

# STATES OF JERSEY

## Corporate Services Migration Policy Sub-Panel (Population Register)

THURSDAY, 20th DECEMBER 2007

**Panel:**

Deputy P.J.D. Ryan of St. Helier (Chairman)  
Deputy G.P. Southern of St. Helier  
Deputy C.H. Egré of St. Peter  
Deputy J.A. Martin of St. Helier  
Mr. P. Boden (Adviser)

**Witnesses:**

Deputy I.J. Gorst of St. Clement (Migration Advisory Group Chairman)  
Mr. M. Heald (Assistant Chief Executive)  
Mr. N. Wells (Director, Information Services)  
Mr. P. Bradbury (Director, Population Office)

**Deputy P.J.D. Ryan of St. Helier (Chairman):**

I do not think we need to read the warning on the ... we are used to I think by now. I think we would like to start with a simple question really. Will the new register include adults and children as well or are we just talking about adults of a certain age?

**Deputy I.J. Gorst of St. Clement:**

No, it is proposed that it will include both.

**Deputy G.P. Southern of St. Helier:**

Which begs the question; how are you going to include children on there? What is the mechanism?

**Deputy I.J. Gorst:**

Initially some children -- Social Security already include a record of children in some of their data. If we look at the process that is being proposed for the populating of the register it is an amalgamation or a bringing together of data that States departments already have. They will be picked up under the records of education and other records within States departments, at least of which as well will be the births, deaths and marriages register. It is this amalgamating process that should enable for existing residents, existing children, to be picked up. Obviously new entrants to the Island, they will be registered when

they enter the Island in the same way that we will pick up the adult information.

**Deputy J.A. Martin of St. Martin:**

Sorry, can I just come in there? You said existing data from education. I thought we were going to decide on, (1) not to go across all the existing data. It says in this, Social Security. I see where you are coming from, but I do not think that is what we have agreed to.

**Deputy I.J. Gorst:**

I think in one way we have got to separate out how we are going to populate the register or the index - you will have to bear with me because I am going to try to keep them separate because they are 2 separate things and I will try and refer to them as the index and the register - how we are going to populate the index in the first instance and the uses that the index or the register will be put to.

**Deputy P.J.D. Ryan:**

Yes, so that will be better, we will sort of keep those 2 ...

**Deputy I.J. Gorst:**

Yes.

**Deputy P.J.D. Ryan:**

You have slightly confused me there when you say the index and the register are 2 different things.

**Deputy G.P. Southern:**

Two different things, yes. Please explain for the record.

**Deputy I.J. Gorst:**

You will see in the document here that the 2 are separate in respect of there being this very thin index which is referred to as the Jersey Names and Address Index. You will see the proposed use of that. That is the proposed index which might be used - going through all the hoops in there - as a shared service. But obviously there will be -- and it is proposed that in the first instance the Population Office will have access to that for its register and Social Security will have access to that. But the Population Register obviously will want to include other information which will not be included in the index for sharing.

**Deputy G.P. Southern:**

The index contains the name and address? That is the thinness of it.

**Deputy I.J. Gorst:**

The name and address ...

**Deputy J.A. Martin:**

Social security number and residential status.

**Deputy I.J. Gorst:**

Date of birth ...

**Deputy G.P. Southern:**

And residential status so it is ...

**Deputy P.J.D. Ryan:**

Residential status?

**Deputy J.A. Martin:**

Yes.

**Deputy I.J. Gorst:**

That is what is proposed in this document, yes.

**Deputy J.A. Martin:**

Is there an index in it?

**Mr. P. Bradbury:**

Sorry, no, to be clear, on page 13 of the document is a table which sets out what the index will contain. The register will contain the residential status because that is solely for use by the Population Office.

**Deputy P.J.D. Ryan:**

Yes, that is what I thought.

**Deputy G.P. Southern:**

Again, I am not being awkward. I am just trying to get on the record as to what is where.

**Deputy P.J.D. Ryan:**

As far as the central bit that is shareable by other departments, it is the index?

**Deputy I.J. Gorst:**

Yes.

**Deputy C.H. Egré of St. Peter:**

The question I would ask - again we will be covering it later I am sure - is we are going to populate this index with information on adults and children. We have confirmed we are doing both adults and children. What is the process for getting that information in to make sure it is sound data?

