Governor's Office
British Virgin Islands

12 November 2026

Review of Governance Reform Progress

Governor Daniel Pruce

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1. Executive Summary

1.1. This review responds to the 22 September 2025 letter from the then Minister for the Overseas Territories, Stephen Doughty MP, and assesses the Government of the Virgin Islands' progress in improving governance.

1.2. In his letter, Minister Doughty considered the Government of the Virgin Islands' self-assessment, my review, and wider evidence on implementation of the Commission of Inquiry (COI) recommendations. The Minister recognised that important and significant progress had been made.

1.3. Minister Doughty was clear that formal implementation of the recommendations would not be enough. He stated that "fundamental and sustained change in the spirit and practice of governance, public and political life and administration in the Virgin Islands" would be the only true safeguard against backsliding. He therefore asked me to publish reviews assessing whether the reforms are being sustained, embedded and translated into tangible improvements in practice. His letter is attached at Annex A.

1.4. I have delayed publication of this first report until now to allow for the programme to establish itself. This report therefore assesses eighteen months of implementation, since Cabinet agreed its Governance Reform Implementation Action Plan on 9 April 2025. This date marks the point where monitoring arrangements were handed over to the Premier's Office from the Governor's Office.

1.5. The evidence points to a mixed picture. There has been meaningful progress in several important areas since the Governance Reform Implementation Action Plan was agreed:

a. The report of the Constitutional Review Commission has now been debated in the House of Assembly and there have been two rounds of constitutional negotiations between the Virgin Islands and the United Kingdom delegations.

b. The Public Assistance (Amendment) Act 2024, which introduced a new social protection framework, came into force on 1 September 2025.

c. The Immigration & Passport (Amendment) Act 2024, which clarified eligibility criteria, introduced a quota-setting committee, and established the Immigration Appeals Board, came into force on 26 June 2025.

d. The register of interests for senior public officers, initially established by the Public Service Management Act 2024 in January 2025, has been operational for over a year and enforcement action has been taken in instances of non-compliance.

1.6. As at September 2026, the Government of the Virgin Islands' implementation tracker reported that 96 of 150 actions had been completed, 4 were on track, 2 were at risk and 48 were reported as late. This represents recorded completion of 64%, against the approximately 95% completion target in the programme plan.

1.7. These figures provide a useful indication of activity and delivery pressure, but they are not in themselves a reliable assessment of impact. Actions vary significantly in scale and importance, and an action recorded as complete does not necessarily demonstrate that the intended institution, process or public benefit is fully operational. Completion percentages should therefore be treated as indicators of recorded activity rather than as a complete measure of implementation, institutional effectiveness or public impact.

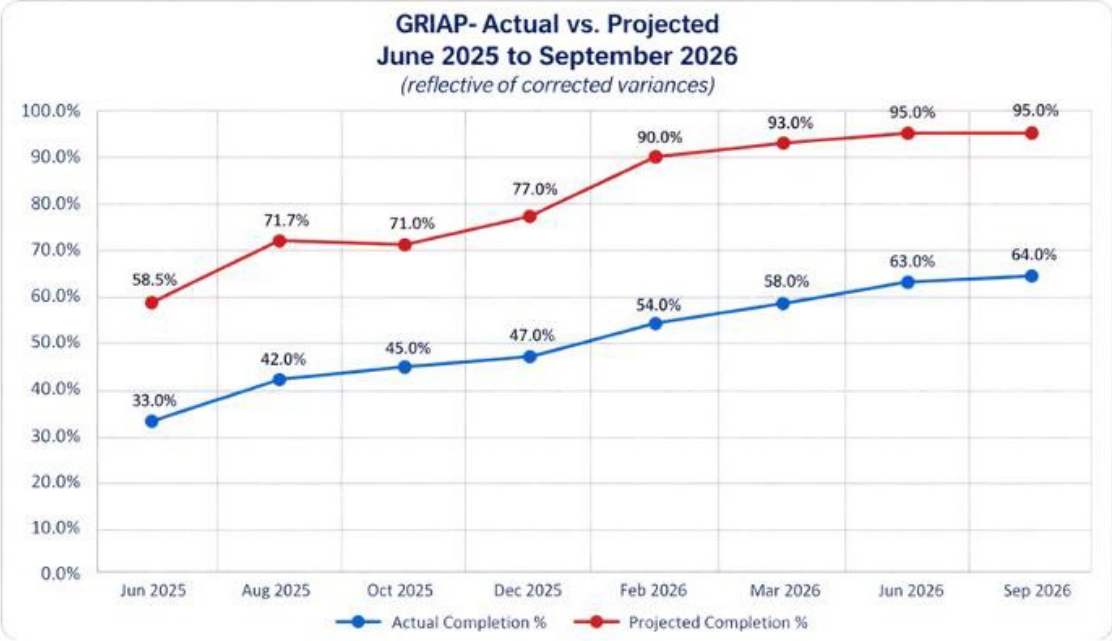


Figure 1: Projected and actual completion of the Governance Reform Implementation Action Plan. Source: Governance Reform Steering Committee's GRIAP Update, September 2026, Premier's Office.

1.8. While a number of important reforms are now beginning to function in practice, significant weaknesses remain. In particular, the Integrity Commission and Parliamentary Commission for Standards are not yet operational. These critical

institutions for safeguarding integrity in public life are not yet ready to bear the weight of responsibility foreseen for them by the COI.

1.9. Statutory boards reform remains substantially delayed, with only two additional boards receiving legislative updates over the past two years and little progress made on the important task of rationalisation. Work relating to Crown Land, whistleblowing and law-enforcement vetting remains incomplete. In these areas, the legislative and policy framework has advanced further than practical implementation.

