, since the number of scheduled flights varies significantly across the year and therefore comparisons of quarterly numbers of flights that are delayed would be a meaningless statistic. Measuring the percentage would also facilitate comparison with other airports with different numbers of flights and different scheduling patterns across the year.

CICRA should note that Jersey airport punctuality information is already collected and published together with considerable additional information (including average delay, over 1 hour late, over 3 hours late, analysis by scheduled airlines) and compared to 23 other UK airports and the UK airport average at [www.flightontime.info](http://www.flightontime.info).

CICRA's assertion that the punctuality of arriving and departing flights permits some view of turnaround times and the effectiveness of port operations is partially true, the principle reason for delays and cancellations is due to weather, the aircraft/airline or other factors that are outside the airport's responsibility and have little to do with port operations (the airport does not cancel flights). This is the reason that the CAA do not monitor or incentivise Heathrow in relation to flight delays or cancellations<sup>14</sup>. This can be seen in the punctuality data which show a wide variation by airline, whereas if airports were primarily responsible for punctuality, one would not expect significant differences between airlines since they would all be affected by the same airport performance. We are looking into the practicality of capturing this information excluding the impact of weather delays (and separately measuring delays and cancellations due to weather); if this is possible, we would suggest that the reported measure excludes the impact of the weather which is clearly outside the control of the airport.

It is worth noting that since there are very few if any cancellations when an aircraft is actually in Jersey, the number of arriving flights cancelled almost always equals the number of departing flights cancelled.

## **2 Availability of Airport Stands**

We are not able to capture information the percentage of flights for which airport stands are available on arrival or the percentage for which the wait is greater than 15 minutes, since we do not track aircraft waiting times for a stand as there is usually high availability. We therefore propose reporting on the percentage of time when aircraft stands are available (which would be consistent with the aircraft stand availability measure reported by Gatwick) and would be able to report on this measure of stand availability (although we do not currently capture this information).

## **3 Time for passengers to clear security**

We recognise that time to clear security is an important issue for passengers and would support reporting the proportion of time for which the queueing time to clear security is 15/30 minutes or less; we do not think that a measure of 5 minutes is a reasonable time to clear security given the importance of ensuring thorough and effective security checks.

We also note some confusion in CICRA's thinking, in that they say: *"the removal of access to drop of [sic] near the terminal caused some concern, but CICRA understands that this is an issue of airport security and as such would not propose to treat it as a quality of service issue"*, while time for passengers to clear security queues at the airport is also a matter of airport security, but they are proposing reporting measures for airport security queues.

## **4 Time to unload luggage**

The proportion, rather than the number of flights for which the final bag is delivered to the carousel more than a certain minutes after arrival is a better measure of luggage handling performance, since the number of scheduled flights varies significantly across the year and therefore comparisons of quarterly numbers of bags delivered after a certain number of minutes would be a meaningless

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<sup>14</sup> See <https://www.heathrow.com/company/company-news-and-information/performance/airport-operations/service-quality-rebate-and-bonus-scheme>



statistic. Measuring the proportion would also facilitate comparison with other airports with different numbers of flights and different scheduling patterns across the year (although we note that both Heathrow and Gatwick report on the availability of baggage reclaim carousels, rather than time to unload baggage).

Current KPIs between the airlines and Swissport (who are responsible for baggage handling at Jersey airport) focus on the proportion of flights for which the final bag is delivered to the carousel 20 minutes after arrival and 45 minutes after arrival. While there is nothing special about these numbers compared with 15 and 35 minutes, it would be sensible to align the measurements reported by POJL with the Swissport KPIs.

## **5 Response to issues and complaints raised**

We believe that the number of issues or complaints raised and how quickly they are dealt with is a useful measure of our performance and should be reported for all the POJL businesses and not just the marinas as CICRA suggest. We do capture the number of complaints and are putting in place a process to track response times, once this is in place we would be happy to report this information as an additional reporting measure. It should be noted that many of the issues and complaints that we receive are the responsibility of other parties (eg ground-handlers or airlines), in which case we explain that the customer needs to contact the relevant party concerned and support the customer in pursuing their complaint by providing all relevant contact details for the third party. We also follow up to seek to ensure that this is satisfactorily resolved.