**Deputy I.J. Gorst:**

Obviously you will appreciate that we are at the consultation stage but we have already given this some thought and it is quite a technical matching. It is going to require a technical matching process which maybe, Paul, you want to just take us through.

**Mr. P. Bradbury:**

Yes, absolutely.

**Deputy C.H. Egré:**

Just to clarify the point. We appreciate or I appreciate certainly that this is a consultation point. But at the point in this consultation it is essential, in my view, that -- consultation is pointless unless we can decide the foundation on which we are building up this process. Sorry, back to you.

**Mr. P. Bradbury:**

The proposal is that we create the database, as you know, by aligning the data set that we need for the index, obtaining that, aligning that from different departmental databases. There is some precedent or some practice in doing that in terms of creating the health screening database. It uses fairly standard software. It will match a name from one database with a name from another. If it identifies an exact match, it will be accepting that. If it identifies differences, we will be looking at where those differences are, referring back to original documentation. Because we are aligning with a number of systems, you will look at how many differences there are. If you get a match between the social security system and the income tax system but you get an exception with another system in terms of a name or an address, and that name and address is quite old, then you would accept the income tax and the social security address or name. You would also back that exercise up with a series of sample testing.

**Mr. P. Boden:**

Can I just ask a question?

**Mr. P. Bradbury:**

Absolutely.

**Mr. P Boden:**

Just the matching software, are you writing that yourselves or are you purchasing the software that does that matching process?

**Mr. P. Bradbury:**

My understanding is we own that software already.

**Mr. N. Wells:**

Yes, we have effectively already developed that software to undertake work such as developing a health screening of it.

**Mr. P. Boden:**

Which is name and address matching?

**Mr. N. Wells:**

Absolutely.

**Mr. P. Boden:**

On the back of that you expect to do a -- inevitably the software will not get -- I do not know what your match rate is going to be but it is going to be probably 60, 70, 75 per cent. I do not know, but there is going to be an element of manual intervention that is required to look at your record of information.

**Mr. N. Wells:**

Absolutely, and the level of manual intervention could be quite low level which is, for example, my name could be captured as Neil D., so where there is a match that will be accepted. Where there are exceptions, the first stage would be for someone to look to understand what that data means.

**Mr. P. Boden:**

What is your acceptance criteria on a match that you can just do automatically without referring to it manually?

**Mr. N. Wells:**

It would be more or less a precise match. In terms of our address data that would be very, very clean because we have been using that software for some time to look at addresses across the Island.

**Mr. P. Boden:**

But the name ...

**Mr. N. Wells:**

Yes, the name.

**Mr. P. Boden:**

You have obviously got to get the name as well but to get an automatic match you have got to have 100 per cent consistency between the name and address of that individual.

**Mr. N. Wells:**

Yes.

**Deputy P.J.D. Ryan:**

But surely if both those names and addresses have been keyed manually by different people you are going to get ever such slight differences in punctuation or even spacing between a word. How practical a method is that? My experience of data is that inevitably I would think that 70, 75 is very high. What do you believe it will be?

**Mr. N. Wells:**

From the evidence that we have seen so far, because we have done work on health screening and we have compared address data between that database and Social Security, I would expect it probably to be 30 to 40. But when you look at the exceptions, which is before your eyes, you can spot the inaccuracies and you can see the bits that have to change.

**Mr. P. Boden:**

The difference is if you use one database as a definitive database as being the most accurate, as soon as you start matching 2 databases together then you are creating a problem for yourselves, are you not, by doing that exercise?

**Mr. N. Wells:**

No, you are bringing 2 databases together and validating them.

**Mr. P. Boden:**

Do you use it as validating? So you are always going to try and do that. Are you going to try and incorporate as many different databases to do that validation exercise then? I am not sure which ones you are using. You are using the Social Security database, you have mentioned.

**Mr. N. Wells:**

Social Security, Income Tax and we have some set out in the document. Health would be another. We are searching those prime documents which we believe do tap the residents on a regular and contemporary basis.

**Mr. P. Boden:**

So there is no one master database that you are going to take. You are going to take those different data sets and bring them together, do the validation exercise to produce a unique record for an individual name and address.

**Deputy P.J.D. Ryan:**

Do you have an estimate of the human resources required to do this validation yet? Have you estimated that?

**Mr. P. Bradbury:**

The estimate we have got at the moment is 2 people for a single year.

**Deputy P.J.D. Ryan:**

For a year?

