



Access to Public Information Request

Date of receipt: 15 June 2021

Date of response: 13 July 2021

Access to Public Information request regarding vaccine 'passports'

Request:

Re: Vaccine passport - vaccine certificate - proof of vaccination

I am making this request under the Code of Practice for Access to Public Information in order to understand the island's present position with regard to the implementation - or otherwise - of vaccine certificates. The descriptions of vaccine passport, vaccine certificate, and proof of vaccination refer to the same type of document, and no distinction is intended or implied through the use of any of those terms.

I would be grateful for your replies to the following questions:

1. On what date/s was the subject of vaccine certificates previously debated by the States Assembly?
2. What resolution/s was/were passed by the States Assembly regarding the introduction of vaccine certificates?
3. Was a recorded vote taken for any resolution/s passed by the States Assembly? If so, please provide details of the recorded vote/s POUR and CONTRE
4. Has the CCA resolved to introduce a vaccine certificate without subjecting the decision to the scrutiny of the States Assembly? If so, please provide the text of the said resolution

5. Two recent Guernsey Press articles indicate that work has already commenced on the development of a Guernsey vaccine passport and, furthermore, that such a passport could be released in early July.

5a) Who authorized the development of the Guernsey vaccine passport?

5b) When was the development of the Guernsey vaccine passport debated and approved by the States Assembly or by the CCA?

6. Has there been any further development or debate regarding vaccine passports between the date of my above request and the date of your reply?

7. Vaccine passports/certificates have a direct impact on the freedom and privacy of every citizen, and should therefore not be considered without prior public consultation. Has a date been set to conduct such public consultation?

8. In situations where foreign destinations require proof of vaccination, can assurance be given that the option of a paper document containing the minimum information will be made available to those Guernsey residents wishing to retain their privacy and retain control of their own personal data?

Response provided by the Civil Contingencies Authority:

1. The matter was debated pursuant to the statement by the Chairman of the Civil Contingencies Authority at the meeting of the States of Deliberation on 16th June 2021.

2. There have been no resolutions passed by the States Assembly regarding the introduction of vaccine certificates.

3. No, as above.

4. The CCA has given the Assembly the opportunity to scrutinise the decision to introduce

vaccine certificates, as noted above it was debated pursuant to the statement by the Chairman of the Civil Contingencies Authority at the meeting of the States of Deliberation on 16th June 2021.

5a) It is important to note that the phrase ‘vaccine passport’ is not generally used but instead the term COVID status is preferred. COVID status can be based on vaccination, testing or natural immunity (or a combination), and there needs to be some form of documentation to prove this.

For several months Guernsey officials have been engaging with the UK Government, Devolved Administrations and the other Crown Dependencies in order to understand the potential approaches to proof of Covid-19 vaccination for the purpose of travel and consider the benefits of taking a collaborative approach. This is in line with the approach taken throughout the response to the Covid-19 pandemic to work closely at a political and official-level with the UK Government, Devolved Administrations and the other Crown Dependencies on matters of mutual benefit.

It became clear as the Bailiwick, along with many other jurisdictions, began to consider the options to ease travel restrictions imposed by the Covid-19 pandemic, that it would be necessary to provide proof of vaccination for those vaccinated in the Bailiwick of Guernsey.

The letter has been developed to closely align in format, content and security features to those being issued in the UK and other Crown Dependencies but with clear branding for the Bailiwick of Guernsey. The content takes into account international standards on the information jurisdictions would require verification of vaccination status. This approach has been taken to ensure that the certificates issued in Guernsey are easily recognised and accepted when used for the purpose of travel outside of the Bailiwick and particularly outside the Common Travel Area.

5b) The development of the vaccination-status certificate issued by Guernsey was debated on 16th June 2021, as noted above. No changes to the approach were directed by the States Assembly as a result of that debate.

Naturally the topic of proof of vaccination has been raised at meetings of the CCA, however details of any debate or approval cannot be made public under Section 22(1) of the Civil Contingencies (Bailiwick of Guernsey) Law, 2012, which states:

“22. (1) A person who is or has been a member of the Authority is guilty of an offence if without lawful authority he makes a disclosure of any information, document or other article which is or has been in his possession by virtue of his position as a member of the Authority.”

6. As previously noted, since the date of your request the matter was debated at the meeting of the States of Deliberation on 16th June 2021. Further, since that date the vaccination-status certificates have now begun to be issued to islanders 12 days after their second dose of the vaccine has been administered. It is now operational and is being used by Bailiwick of Guernsey residents to arrive in the Bailiwick from the Common Travel Area (CTA) without the need for testing or self-isolation.

7. Vaccination-status certification does not impact the freedom and privacy of citizens, but rather gives them the ability to travel more easily at a time where controls are still considered necessary by many jurisdictions to reduce the spread of a global pandemic. It is the choice of the individual whether they use the document to travel.

As noted above, letters of confirmation have now been introduced. Whilst public consultation was not carried out, they were developed in line with the UK, Devolved Administrations and Crown Dependencies to ensure that islanders can travel to the CTA and further afield. The data contained in the letters is aligned to international requirements for such documents which is important to ensure they are accepted by other jurisdictions.

It was a requirement that these documents were printed on-island to avoid the need for data transfer outside of Guernsey. As such, the security features needed to mitigate the risk of forgery were based on those that could be produced on-island. Despite this requirement the security features match all but one of those used in the UK's letters.

8. The vaccination-status certificate is no less secure than possessing a regular passport. Indeed, the process of getting a passport requires personal information to be submitted to the relevant authorities and is necessary to verify your identity. The provision of a proof of vaccination is merely an extra layer on this process.

A Data Protection Impact Assessment has been completed to ensure that COVID status activity is compliant with legal requirements regarding privacy and data security. A letter of confirmation will be sent out providing the dates, vaccine name and batch number for each dose.

The content of this letter has been agreed following discussion with various countries (and including the EU and World Health Organisation) to ensure its acceptance as confirmation of COVID-19 vaccination status. Further, the criteria required for international border entry, European Union border entry and UK entry from outside the CTA are aligned and agreed in standards and protocols regarding the minimum data sets to ensure the bearer of a certificate can be verified.

It is now clear that a significant number of jurisdictions have either introduced, or are intending to introduce, policies in relation to fully vaccinated arrivals which allow for reduced testing and/or self-isolation requirements. It will be for individuals to check the entry requirements of the jurisdictions they intend to travel through or to in order to consider if they are happy to comply with those requirements before they embark on their journey. The vaccination-status letter is not a passport but will enable those residents who wish to use it with the ability to prove their vaccination-status where needed.