1.10. It is disappointing that the governance arrangements which supported delivery of the COI reforms were substantially reduced before the reforms had been fully implemented or embedded. The valuable Permanent Secretary-led Steering Committee ceased meeting shortly after Minister Doughty's visit to the Virgin Islands in November 2024, as the COI process moved into an assessment phase, and did not resume regular meetings until October 2025. This period coincided with a slowing of recorded delivery. I welcome the resumption of Minister-level Tripartite meetings in June 2026.

1.11. Between October 2025 and September 2026, a further 27 actions were completed, bringing the total from 69 to 96. However, progress in the latest reporting period between July and September was limited to one further action. Of the 54 outstanding actions, 48 are now late. The latest figures therefore indicate that delivery has stalled. Urgent action is needed to close the gap between the original projected completion of approximately 95% by this stage and actual completion of 64%. Given the scale of delay, rescheduling and reprioritisation may be the most appropriate next step.

1.12. My overall judgement is that progress has been uneven and has too often depended on renewed intervention after delivery has slipped. The COI reform programme established important legal and administrative foundations, but implementation under the Governance Reform Implementation Action Plan has been weakened by inconsistent prioritisation, insufficient resources and poor follow-through.

1.13. Plan targets were overly optimistic. There have been limited attempts to escalate slippage and reduce delivery risk. Senior level engagement diminished alongside the transition from delivering the COI recommendations to the longer-term governance reform programme in April 2025. The Minister-level Tripartite meeting was not reconvened until June 2026, and its two meetings have led to minimal tangible changes in approach. The overall programme has lost momentum. My particular concerns relate to:

a. Integrity in public life: progress has been made in establishing the legislative framework, but the institutions intended to uphold integrity in public life are not yet operational. More than two and a half years after the Integrity Commission was established in law, and more than eighteen months after the establishment of the Parliamentary Commission for Standards, neither body is fully functioning. Concerns also remain about the accessibility of the Register of Interests, with only one independent public inspection since the regime was introduced, and amendments to the whistleblowing framework have not progressed.

b. Statutory boards: legislation for only two additional boards has progressed since amendments for the initial five priority boards were passed in September 2024. The Government's board-by-board approach, rather than the overriding statute recommended by the COI, has significantly increased the scale of the task and impeded broader, consistent reform.

1.14. I make several recommendations to get the plan back on track. Those are set out in the next section. The most pressing priority is to give this vital programme the political priority, delivery urgency and practical resources it needs. At a technical level, procedures for resolving delivery delays, mitigating risk and measuring benefits need improvement.

1.15. Given my concerns, I will complete my next report within six months, by April 2027.



Governor Daniel Pruce

2. Recommendations

2.1. The findings of this review show that the governance reform programme requires renewed political attention and a stronger focus on delivery. Consideration should be given to the following steps:

a. **Strengthen senior supervision** by resolving barriers requiring political direction and empowering senior public officers to achieve agreed commitments.

b. **Focus delivery and accountability** through prioritising outstanding reforms, with clearly defined accountability for their delivery and realistic deadlines. This should be supported by any necessary additional programme management capacity, other resources, and effective arrangements for identifying, escalating and resolving delays.

c. **Reinvigorate statutory board reform** by the urgent completion of the rationalisation exercise. It may also be necessary to revisit the Commission of Inquiry recommendation for overarching legislation to establish common governance standards.

d. **Prioritise the integrity framework** so that it is fully operational by April 2027, before my next review**.**

e. **Use evidence of public impact to guide future reform** by building on existing public education, consultation and feedback activity. Greater account should be taken of public awareness, engagement and experience when determining what further action is needed. This would help ensure that future priorities respond to how reforms are working in practice, as well as whether planned actions have been completed.

3. Background

3.1. The Commission of Inquiry (COI) Report, published on 29 April 2022, made recommendations to address significant governance failings and strengthen integrity, accountability and good administration in the Virgin Islands. A Framework Agreement between the UK Government and the Virgin Islands Government of National Unity set out the plan for delivering those recommendations. In May 2025, I submitted my Final Review, the Government submitted its self-assessment, and the United Kingdom began considering the collective body of evidence, including feedback from the public and assessments from officials.

3.2. On 22 September 2025, the then Minister for the Overseas Territories wrote to the Premier and recognised that important progress had been made, though more slowly than originally envisaged. The letter made clear that implementing the recommendations in a purely formal sense would not be enough: the objective was sustained and tangible change in governance, public administration and political life. The Minister concluded that sufficient progress had been made for the Order in Council, which provided for the possibility of a temporary partial suspension of the Constitution, to be revoked. On 13 March 2026, the Order in Council was lifted.

3.3. The Minister requested a six-monthly review process to assess whether the reforms are being embedded and translated into consistent practice. While this review was originally prepared earlier in 2026, publication was deferred to allow updated implementation evidence to be considered, assessments to be validated, and consultation to take place with the Government of the Virgin Islands. It is anticipated that future reviews will establish a regular publication cycle.

3.4. This report has been prepared with reference to progress since 9 April 2025, the date from which Cabinet agreed the revised governance reform monitoring arrangements, taking into account commitments made by the Government in its May 2025 self-assessment and subsequent reporting against the Governance Reform Implementation Action Plan.

3.5. Although the Premier's Office is responsible for oversight of the governance reform programme and the regular reporting to Cabinet, all Ministries and the Governor's Office play an active role in this process. The Governance Reform Transition Plan, the Governance Reform Implementation Action Plan and associated Communications Plan formalised the transition from the targeted implementation of the COI recommendations to wider and ongoing governance reform.