### **Harbour**

#### **1 Punctuality**

As for the airport, we believe that the proportion rather than the number of sailings which are delayed or cancelled is a better measure. As with the airport, we do not cancel sailings. We think it is useful to publish this information to help passengers plan their journey, but we urge caution on relating sailing delays to port performance there are very few if any delays to sailings caused by Jersey port operations.

We suggest that we align punctuality measures for the Condor ferry routes to the measures already contained in the Operating Agreement that we have with Condor<sup>15</sup>, since this clearly relates to the performance levels that our customer values. These measures are based on length of journey, for example, a 30 minute delay on an hours sailing is more material than a 30 minute delay on a 9 hour journey. For non-Condor ferries (which typically operate on shorter routes) we would suggest a separate measure that aligns with the Condor punctuality measure for shorter routes.

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<sup>15</sup> The Condor Operating Agreement can be found at: <http://www.ports.ie/SiteCollectionDocuments/ID%20Agreement%20Condor%20Operating%20Agreement%2020140715%20KW.pdf>

Illustration compiled from the Condor Operating Agreement:

Journey Length	Delay Length	
	Moderate	Material
A scheduled journey of up to 4 hours (i.e. routes Jersey to/from St Malo or Guernsey)	30 Mins	60 Mins
A scheduled journey of more than 4 hours, but not exceeding 8 hours; (i.e. routes Jersey to/from UK, in HSC)	60 Mins	90 Mins
A scheduled journey of more than 8 hours, but not exceeding 24 hours (i.e. routes Jersey to/from UK in the RoPax vessel)	90 Mins	120 Mins

## 2 Availability of Berths

We are able to capture information on the percentage of time when commercial berths are available, rather than the percentage of arriving vessels for which suitable berths are available on arrival (which we do not track) and would be able to report on this measure (although we do not currently capture this information). The principal cause of lack of berth availability is ferries arriving outside their schedule rather than lack of harbour infrastructure. We are uncertain as to how useful this measure will be, as berth availability is generally not an issue for our customers.

## 3 Time for passengers to clear security

CICRA state *“for ferry passengers, because when security checks are conducted for foot passengers and vehicles, similar information [about the length of queues or queueing time] would not provide such a consistent or comparable measure of customer experience at Jersey harbour. In that case, the time taken to embark or disembark is more appropriate.”* They also state that the proposed information to be collected initially at the Harbour should focus on passenger boarding time and not queueing times to clear security. We therefore do not understand why despite these comments, CICRA have proposed queueing time as a reporting measure for the harbour when by their own assessment it is not an appropriate measure (which we agree with, for the reasons that they state). In any case, we do not have systems in place that could capture and measure this information and to introduce such systems would impose a disproportionate cost on the business at this time.

## 4 Passenger Boarding / Disembarkation times

Neither we nor Condor currently track customer boarding or disembarkation times, nor do we have the ability to do so. We believe that it would impose disproportionate costs for us to introduce systems to measure and report this information at this time and therefore do not support this proposal. We do however note that CICRA’s suggestion of reporting the number of sailings for which the last passenger disembarkation is more than 15 minutes after arrival is not a very sensible measure, as it typically takes far longer than 15 minutes for all the passengers to disembark from a ferry and so this measure would generally be 100%.

## **5 Response to issues and complaints raised**

We believe that the number of issues or complaints raised and how quickly they are dealt with is a useful measure of our performance and should be reported for all the POJL businesses and not just the marinas. We do currently capture the number of complaints and are putting in place a process to track response times, once this is in place we would be happy to report this information as an additional reporting measure. It should be noted that many of the issues and complaints that we receive are the responsibility of other parties (eg ferry operator or shipping line), in which case we explain that the customer needs to contact the relevant party concerned and support the customer in pursuing their complaint by providing all relevant contact details for the third party. We also follow up to seek to ensure that this is satisfactorily resolved.