**Mr. P. Bradbury:**

For a year.

**Deputy P.J.D. Ryan:**

Have you compared that with what it would take to start from scratch?

**Deputy I.J. Gorst:**

Yes, we have. I mean, I think possibly the only process that we have got experience of as starting from scratch is the census but I think if we look at a starting from scratch process, the number of man hours involved to create the census it is -- we employed last time round 181 people. It involves knocking on doors. It would involve at that stage validating people's identity to that high degree. Although you might look at some of the data that Neil has just spoken about and the manual intervention that is required, I think when you compare that against the number of man hours and the involvement required for populating it from scratch it falls to a very insignificant amount.

**Deputy C.H. Egré:**

Has a risk assessment been carried out against the data mix that you bring together? I would expect the juncture to say: "Okay, we are going to bring in 4 databases", for example, but we would have a risk element attached to that because you are not starting from pure raw data. You are starting from data that has already been input and not necessarily validated correctly. Has a risk assessment been done on the potential for a problem?

**Mr. N. Wells:**

When you talk about a risk assessment, the process of bringing the data from, say, 4 sources which all currently claim to be accurate is in itself a validation and I think an extremely worthwhile exercise because the result of doing that validation, that matching, is a benefit to all 4 departments.

**Deputy C.H. Egré:**

In effect what you are saying is there would be a risk there but it is minimal?

**Mr. N. Wells:**

Yes, I think the ... yes.

**Deputy C.H. Egré:**

Again just for confirmation, we have mentioned the data set. We talked about name and address. I assume that the data validation will be done across the full 8 components within the index?

**Mr. N. Wells:**

Not all current databases would hold all of that data. The principal elements would be the name and address which those systems would hold.

**Deputy C.H. Egré:**

But, again, quite a few of them would have date of birth, not necessarily place of birth, gender. You would be looking at the best match you possibly could to do that validation.

**Mr. N. Wells:**

Yes, absolutely. That in itself would help resolve the issue that I might be Neil D. as my Christian name in one and Neil in the other because the date of birth would be the same and there could be other identifiers.

**Mr. P. Boden:**

Yes, but the issue of the deceased and gone aways in those files as well. In every one of your databases I am sure you have got a deceased issue and you will have a gone aways issue. That is going to require some element of validation as well so that those people that are not resident on the Island, those people that are deceased but that sit within those databases, is that part of the processing and the validation process that you are ...

**Mr. N. Wells:**

Of the creation of the index?



**Mr. P. Boden:**

Yes.

**Mr. N. Wells:**

Yes, the validation process will be ensuring that we have accurate addresses and we have accurate people linked to those addresses and they are resident.

**Deputy C.H. Egré:**

But going back to my original question which was process, when the index is completed and validated what process do we have in place to make sure that is maintained vis-à-vis what processes will be in place against the births and death register? What are you envisaging happening? Who is going to be doing that?

**Deputy I.J. Gorst:**

As in the alignment or the activity? I mean that is ...

**Deputy C.H. Egré:**

The activity if someone has died or someone has been born. Who is picking this up and saying: "Okay, here we go, we take him out and we put him in or her?"

**Deputy I.J. Gorst:**

We propose to have a centralised function with controls and security around that as being the best way to ensure that that is done accurately. Obviously there are issues around with all of this, that it is only the appropriate person that is making any changes or viewing the index and the register as well. But some of the issues will be technical about flagging up when an activity has taken place. There will be a requirement to change, let us say, your address centrally. I think at this point our view is that the best way to make sure that is accurate and secure is to do it centrally proposing either at Cyril Le Marquand House or at Social Security.

**Deputy J.A. Martin:**

Going back to populating the register or the index - and it has been in the papers; in your papers not in the paper - you talk about doing it from fresh data. You talk about it on a census basis, people going out in the community. To me, I still maintain it should be all clean data but why can it not be people bring it -- if your Social Security card is invalidated by, let us say, mid-2009 when all the laws are passed, you have got a year or 2 to work in that you ask people either alphabetically or what you know to come in and validate and get their new registration card. It is not rocket science. I put it to you that it is not politically acceptable but it would be the best way to populate it.