4. Governance and Resources

4.1. During the most intensive phase of COI implementation, the Governance Reform Coordination Centre brought the Premier's Office, Governor's Office and responsible officials together through regular working sessions, supported by frequent Governor–Premier coordination, a senior-official Steering Committee and ministerial Tripartite meetings. On 9 April 2025, Cabinet approved the Government-led Governance Reform Transition Plan and Governance Reform Implementation Action Plan, under which monitoring, evaluation and accountability transitioned to the Premier's Office. The supporting coordination arrangements were subsequently reduced before all reforms had been implemented or embedded.

4.2. Recorded delivery slowed during the period in which the Steering Committee was not meeting regularly. Meetings resumed on a bi-monthly basis during the latter part of 2025 and returned to a monthly schedule in February 2026 in an effort to restore momentum. This experience demonstrates that the programme requires continuing senior-level scrutiny, active problem-solving and clear accountability across all ministries and cannot be sustained through an action tracker alone.

4.3. The Steering Committee has increasingly focused on late actions, cross-agency dependencies and specific barriers, while the Tripartite meeting provides a forum for the Governor, Premier, Ministers and senior officials to test progress and agree interventions. Weekly working-level coordination between the teams supporting the programme, alongside my regular bilateral meetings with the Premier, has also helped to maintain communication and escalate difficult issues. These mechanisms are necessary, but their effectiveness depends on engagement within the responsible Ministries and institutions.

4.4. Human-resource capacity remains uneven. The Premier's Office retains a small central team responsible for monitoring, evaluation and coordination, and ministries have identified liaison officers and other officials to support delivery. This has enabled regular Cabinet reporting and more focused action tracking, but much of the work continues to be carried out alongside substantial existing responsibilities. Delays in recruiting to key posts, obtaining specialist support and securing sustained engagement across institutions have affected reforms including those related to integrity in public life, statutory boards, immigration and digital systems. These are not peripheral administrative matters: they are the practical conditions required for institutions and policies to operate.

4.5. The programme is now less dependent on the drafting of new legislation, but more dependent on operational, policy, project-management, technology and communications capability. Those skills and sufficient officer time need to be assigned deliberately rather than assumed to be available. The recurring difficulty is therefore not simply a general shortage of capacity. In some areas, stated priorities have not been translated into named personnel, protected officer time, specialist capability and realistic implementation plans.

4.6. The financial position is similarly mixed. The Transition Plan recognised that ministries would need to identify and absorb direct and indirect implementation costs through their budgets, supported where appropriate by external partners. There is evidence of funding being secured for some posts, institutions and programmes, but also examples of delivery being scaled back or delayed because funding, office accommodation, staffing or technical systems were not available when required. Minister Doughty's September 2025 letter emphasised that sustained change, rather than formal completion, was the true safeguard against backsliding. Renewed senior attention is therefore welcome, but the people and financial resources assigned to the programme have not yet been consistently matched to its stated ambition.

5. Constitution / Primary Recommendations

5.1. Constitutional reform remains one of the most politically significant strands of the overall programme. Since the Final Review, the Constitutional Review Report was debated in the House of Assembly, and negotiations are well underway. The reform process was always expected to transition from the COI framework into constitutional discussion. This review does not seek to prejudge those negotiations. Its purpose is to assess progress in implementing and embedding the governance reforms, including those matters which may ultimately require constitutional treatment.

5.2. On discretionary powers, there has been progress. The Discretionary Powers Policy has been issued, training sessions have been conducted across ministries and supporting materials have been developed to assist officers. However, the more important question is whether the policy is influencing the way discretionary decisions are made in practice. At present, there is limited evidence on which to assess the consistency of its application across Government or the extent to which it has become embedded in everyday decision-making. The intended compliance-monitoring arrangements have taken longer to implement than originally envisaged, having initially been affected by resource constraints and subsequently becoming dependent on the development and deployment of supporting systems. The policy has the potential to improve the

transparency, consistency and lawfulness of decision-making, but further evidence will be required before any firm conclusion can be reached as to its effectiveness.

6. Integrity in Public Life

6.1. The integrity framework has advanced in some important respects, but it remains one of the clearest examples of a reform area where legislation has moved further ahead than the institutions intended to operate it.

Register of Interests

6.2. The register of interests for senior public officers is functioning, additional staff have been recruited, the Registrar and team have been trained on the electronic system, and public education about the purpose of the register has taken place. For the 2026 mid-year declaration cycle, 166 officers were required to submit declarations. The Registrar of Interests reports that late submissions reduced from 43% to 35%, and enforcement action was taken in two cases of non-compliance. This is a good example of reform moving from legislation into administrative practice; however, it remains concerning that more than a third of senior public officers submitted their declarations after the applicable deadline.

6.3. For elected officials, progress is more uneven. Members of the House of Assembly continue to submit declarations and the Registrar reports that all required registrations have been completed, with no anomalies identified through inspection. However, Members have not yet moved onto the electronic system because the Standing Select Committee must first approve the format of the digital Register. The declaration requirement is therefore operating in practice, but an important element of the intended modernisation remains incomplete. Digitisation could also provide an opportunity to improve public accessibility and transparency. It remains the case that anyone wishing to view the Register must make a written application, pay a fee for each record inspected, inspections must take place in the presence of the Registrar and, most restrictively, no copies or notes on the content of the Register can be made.

6.4. Public use of the Register of Members' Interests has been extremely limited. Between 1 January 2025 and 30 September 2026, four requests for inspection were received and four inspections took place. Three were connected with the COI implementation review; only one inspection was undertaken independently by a member of the public. No requests have been received since June 2025.

