

**Response to a Question Pursuant to Rule 14
of The Rules of Procedure of the States of Deliberation and their Committees**

Subject: Retention of Travel Tracker Data Update

States' Member: Deputy G St Pier

Date received: 12th April 2022

Date acknowledged: 12th April 2022

Date of reply: 27th April 2022

Question

In a response dated 20th January 2022 to a Rule 14 question in relation to the retention of Travel Tracker data the Committee advised that:

“Following a review of relevant data retention procedures undertaken in late December, Officers are actively working towards implementing a 90-day retention policy for all Travel Tracker data with the intention to delete data as soon as 90 days have passed since receipt or processing of such data by the Controller.”

Could the Committee please advise whether a 90-day retention policy for all Travel Tracker data has now been implemented, such that all the data is deleted as soon as 90 days have passed since receipt or processing of data by the Controller?

Response

Data retention policies are kept under active review through the COVID-19 Response Programme Board; a group of senior States of Guernsey officers, together with representatives from Alderney and Sark, coordinating the Bailiwick's ongoing response to, and management of, the COVID-19 pandemic.

The Programme Board ensures that all data sets held by the States of Guernsey as part of its response to the pandemic – be that through the integrated COVID-19 IT systems, data held on other electronic platforms or indeed data held in paper format – are collated, processed and retained in accordance with the Data Protection (Bailiwick of Guernsey) Law, 2017, ensuring that operational requirements are proportionate to the Bailiwick's evolving – and de-escalating – response to the pandemic.

A general 90-day retention policy for COVID-19-related data held outside of Travel Tracker has already been implemented to existing data sets.

In respect of the Travel Tracker specifically, a more recent review by the Programme Board has illustrated that the data set is no longer being actively used or updated, given the removal of the requirement for inbound travellers to complete Pre-Travel Assessment Forms and the cessation of the 'Local Test' feature of Travel Tracker that was used to support local businesses experiencing outbreaks. This means that any new data being captured is extremely limited and only includes new accounts being created, or existing accounts being updated with new information by users.

As such, in light of how data is now currently being utilised across the Bailiwick and across many jurisdictions, (as we increasingly move to living responsibility with COVID-19 as part of everyday life), the Programme Board further agreed on 12th April 2022 that, subject to final checks and with the exception of the limited data needed for Travel Tracker Accounts to remain active, a mass data cleanse of Travel Tracker data is to be undertaken. This will see the removal of all travel, quarantine and testing data.

This latest development has overtaken the completion of the implementation of the 90-day retention policy for Travel Tracker. The mass data cleanse should be completed by the end of May.

Data necessary for the continued use of Travel Tracker Accounts by islanders – name, address, email address contact number, Vaccine Certificate Unique Reference Number (URN) and GY Numbers – is being retained as the platform is used as the public interface with the Vaccination Administration System, allowing access to COVID-19 Vaccination QR Code which islanders may require for the purposes of travel or attending off-island events. This Vaccination Data is not stored on the Travel Tracker- it merely provides the necessary display interface for the public.

Deputy Peter Ferbrache
President
Policy & Resources Committee