**Deputy I.J. Gorst:**

I think it comes down to there are a number of issues but fundamentally it is about convenience. We are then saying to our residents and our customers that we already have this information about you but we want you to supply it again and we want you at that point to bring in a form of validation as well. The data that we have already got has gone through some validation process. The vast majority of it is being used on a day to day basis with people's Social Security contributions, people's I.T.I.S. (Income Tax Instalment Scheme) contributions. It has that validation element to it anyway.

**Deputy J.A. Martin:**

It is the initial validation though, Ian.

**Deputy I.J. Gorst:**

We already have the information on people.

**Deputy J.A. Martin:**

Social Security up until the last year or 2 have been so lax that the validation of anybody turning up saying: "I want a Social Security card" basically got one. When you start validating on the wrong name or a name reversed, second name becomes first name and third name. People know who they are. How are you validating that if they just come in or they just change address? They are still the wrong person and you do not know who they are. That is not necessarily for numbers. It is for security reasons. We need to know straightaway the validation is at least a passport. That has not been happening for Social Security. That is what worries, I think, a lot of the panel that you go into Social Security, which has been one of the laxest about giving out cards to people, not maybe in the last 12 months but certainly before that.

**Deputy I.J. Gorst:**

This is why we are using an alignment process to bring in more than one piece of data to cross-match it and to cross-check it. Let us say with the Income Tax Department it is going to be unlikely that people are inaccurately recorded on that because it is what they pay tax on. There is a big incentive that that is higher levels of accuracy.

**Deputy G.P. Southern:**

That statement is grossly naïve, I think. If I do not want to pay tax in this Island, what I do is I get myself 2 separate Social Security cards. I work half a year on one name and another half a year on the other name. I am clean with the Income Tax Department but I am working under 2 names. Under neither with exemptions do I pay tax whereas if I worked all the year on the same name I would be paying tax. A simple scam. How do you know that is not occurring and has not occurred, because certainly there are no proper identity checks in many cases for Social Security cards? That could come

into play and I believe does.

**Mr. P. Bradbury:**

I suppose on the one hand, yes, there are various permutations. We are going to have to design that into the alignment process. I think I would also say that we are not going to align the data and that is it. The proposal is that over a period of time, by 2014, we will expect every individual to come in and verify who they are. We are just saying we do not wish to get 90,000 people - 70,000 adults - through the door within a very short space of time because we do not feel as though that is practical.

**Deputy G.P. Southern:**

Is it not a fact that the best way and the cleanest way is to start with clean data? Anything else is a compromise and fudges issues, but that doing it with clean data and making sure everybody validates is perhaps a more expensive way. You are cutting corners already. Ultimately, are you not going to have to eventually have everybody validate properly with some form of identity? If not everybody then almost everybody. We accept that you are on this but, hang on, we have never seen any, let us say, passport to back that up. Ultimately, whether you do it at the beginning and do fresh data - clean data - or whether you do it at some stage in the process and towards the end perhaps, ultimately people are going to be going into an office in front of somebody and saying: "I am who I am. Here is my proof." Are you not just spreading the cost? I think it is just spreading the job over a longer time period and in the process making it more complex and less efficient.

**Deputy I.J. Gorst:**

I would say the reverse.

**Deputy G.P. Southern:**

Please explain.

**Deputy I.J. Gorst:**

We are making it less complex and we are making it more convenient and it is less costly. But you are right. By the end of the day somebody has an activity - they might have moved house - and they can prove their validation at that point or they get towards 2014 and they need to be issued with a combined card. But it is a balancing act of the process. I think we have got to remember, from my perspective, we have already got information about people.

**Deputy G.P. Southern:**

We have got information that we have not validated fully, do we not? How many records are on the Social Security database? A damn sight more than 90,000, are there not?

**Deputy P.J.D. Ryan:**

How many are there?

**Mr. P. Bradbury:**

A broad range, there are 300,000 to 400,000 records in the Social Security system but they all have different statuses.

**Deputy P.J.D. Ryan:**

What are those statuses, please, do you know?

**Mr. P. Bradbury:**

I do not know the exact status but certainly there is an active and an inactive status.

**Deputy P.J.D. Ryan:**

Do you know how many active ones there are?

**Mr. P. Bradbury:**

No, I do not.

**Deputy G.P. Southern:**

Can I bring it back to; is it not the case that ultimately everybody will have to validate their identity at some stage? They will have to come into an office with a piece of identification and say: "Here I am. This is my mug shot. This is me. This is my passport. I am who I am and, by the way, here is my address."

