

THE STATES OF DELIBERATION
of the
ISLAND OF GUERNSEY

POLICY & RESOURCES COMMITTEE

AMENDMENTS TO REGISTER OF CONTACT DETAILS LAW

The States are asked to decide:

Whether, after consideration of the policy letter entitled 'Amendments to Register of Contact Details Law' dated 2nd April 2026, they are of the opinion:

1. To amend "The States' Register of Contact Details (Guernsey and Alderney) Law 2019" by Ordinance, to add His Majesty's Greffier and the Alderney Greffier to the list of designated authorities in Schedule 2 to that Law.
2. To direct the preparation of such legislation as may be necessary to give effect to the above decision.

The above Propositions have been submitted to His Majesty's Procureur for advice on any legal or constitutional implications in accordance with Rule 4(1) of the Rules of Procedure of the States of Deliberation and their Committees.

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The Presiding Officer
States of Guernsey
Royal Court House
St Peter Port

2nd April 2026

Dear Sir

1 Executive Summary

- 1.1 The Register of Contact Details ('RoCD') is the States of Guernsey's repository of customer data across government, providing master data to support the co-ordination and communication of government services.
- 1.2 This dataset is an important foundation for the provision of services by the States. Currently, however, the verification processes around those data are not as robust or efficient as they could be. The proposed amendments seek to address this issue and in doing so improve the provision of government services, especially digital services, and end users' access to their own data in future.
- 1.3 His Majesty's Greffier ('HM Greffier'), as Registrar General, is responsible for the registration of births, deaths and marriages, which requires the provision of original documentation. By granting access to HM Greffier, the data in the RoCD can be verified against the original documentation, strengthening the data processed by other designated authorities of the RoCD across the States of Guernsey.
- 1.4 The Alderney Greffier holds commensurate responsibilities as Registrar in Alderney and communicates the data accordingly with HM Greffier.
- 1.5 The amendments to the States' Register of Contact Details (Guernsey and Alderney) Law, 2019¹ ('the Law') proposed by the Policy & Resources Committee via Ordinance will establish a clear statutory basis for HM Greffier and the

¹ Order in Council No. IV of 2020; this enactment has been amended.

Alderney Greffier to share specified data with, and access specified data kept on, the RoCD.

- 1.6 Listing the HM Greffier and the Alderney Greffier as designated authorities will enable data sharing with the Registrar to be undertaken in a more robust and compliant manner, fulfilling their statutory obligations and establishing the foundations needed to support end users in managing their data digitally in the future.
- 1.7 The Registrar of the Register of Contact Details is responsible for establishing and maintaining a secure and accurate register of contact information.

2 The Register of Contact Details

- 2.1 The RoCD is governed by the Law, which, inter alia, ensures that the RoCD is consistent with data protection principles.
- 2.2 The intent of the Law is to facilitate the establishment of a centralised repository of customer and organisation data, providing greater visibility and control to end users over the management of their data.
- 2.3 Allowing end users to readily manage their data will improve the quality and accuracy of the data and, over time, will reduce the duplication of efforts across government in collecting, storing and maintaining multiple data sets.
- 2.4 Schedule 2 to the Law lists the designated authorities which can access and use the RoCD. The designated authorities must also give the Registrar of Contact Details designated information on request. This is managed through data sharing agreements.
- 2.5 Schedule 4 to the Law lists the designated information for the RoCD, specifically the types of data that are collected, recorded or held by designated authorities such as an individual's date of birth and residential address, or the registration date of an organisation.
- 2.6 HM Greffier and the Alderney Greffier are not currently listed in Schedule 2 to the Law as designated authorities, including in their respective capacities as Registrar General and Registrar.

3 Proposed Amendments

- 3.1 The proposed Ordinance would amend the Law to the effect that HM Greffier and the Alderney Greffier would become designated authorities in Schedule 2 to the Law.

3.2 Section 4(1) of the Law states that:

“The Registrar may at any time... require the designated authority to give the Registrar any relevant designated information...”