6.5. When assenting to the 2022 Register of Interests amendments, my predecessor, Governor John Rankin, expressed concern that the requirements for inspecting the Register meant that it had been made public only in a highly limited way. He considered that these arrangements ran counter to the principle of transparency and called for the system to be reconsidered. Subsequent usage supports the substance of that concern.

Integrity in Public Life

6.6. The more significant issue is the operational readiness of the Integrity Commission and Parliamentary Commission for Standards. The Integrity in Public Life Act was brought into force on 7 February 2024, over two and a half years ago, though the Integrity Commission has not yet secured office space and the secretary has not yet been recruited. It is, however, encouraging that the advert for the secretary has recently been published and contracts for the office space are currently being drawn up.

6.7. The House of Assembly opted for a separated model of integrity institutions for different persons in public life. The Parliamentary Commission for Standards is less advanced, following its establishment on a legislative footing in March 2025. The Government's intention was for the Commission to be in place, with Members appointed and administrative support secured, at the time the law came into force. As at the date of this review, the Commissioners themselves have not yet been appointed, despite the recruitment process being launched over a year ago. Funding has been secured, and Members of the House of Assembly have now received training on the role of the Commission and the Code of Conduct. The Government reports that a simple public guide and draft complaints process have been prepared. However, the published material does not yet explain how a member of the public may submit a complaint, and the relevant forms have not been published.

6.8. Legislation underpinning the integrity framework is in place. However, the Integrity Commission and Parliamentary Commission for Standards are not yet operational. The central institutional architecture envisaged by the reforms is therefore incomplete. This is a critical implementation failure requiring urgent resolution. The immediate priority must be to complete appointments, recruitment, accommodation and the practical arrangements necessary for both commissions to receive complaints and exercise their statutory functions.

Complaints Commission

6.9. The Commission of Inquiry recommended that the Complaints Commissioner report annually on the extent to which public authorities have responded to criticisms and recommendations, allowing greater scrutiny by the House of Assembly and the public. The historic backlog of reports was addressed during the implementation period, and the recommendation was subsequently treated as complete. However, the intention of the recommendation was not simply to clear historic reports, but to establish a culture of regular, timely and meaningful reporting. Recent reports have not been produced within the statutory timeframes. This illustrates a broader point reflected elsewhere in this review: the challenge is not whether reforms have been delivered once, but whether they have become embedded as routine and sustainable features of public administration.

Whistleblowing

6.10. Whistleblowing reform presents a similar implementation challenge. The Whistleblower Act is in force, and a substantial package of policy work has been undertaken. However, amendments intended to operationalise the regime have progressed more slowly than originally envisaged. Proposed changes to the framework have also raised concerns that the regime could move away from established best practice by limiting protected disclosures to a single reporting route. This remains an important area of reform, both because of its role in promoting accountability and because confidence in reporting arrangements is likely to influence whether wrongdoing is identified and addressed in practice.

7. Assistance Grants

7.1. Social assistance is one of the clearest examples of reform moving from law into practice. The Public Assistance (Amendment) Act 2024, which had not yet entered into force at the time of my Final Review of COI implementation, was subsequently brought into force on 1 September 2025. Since then, substantial implementation work has taken place. The Ministry of Health and Social Development has continued its public engagement and awareness campaign, staff have been trained on the amended Act and associated procedures, beneficiaries are being reassessed under the new criteria, and a dedicated Social Protection Programme Unit has now been established, with a Social Protection Manager appointed in March 2026.

7.2. This is an area of genuine success. The reform goes beyond a change on paper: it is gradually replacing the former fragmented and discretionary arrangements with a more

coherent social protection model. The wider policy ambition remains substantial, including work toward a fuller social protection framework, minimum guaranteed pension, child grant, and disability and unemployment benefits. Longer-term work remains in progress, but the initial transition has clearly moved forward.

7.3. There are, however, some continuing challenges linked to systems. The interim management information system was discontinued because it could not reliably accommodate the updated legislative framework. A new system is therefore being developed, but this work remains ongoing. The Social Development department has established a dedicated telephone number and WhatsApp line to receive assistance enquiries, feedback and complaints. It has been reported that these channels are being used.

7.4. The framework for assessing, prioritising and delivering grants for community infrastructure and maintenance projects, the Ministry of Communications and Works' Civil Mitigation Policy, has been operationalised to a degree, with the Technical Assessment Committee mobilised and internal tracking and procedures in place. The Ministry recently issued a video on social media explaining the new policy arrangements.

7.5. Assistance grants reform is one of the more advanced elements of the governance reform programme, but long-term success depends on communication, effective systems and consistent application.

8. Contracts

8.1. The contracts and procurement reform agenda is well-established, and the aim now is ensuring that the revised framework is being consistently used. The COI-recommended audit of major contracts found the previous framework to have been inherently flawed and highlighted the need for balance, adequate oversight and strict compliance. The category of tender waiver was removed by the Virgin Islands Public Procurement Act 2021, which was brought into force on 6 September 2022, and the subsequent Public Procurement (Amendment) Regulations 2025 increased public procurement thresholds.

8.2. The table below demonstrates the procurement routes for contracts agreed in Cabinet. A significant proportion of contracts continue to be awarded through single-source procurement, an exceptional mechanism that should be used only in the circumstances permitted by the statutory framework.