### **Marinas and Moorings**

#### **1 Waiting time for new berths**

The waiting time for new berths at the harbours are size<sup>16</sup> and location specific, for example berths of between 15 and 20 metres in Elizabeth Marina can take up to two years before they can become available. In La Collette and St Helier Marina these times are substantially longer. There are therefore a wide range of potential waiting times and it is not clear which waiting time this measure relates to. While we do estimate berth waiting times (and provide customers with information about the number of customers ahead of them in the waiting list for their particular request and an estimate of their potential waiting time), it is impossible to accurately forecast waiting times since they depend on future decisions by existing berth holders over when they decide to release their berths. We do hold and would be able to report on the number of customers waiting for a new berth (by size and location).

Given that harbour capacity is effectively fixed (without significant investment), waiting times and numbers waiting reflect the level of demand for our infrastructure rather than a measure of our performance. It is not clear what an increase or decrease in waiting times represents – for example an increase in number of customers waiting and therefore forecast waiting time could reflect an improvement in harbour infrastructure and POJL service and therefore increased demand for berths at the harbour rather than any decline in performance. We are therefore not sure of the usefulness of this reporting measure.

#### **2 Availability of marina infrastructure**

CICRA have not specified what they mean by 'key infrastructure' in order to measure its availability. Most of the 'infrastructure' at the marinas are pontoons. We provide pontoon mooring facilities for over 1150 craft across our three St Helier marinas, of which over 900 berths are leased on annual contracts for both local and non-locally resident craft and a further 250 berths are available for visiting and holding craft. We also provide 500 dry moorings within the St Helier historic harbour at the old Commercial Quay (Old Harbour). These moorings range in size from dinghy and outhaul moorings to ground chain and riser buoy moorings. In the absence of further specification of what CICRA are suggesting is reported, we would not support this measure as currently stated. We are

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<sup>16</sup> Size ranges are as follows: under 6 metres, 6 - 8 metres, 8 - 10 metres, 10 - 12 metres, 13 metres, 14 metres, 15 metres and 16 - 20 metres

willing to work on a clearer definition and discuss what the measure is seeking to achieve in order to determine an appropriate measure.

### **3 Responses to issues and complaints raised**

We suggest that these measures are restated to make it clear that they refer to the number of complaints closed in 10/20 days or less. We do currently capture the number of complaints and are putting in place a process to track response times, once this is in place we would be happy to report this information. It should be noted that many of the issues and complaints that we receive are the responsibility of other parties, in which case we explain that the customer needs to contact the relevant party concerned and support the customer in pursuing their complaint by providing all relevant contact details for the third party. We also follow up to seek to ensure that this is satisfactorily resolved.

#### **Production of quarterly reports**

POJL are happy to begin reporting on the measures that we propose for the data that we currently capture. However for measures where we do not currently capture the information, we do not believe that reporting should start until it is clear what measures we are expected to report and have had an opportunity to put in place systems to ensure that they are properly captured. In any case it cannot be correct to impose a licence requirement on us to report on historical information which has not been captured and which we would not be able to create retrospectively or information which requires us to guess the future actions of our customers.

We would also need to consider whether our systems are capable of providing the information required and for us to have properly recorded, checked and validated the numbers within 2 weeks of the end of the quarter concerned (i.e. by 15 April for the period from January to March). We believe a period of 4-6 weeks after the end of the reporting period is likely to be a more realistic target, but will need to confirm depending on the exact reporting measures decided upon<sup>17</sup>. We do not believe it is sensible for CICRA to impose reporting requirements which our systems cannot deliver against or which impose disproportionate costs on the business to measure or to measure to an unrealistic deadline.

#### **Customer satisfaction surveys**

We note that CICRA have suggested that they will work with POJL to develop customer satisfaction surveys which address areas of service highlighted as important to customers and port users. We look forward to working with CICRA in this area. We have recently started working with Airport Council International (ACI) to include Jersey airport in their Airport Service Quality passenger satisfaction survey which covers over 300 international airports and measures 34 key performance indicators in a way that allows comparisons between the different airports based on geography and size. We would hope to draw on this rich information source, rather than seek to create a new approach.