In respect of the above, HM Greffier and the Alderney Greffier would at this stage only be required to share data limited to what is available on public registers (falling within categories of designated information listed in Schedule 4) with the Registrar of Contact Details.

3.3 Section 25 of the Law defines “designated function” as any function specified in Schedule 3 to the Law. The proposed Ordinance would consequentially amend the Law to exclude any function to the extent that the function has effect in or in relation to Sark. This is consistent with the fact that the Law only has effect in the islands of Guernsey and Alderney, and not in Sark.

3.4 This amendment is especially relevant to HM Greffier, who has Bailiwick-wide functions under several enactments.²

3.5 This change, while technical in nature, underpins a more robust short and long-term approach to data quality stewardship. At present, HM Greffier shares a list of births and deaths with various States of Guernsey entities, such as the Revenue Service and the Committee *for* Employment & Social Security, where there is a lawful basis to do so.

3.6 The proposed amendments will allow this information to be shared with a central MyGov team who will maintain and update the data in one place, becoming its custodians. Updates will then flow automatically to these entities, creating a single, accurate source of information.

3.7 Future phases will enable consolidation of this information from across the organisation, reducing duplicated datasets and unnecessary staff effort spent maintaining them.

3.8 Without this change, the current process managed by HM Greffier cannot be improved, which may in turn impact the quality and consistency of the data collected.

3.9 As the Register of Contact Details is mobilised, customers will also be able to view, update and manage their own data directly, empowering customers to self-serve. This change will support mobilising this functionality in a compliant manner.

² E.g. the Loi relative à l’Enregistrement des Naissances et Décès des le Bailliage de l’Ile de Guernesey, 1935 and the Marriage (Bailiwick of Guernsey) Law, 2020.

- 3.10 The Register will be migrated into a central repository (MyGov), enabling it to be accessed and updated by wider States of Guernsey services in future. This will deliver the first iteration of customer profile management.
- 3.11 Customer profile management will allow individuals to view, update and manage their own contact information directly, supporting greater self-service and improving data accuracy.
- 3.12 This approach ensures that the functionality is delivered in full compliance with the Law and the statutory obligations of the Registrar.

4 Review of the Law

- 4.1 While the proposed amendments constitute an interim measure to allow access to the RoCD for HM Greffier and the Alderney Greffier, further work is required to ensure that the legislation is fit for purpose across all relevant government service areas going forward.
- 4.2 The Policy & Resources Committee has recently directed a review of the Law to determine how it could further realise its potential in supporting digital adoption and achieving the wider objectives within the Digital Strategy.
- 4.3 Inter alia, it is intended that the review will enable the legislation to be future-proofed, reducing the need to bring legislation to the States of Deliberation every time minor changes are required, while maintaining appropriate checks and balances to ensure adherence to Data Protection principles.
- 4.4 The intention is to bring policy proposals on suggested changes to the Law in 2027.

5 Compliance with Rule 4

- 5.1 Rule 4 of the Rules of Procedure of the States of Deliberation and their Committees sets out the information which must be included in, or appended to, motions laid before the States.
- 5.2 In accordance with Rule 4(1):
 - a) The propositions contribute to the States' objectives and policy plans as set out in the Government Work Plan under the 'Island Resilience' area of focus, which identified 'Digital Government' and 'Effective Governance' as priority workstreams for this political term.
 - b) In preparing the propositions, consultation has been undertaken with the Registrar of Contact Details and the Data Protection service of the States of

Guernsey. The Committee has been advised that the propositions were not considered high-risk in Data Protection terms.

- c) The propositions have been submitted to His Majesty's Procureur for advice on any legal or constitutional implications.

5.3 In accordance with Rule 4(2):

- a) The propositions relate to the Policy & Resources Committee's responsibility for policies on assets and corporate services, including information and communications technology. They also relate to the Policy & Resources Committee's mandated responsibility for Data Protection, and its oversight of some customer-facing government functions.
- b) The propositions have the unanimous support of the Committee.

Yours faithfully

H L de Sausmarez
President

G A St Pier
Vice President

C N K Parkinson
S J Falla
Y Burford