Procurement route	2023	2024	Jan–Jun 2025	Jul–Dec 2025	Jan–Jun 2026	Jul–Sep 2026
Tender waiver	1 (2%)	0	0	0	0	0
Public tendering	25 (52%)	23 (48%)	4 (80%)	18 (72%)	5 (45%)	3 (100%)
Single source procurement	14 (29%)	19 (40%)	1 (20%)	7 (28%)	6 (55%)	0
Contracts for specialist work / public procurement exemptions	8 (17%)	6 (13%)	0	0	0	0
Total	**48**	**48**	**5**	**25**	**11**	**3**

Figure 2: Procurement route for contracts submitted for Cabinet approval.

8.3. Cabinet has approved eight contracts following public tendering to date during 2026 and six single-source procurements. The single-source procurements concerned the ExcoTrack web-based management platform used for Cabinet papers; security services for the transportation of government funds; the continuation of specialist consultancy support for implementation of the Virgin Islands' anti-money laundering and counter-financial-crime action plan; specialist tax-policy advice on the Territory's response to the global minimum-tax framework; renewal of the Immigration Border Management System contract; and the procurement of a VHF radio system for the Royal Virgin Islands Police Force. The nature of these procurements provides a legitimate operational or specialist basis for a single-source approach. Nevertheless, the continuing use of single-source procurement requires clear case-by-case justification and transparent recording of the statutory grounds relied upon.

8.4. The legislative and regulatory framework is stronger than before the COI. The challenge now is disciplined implementation. Success in this area will ultimately be measured by whether the new regime reduces inappropriate discretion, improves competition, strengthens contract management and oversight, and increases confidence that public money is being spent properly. The framework exists; the task now is to ensure that it is applied consistently and that its intended benefits are realised in practice.

9. Statutory Boards

9.1. Statutory boards are responsible for delivering important public functions and managing substantial public resources. The COI found that weaknesses in governance, accountability and oversight within a number of statutory boards created risks to the proper management of public funds and the integrity of public decision-making. The

resulting reforms were intended to establish clearer governance arrangements, strengthen appointments processes, improve transparency and ensure that boards are equipped to discharge their responsibilities in the public interest.

9.2. Statutory board reform remains one of the most significantly delayed elements of the programme. The Government has acknowledged that the existing legislative amendment approach has not delivered at the required pace and has developed a revised strategy focused on advancing the core governance measures for boards within the Statutory Boards Policy. This is a pragmatic response to delay, but its effectiveness will depend on a clear timetable, sufficient drafting capacity and demonstrable progress through Cabinet and the House of Assembly. The fundamental criticism in my Final Review of COI Implementation was that although amendments for five priority boards had been passed, broader reform beyond that first tranche had stalled. While progress has continued more slowly than originally envisaged, there have been some recent signs of momentum. It is encouraging that the recently passed Virgin Islands Energy and Water Corporation Act, 2026 includes some of the good governance provisions adopted with the priority boards.

9.3. Similar legislative reform has also been taken forward through the Virgin Islands Recovery and Development Agency (Amendment) Act, 2026. However, the new arrangements raise broader questions about consistency across the reform programme. The governance model adopted for the Virgin Islands Development Agency does not appear to fully mirror the approach taken in some earlier statutory board reforms, particularly in relation to the respective roles of Ministers and boards. Commencement of the new regime, the preparation of procurement rules and implementation of the wider operational arrangements will therefore be important tests of how the new framework operates in practice and the extent to which governance reforms are being applied consistently across the statutory boards landscape.

9.4. There has been useful progress in strengthening statutory board governance in some areas. It has been reported that the statutory boards database and application system has been developed, although it has not yet been launched. A legislative amendment schedule has been produced, and some board-level actions have been completed, including updated manuals, declarations of interest processes and training.

9.5. Some of the legislative amendments made during the COI reform process altered the eligibility requirements for board membership. While these changes may provide greater flexibility in appointments, some changes raise broader questions about the

standards expected of those appointed to public boards and the extent to which good governance reforms should place greater emphasis on public confidence, integrity and suitability for office. The practical impact of these changes will only become clear over time.

9.6. Generally, there has been a lack of grip and oversight of the statutory board reforms. The rationalisation exercise is only now moving into an exploratory stage, and education and training on the revised Statutory Boards Policy remains contingent on Cabinet approval of the revised Policy. The recruitment of a Statutory Boards Administrator is a positive development. However, progress to date suggests that stronger central coordination has not yet translated into consistent delivery across the reform programme.

9.7. Some board-specific reforms have gone further than others. The BVI Health Services Authority has implemented several changes, including on appointment arrangements, governance training and complaints processes. The Ports Authority has trained board members and is considering its documentation, but its post-implementation review has slipped. H. Lavity Stoutt Community College has updated some documentation, though it has been reported that further good governance policies remain outstanding.

9.8. It is encouraging that efforts are being made to resolve the issues and that the Premier's Office retains a stronger oversight role than before. However, statutory boards are still in need of a more coherent, better-resourced and more disciplined programme of central follow-through. The revised approach should not reduce the scope of good-governance standards merely to accelerate recorded completion. Rationalisation may appropriately result in the closure, merger or reclassification of boards following evidence-based assessment. However, all bodies which continue to exercise significant public functions or control public resources should remain subject to proportionate standards of appointment, accountability, financial oversight and transparency. Recent legislative developments are encouraging, but they do not yet amount to a comprehensive programme of reform across the wider statutory boards landscape. This is a reform area that requires continued attention and a firmer implementation grip.

10. Crown Land

10.1. Crown Land reform has moved materially beyond the position described in my Final Review of COI Implementation, but implementation remains incomplete. The Crown Lands Management Act 2024 was brought into force on 30 January 2025, and public education on the Act is reported as ongoing. Work to categorise Crown Land holdings

is underway and will inform development of the Crown Lands Register. This represents an important step towards greater transparency, although the Register is not yet publicly accessible.