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<sup>17</sup> For example it is impossible to report on the number complaints closed within 20 days until at least 20 days after the end of the reporting period.

Similarly, we carry out an annual marina survey which asks for feedback and comments on a wide range of aspects of the marina services that we provide, we would hope that to draw on this existing survey rather than reinvent a new approach.

### **Additional awards received by Ports of Jersey**

In Annex A of our response to CICRA's quality of service consultation, we set out 8 awards that we have received since 2010. We are pleased that since that response we have received two more prestigious awards:

- St Helier Marina was voted Coastal Marina of the Year 2018 by the UK Yacht Harbour Association (UK YHA) ahead of over 160 Gold Anchor accredited marinas from across the globe<sup>18</sup>; and
- Jersey Airport has been named 'Best Aerodrome' by the UK Aircraft Owners & Pilots Association (AOPA) for its outstanding facilities and helpful service<sup>19</sup>.

In addition, all three of our marinas have maintained their 5 Gold Anchor status for the 15<sup>th</sup> successive year.

### **Ports of Jersey January 2018**

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<sup>18</sup> The UK YHA say "These awards really mean something because it is marina customers who are voting for their marinas, recognising the excellence of facilities provided and the level of service which they receive."

<sup>19</sup> AOPA say that "Jersey Airport stands out as a busy airport that manages to provide outstanding service to general aviation visitors and residents alike"

## Annex 1: Responsibility for performance measures

### Jersey Airport

Area	Influencers	Prime responsibility
Punctuality of flights to and from Jersey Airport	<ul style="list-style-type: none"> <li>• Airline</li> <li>• Airport</li> <li>• Weather</li> </ul>	<ul style="list-style-type: none"> <li>• Airline</li> </ul>
Availability of Airport Stands	<ul style="list-style-type: none"> <li>• Airport</li> </ul>	<ul style="list-style-type: none"> <li>• Airport</li> </ul>
Time for passengers to clear security	<ul style="list-style-type: none"> <li>• Airport</li> <li>• Security provider</li> </ul>	<ul style="list-style-type: none"> <li>• Airport</li> </ul>
Time taken to unload luggage	<ul style="list-style-type: none"> <li>• Ground-handlers</li> <li>• Airport</li> </ul>	<ul style="list-style-type: none"> <li>• Ground-handlers</li> </ul>
Response to issues and complaints raised	<ul style="list-style-type: none"> <li>• Airport</li> <li>• Airlines</li> <li>• Ground handlers</li> <li>• Security Provider</li> </ul>	<ul style="list-style-type: none"> <li>• Airport</li> </ul>

### Jersey Harbour

Area	Influencers	Prime responsibility
Punctuality	<ul style="list-style-type: none"> <li>• Weather</li> <li>• Harbour</li> <li>• Operator</li> </ul>	<ul style="list-style-type: none"> <li>• Operator</li> </ul>
Availability of Berths	<ul style="list-style-type: none"> <li>• Harbour</li> </ul>	<ul style="list-style-type: none"> <li>• Harbour</li> </ul>
Time for passengers to clear security	<ul style="list-style-type: none"> <li>• Harbour</li> <li>• Operator</li> </ul>	<ul style="list-style-type: none"> <li>• Operator</li> </ul>
Passenger boarding / disembarkation	<ul style="list-style-type: none"> <li>• Harbour</li> <li>• Operator</li> </ul>	<ul style="list-style-type: none"> <li>• Operator</li> </ul>
Response to issues and complaints raised	<ul style="list-style-type: none"> <li>• Operator</li> <li>• Harbour</li> </ul>	<ul style="list-style-type: none"> <li>• Harbour</li> </ul>

### Marinas and Outlying harbours

Area	Influencers	Prime responsibility
Availability of infrastructure	<ul style="list-style-type: none"> <li>• Marina</li> </ul>	<ul style="list-style-type: none"> <li>• Marina</li> </ul>
Response to issues and complaints raised	<ul style="list-style-type: none"> <li>• Marina</li> </ul>	<ul style="list-style-type: none"> <li>• Marina</li> </ul>