10.2. There has also been progress in establishing the governance arrangements envisaged by the legislation. The Crown Lands Advisory Board has been appointed and has met. Recruitment for the Anegada Standing Committee has commenced through a public advertisement process, with the Ministry intending to use this as the first phase of implementing the Standing Committee model. These developments are welcome and indicate movement from legislative reform towards operational delivery.

10.3. The institutional framework governing Crown Land is not yet fully in place. The Crown Lands Register was intended to become a public tool allowing residents to identify available Crown Land and strengthen confidence that allocations are made fairly and transparently. While there are plans to publish the Register once development work is sufficiently advanced, this has not yet occurred. In addition, the Regulations contemplated by the Act have not yet been completed. These Regulations are expected to define key processes, responsibilities and operating arrangements under the new regime and are important to the effective functioning of the wider framework.

10.4. The broad policy direction remains sound and there is evidence that the Ministry continues to move the reforms forward. Nevertheless, full implementation depends on completion of the Register, establishment of the remaining governance structures and finalisation of the regulatory framework. Until these elements are in place and operating effectively, the reform cannot yet be regarded as fully embedded in practice.

11. Residence & Belonger Status

11.1. The reforms to Residence and Belonger Status have advanced significantly and are now at the implementation stage. The Immigration and Passport (Amendment) Act 2024 was brought into force in June 2025, and guidance has been published. The points system and new application form were approved in June 2025 and incorporated into the regulatory framework. This represents real progress in bringing greater structure and transparency to a policy area that the Commission of Inquiry identified as requiring reform.

11.2. Staff recruitment is still ongoing, office accommodation is still being finalised, and a public information campaign is expected. Training material for staff has been circulated, but some components remain under development. A labour policy had

been due for completion by the end of 2025, and a population policy had been due for completion in June 2026. Both remain outstanding.

11.3. The core legislative framework has moved forward, but the wider policy framework envisaged by the original review is not yet complete. Immigration reform should not be judged solely by whether the amending legislation is in force. It should be judged by whether the Department has the staff, processes, policies and public communications necessary to operate the new system consistently, transparently and fairly. On that broader test, there has been progress, but further implementation remains necessary.

11.4. The Immigration Department has continued working through its historic paper caseload of Residence and Belonger Status applications. It has been reported that all applications received before June 2022 for which applicants met the relevant requirements have been processed. A residual paper caseload remains at different stages of assessment, while a new online platform should make the tracking of applications easier in the future. This represents continued progress in addressing historic backlogs and improving the administration of applications. Initial assessments indicate a significant downturn in applications following the introduction of the online system, and this will require close monitoring.

11.5. The direction of travel is positive, particularly in relation to the oldest backlog. However, continued attention will be required to complete the remaining paper caseload, improve visibility of where applications sit within the process, ensure that the transition to the online platform does not create a new backlog, and assess whether the new arrangements are sufficiently understood and accessible to the public. As with other areas of governance reform, the ultimate test is not whether new procedures exist, but whether they result in a system that is more transparent, timely and predictable for applicants.

12. The Public Service

12.1. The Public Service is one of the stronger areas of implementation within the governance reform programme. The Public Service Management Act 2024 is in force, the associated Code has been converted into regulations, and substantial sensitisation and training has been delivered to public officers across the service. The Act represents the most significant reform of the public service framework in several decades and provides a modern foundation for integrity, accountability, performance management and professional development.

12.2. There has been credible progress in moving the reform from legislation into practice. The register of interests for senior public officers is operational, additional capacity has

been put in place, and the Registrar and supporting staff have been trained in the use of the electronic declaration system. The Governance Reform Implementation Action Plan records the completion of actions to train relevant public officers, educate officers on the new arrangements and support implementation of the integrity framework across the public service.

12.3. The Department of Human Resources and the Virgin Islands Public Service Learning Institute continue to provide awareness sessions and training. Monitoring of implementation is reported as taking place through surveys, circulars, meetings and follow-up assessment. This is welcome, as sustained management attention will be necessary if the standards and expectations set out in the Public Service Management Act 2024 are to become normalised across the service.

12.4. The broader public service transformation agenda also remains relevant. My Final Review of COI Implementation identified digital transformation, learning and development, customer service improvement and modern workforce management as important components of long-term reform. While substantial progress has been made in establishing the legislative framework, the next stage is less about legislative compliance and more about organisational culture, leadership practice and institutional performance with a particular focus on delivery and accountability.

12.5. Overall, this is one of the areas where the transition from legislative reform to implementation appears most credible. Nevertheless, the long-term success of the reform will depend not on the existence of the framework alone, but on its consistent application across ministries, departments and grades of the public service.

13. Law Enforcement & Justice

13.1. Progress in delivering law enforcement and justice reform remains mixed, but there have been several important developments since the Final Review of COI Implementation. New Criminal Procedure Rules, developed by the Eastern Caribbean Supreme Court, came into force in March 2026 and now apply across both the Magistracy and the Supreme Court. This addresses one of the significant areas that remained outstanding at the time of the Final Review. Training initiatives continue, and further efforts are underway to strengthen capability and capacity across the justice system.

13.2. COI recommendations B38 and B41 called for an independent review of the Virgin Islands' law enforcement and criminal justice arrangements. That review was subsequently carried out by His Majesty’s Inspectorate of Constabulary and Fire &

Rescue Services (HMICFRS) and now provides the principal roadmap for reform across policing, border security, financial investigations, prisons, the courts and wider criminal justice institutions. Since publication of the review, agencies have progressed a range of recommendations and related initiatives, and attention is increasingly turning towards implementation, coordination and long-term delivery.

13.3. In July 2026, the Premier and I jointly confirmed with the Heads of Agencies that, save for a limited number of recommendations requiring further constitutional, legal or policy consideration, the recommendations should continue to be reviewed, prioritised and advanced. Several recommendations which had previously faced funding or implementation constraints are now progressing. Additional funding has been secured in some areas, including aspects of prison reform and custodial oversight, allowing work to move forward on recommendations that had previously been slower to progress. This is an important development, as many of the remaining recommendations depend not simply on policy decisions, but on sufficient resources and implementation capacity.

13.4. The Security & Justice Strategy and Transformation Programme was launched on 28 October 2026 as a partnership between the Governor's Office, the Government of the Virgin Islands and the UK Government. The Programme is intended to provide a more coherent framework for implementing the recommendations arising from both the HMICFRS review and wider reform activity across the sector. The Programme brings together work on policing, maritime security, financial investigations, prisons and custody, courts and access to justice, anti-corruption, customs and immigration, and wider corporate services. Its purpose is to strengthen coordination, clarify ownership, identify dependencies and support sustainable implementation across agencies.

13.5. Vetting remains an important element of the wider integrity agenda. For the Royal Virgin Islands Police Force, the legal framework is in place, the outsourcing arrangements have been concluded and vetting activity has commenced. Some officers have received vetting clearances. However, an interim injunction has restricted the application of certain enforcement provisions while judicial review proceedings remain ongoing.

13.6. There has been progress in relation to prison, customs and immigration officers. In September 2026, I signed an agreement with the UK Home Office enabling the vetting of serving officers and applicants within His Majesty's Prison Service, His Majesty's Customs and the Department of Immigration. The agreement followed extensive engagement between the Governor's Office, the Public Service Commission, the Attorney General's Chambers, the Home Office and the agencies concerned, and represents an important step in implementing the statutory vetting framework across these services. Preparatory work is now underway to support implementation, and

forms have now been sent to prison officers who will be vetted as part of the initial phase.

13.7. Overall, the strategic direction for law enforcement and justice reform is clearer than it was a year ago. The HMICFRS review provides a long-term roadmap, several recommendations that previously faced practical obstacles are now progressing, additional resources have been secured in some priority areas, and arrangements are being put in place to coordinate delivery through the Security & Justice Transformation Programme. There is now a clearer framework for taking this work forward across government than existed at the time of the Final Review. The next phase will focus on implementation, ensuring that reforms continue to be translated into practical improvements in capability, coordination, integrity and public confidence across the security and justice system.

14. Public Engagement

14.1. Public engagement has continued throughout the reporting period and remains an important part of the wider governance reform programme. Constitutional outreach has continued through public meetings and consultation activity, while ministries and departments have undertaken communications and awareness campaigns linked to specific reforms, including public assistance, immigration reform, procurement, discretionary powers and wider governance initiatives.

14.2. These efforts are welcome. However, the success of public engagement should not be measured solely by the number of meetings held, consultation exercises undertaken or communications products issued. The more important question is whether members of the public understand the reforms being implemented, know how to access the systems, rights and services created by them, and can see tangible improvements in transparency, accountability and public administration.

14.3. The Minister for the Overseas Territories requested these reviews because governance reform is ultimately about more than legislation or the completion of actions within a delivery plan. Progress reports and action trackers remain important tools, but they cannot by themselves measure public experience. This review is intended to complement the Government of the Virgin Islands' own reporting by assessing whether reforms are becoming embedded within institutions and translated into practical improvements that can be experienced by the people of the Virgin Islands. A public survey, expected in the coming months, should provide a further opportunity to assess public awareness, confidence and experience of the reforms.

14.4. As the programme moves further from legislative reform and into implementation, increasing attention should therefore be given not only to communicating activity, but also to understanding outcomes. Public feedback, consultation and survey evidence can provide a valuable indication of whether reforms that appear complete on paper are operating effectively in practice. Over time, this should support a more rounded assessment of whether governance reform is resulting in sustained and meaningful change for the people of the Virgin Islands.

15. Conclusion

15.1. The evidence reviewed for this assessment demonstrates that governance reform has continued since the conclusion of the Commission of Inquiry implementation process and the transition to the Government of the Virgin Islands' oversight arrangements in April 2025. Important foundations are now in place. Key legislative reforms have been brought into force, and progress has been made in areas including public assistance, immigration, the public service, law enforcement and the administration of justice.

15.2. However, the central question is no longer whether reform activity is continuing. Rather, it is whether the reforms are becoming embedded within the institutions of government and translated into sustained improvements in governance, public administration and political life. On that question, the position is more mixed. While some reforms have moved beyond legislative change into day-to-day practice, others still lack the practical arrangements required for actual implementation, including regulations, systems, governance structures, staffing, accommodation, funding and clear operational responsibility.

15.3. There are nevertheless several encouraging developments. Progress has been made in reducing longstanding backlogs, implementing new legislative frameworks, advancing Crown Land reform, progressing vetting arrangements beyond the Royal Virgin Islands Police Force and establishing clearer structures for taking forward law enforcement and criminal justice reform. In several areas, reforms that had previously slowed or encountered practical obstacles have begun to move forward once again.

15.4. The evidence also underlines the importance of sustained implementation. The governance reform programme has moved from a phase dominated by legislation and policy development into the more demanding task of institutionalisation. In that respect, governance reform is becoming less about passing laws and more about ensuring that institutions function effectively, decisions are implemented consistently, staff are appropriately trained, resources are available where required and the public can see and experience the benefits of reform in practice.

15.5. My overall judgement is that progress has continued and that the direction of travel remains positive, but there is not yet sufficient evidence to conclude that the reforms are embedded or secure against backsliding. The approach to statutory boards reform and the integrity framework will require particular attention over the coming months. Additionally, three things will be important before my next report. First, clearer and sustained senior leadership, demonstrated not only through formal oversight but through consistent advocacy, decisions and behaviour. Second, proper resourcing of delivery, including named personnel, protected officer time, specialist capability, funding and credible implementation plans. Third, ongoing measurement of public awareness and experience, so that success is assessed not simply through completed actions but through evidence that the reforms are understood, accessible and making a practical difference to people's lives.

Annex A: Letter from Minister Doughty

Foreign, Commonwealth & Development Office

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PREMIER DR NATALIO WHEATLEY
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22 September 2025

Dear Premier Wheatley,

Thank you for travelling to London in July to discuss progress made in delivering your Government's Framework for Implementation of Recommendations of the Commission of Inquiry Report, and other issues.

Commission of Inquiry (COI) Recommendations

I know that this has been a personal priority for you, and that drafting the Framework was one of your first priorities as Premier. I particularly thank all of those in your team and the public service across the Virgin Islands, as well as the Governor and his team, for their personal efforts on this, while dealing with significant day to day issues and recovery from the legacy of the major challenges of the pandemic and the 2017 hurricanes.

The objectives of your government's approach are as relevant now as they were then – to deliver justice where wrongdoing is found; to engender a new culture in Government in the handling of the public's business; and to ensure the effective functioning of the Government institutions and systems that support good governance.

You have agreed with me in our many conversations that implementing the key COI recommendations in the formal sense will alone not be good enough.

Fundamental and sustained change in the spirit and practice of governance, public and political life and administration in the Virgin Islands, will be the only true safeguard against backsliding. It equally provides the foundation for the progressive and sustainable future we all seek for the people, and our relationship, in the future.

Demonstrating sustained and tangible progress will also be crucial in rehabilitating damage done to the reputation of the Virgin Islands and addressing the concerns you have regularly expressed to me about negative public narratives.

During my visit in November last year, I made a commitment to review progress with an open mind and to consider public consultations, a final report from the Governor, reviews by my department, and a self-assessment by your government. I have read all of these in close detail.

It is clear to me that your government, working closely with the Governor and the public service, has made important and significant progress and that some of my earlier concerns have been addressed. While that progress has been slower than initially envisaged, many significant pieces of legislation have been passed, and the agreed Framework actioned.

Given the progress made, while a number of important concerns remain about the implementation of the measures delivered, the Foreign Secretary, on my advice, has concluded that an Interim Administration will however not be required and has therefore issued instruction to "lift" the draft Order in Council (through revocation) that would have provided for an Interim Administration. This will take some months practically to take effect, and my officials will discuss the details with you in due course.

As we discussed in London, ensuring continued implementation of these reforms is vital. We must work together to build on these foundations, to secure good governance that is sustainable in the long term and delivers for the people of the Virgin Islands.

To that end, I have instructed the Governor to establish a monitoring mechanism, consisting of the publication of six-monthly reviews of good governance, in line with the quarterly reviews conducted since 2022. To ensure transparency I have asked that the Governor make these public, to keep the people of the Virgin Islands informed of progress.

I am also keen to continue to hear directly the views of the people and would suggest that we agree to conduct a joint annual survey on implementation, and wider good governance to be made public.

Policing, customs and security

In our meeting, we also discussed our shared concerns over the security situation in the Territory and the findings of the comprehensive review of law enforcement agencies conducted by His Majesty's Inspectorate of Constabulary and Fire Rescue Services (HMICFRS).

I remain deeply concerned about a number of issues identified in policing and customs, some of which I noted during my visit, and we discussed the critical importance of urgent completion of vetting processes among many other changes that are required to keep the people of the Virgin Islands safe and to combat serious and organised crime that also impacts on the United Kingdom, the region and our partners. I will remain particularly focused on these concerns and stand ready to work with you, the Governor and my colleagues in relevant UK Ministries and agencies in that endeavour.

I appreciate the positive approach you and the Governor have taken to discussions around its recommendations and the more collegial tone engendered during discussions with Members of the House of Assembly. I again emphasise that it is vitally important that law enforcement agencies are properly funded through the annual budget process, to ensure they are given the proper tools and resources to do their job.

Other issues

Finally, we also discussed a range of separate concerns related to tackling illicit finance and ensuring financial transparency. I promised you that I would consider these separately from the specific scope of the COI and its implementation, but I would again emphasise the importance of urgent progress in this area before we next meet.

I would also like to take this opportunity to address recent media coverage in the UK and the Virgin Islands concerning the constitutional relationship. There is no change to the UK's long-standing position in this regard.

This UK government will continue to engage with your government, and indeed other Overseas Territories, in the spirit of the openness and principles I set out when we took office. The Virgin Islands are a valued part of our global British family and we are committed to work with you in a mutually respectful relationship based on our respective responsibilities.

I sincerely hope that we are now entering a new chapter for the Virgin Islands and our relationship. You will understand of course we reserve the right to take any appropriate actions necessary in future, to work with you to uphold good governance, security and the rule of law, in line with our respective constitutional responsibilities and, most importantly, the mutual interests of the people of the Virgin Islands and the United Kingdom.

I am grateful to you for your continued partnership and look forward to seeing you in London for the Joint Ministerial Council in November.

Yours sincerely,



Stephen Doughty MP
Minister of State for Europe, North America and UK Overseas Territories