**Deputy I.J. Gorst:**

That is what the current proposal is, that it is balanced out.

**Deputy G.P. Southern:**

You think that is a balancing out? You have got to do that job anyway with everybody at some stage but nonetheless you are starting with dirty data which is not recommended, that is not the ideal way to start, for the sake of that compromise.

**Mr. M. Heald:**

I am not sure we are starting with dirty data. I think we have got a good core of data that we are using to interact with our citizens on a regular basis. There are going to be issues around the margins quite clearly but this is a huge bureaucratic exercise to do it from day one, if that is what we want to do. If we want to set up a huge -- and I agree it may not have to be a census is going to be brought, people are

going to have to come in. We have to follow up those people who do not come in, et cetera, et cetera. It is going to be a huge and lengthy exercise. I think there is going to be quite a high cost to that.

**Deputy P.J.D. Ryan:**

We are talking about cost and inconvenience as to the decisions you made. Are there other reasons why you have chosen to use ...

**Deputy I.J. Gorst:**

I think there are some issues. Geoff keeps using the term "dirty data".

**Deputy G.P. Southern:**

The opposite of clean data which is the recommended way of proceeding.

**Deputy I.J. Gorst:**

He outlined a potential issue or what he perceives that people have done potentially in the past. But I think we have got to think that the vast majority of people who are recorded on States databases are quite happily now interacting with that information and they are satisfied that the information is correct. It is working for them on a month in, month out basis.

**Deputy G.P. Southern:**

Can I just finish off what I was saying? Could you address the question that I was proposing to you about somebody who has got 2 Social Security cards in slightly different names and works 6 months on one and 6 months on the other and pays no tax, because I know people who have done that?

**Deputy I.J. Gorst:**

They will both be registered and that single person will be showing as at the one address.

**Deputy G.P. Southern:**

You are going to chase them down and decide which one they are?

**Deputy I.J. Gorst:**

As we have said there will -- I do not think it is a pinnacle or a cone. You will have processes at the bottom which can be dealt with on the automatic alignment process but at the top you will have a small number of people that you will have to deal with on a more manual and an individual face-to-face basis.

**Deputy P.J.D. Ryan:**

The overall concern then, just to generalise this particular issue so that we can be clear on it, is this duplication of names that there is to some degree on the Social Security register. Have you done any

resource implications on how much time you are going to have to dedicate to dealing with the small amount of inaccurate data? I think we all accept that there might be a majority chunk of clean data. That is not going to cause the major problem. We suspect you are going to have to spend quite a lot of time on the dirty data. Have you assessed that amount of resource that you are going to need? Personally, it does not sound to me as if 2 people for a year is going to be enough. Have you done an exercise to look at that?

**Mr. N. Wells:**

Can I endeavour to answer that? The premise of the work that we are doing is that we are creating this database. Where there are exceptions, where we are highlighting the 2 names at one addresses, there has been an expectation that effectively that would be supporting the host department which could be Social Security or it could be Income Tax --

**Deputy P.J.D. Ryan:**

You would take resource from those departments?

**Mr. N. Wells:**

-- to enable them to follow because I am assuming that procedures already exist.

**Deputy C.H. Egré:**

Just a point, Neil, that I was going to bring up earlier. Within your data alignment programme, I assume there will be a facility for flagging the very sort of error that we are saying is there. Therefore, it is not going to be a manual review of this data. It is the fact that an objective computer software system is going to come up, flag it up and we will then take the appropriate action following that flag.

**Mr. N. Wells:**

Yes, and some of that may be done on the departmental databases because it will be giving them good data.

**Deputy G.P. Southern:**

The Chairman just referred to we already have core, clean data. We do not have any clean data. We have got data collected for other purposes and validated either loosely or not at all, effectively. We have not got any clean data and that is the issue. Can I just come on to the issue of numbers then when you are saying that there will only be a very small minority of cases where you want to investigate? We look basically at something like an inflow and outflow of something like 12,000 into the Island and 12,000 out of the Island in any one particular period, let us say yearly, annually. In addition to that you have seasonal workers coming for a 6 month spell and leaving again. Again that is an area where the dual name issue, yes? Somebody who has got 2 cards works 6 months doing one job and 6 months doing

another under 2 names does not look like the same person. It looks like somebody is doing seasonal work and has gone away and then somebody else with a similar name comes and does seasonal work for another 6 months and then goes away. They look identical. There is no automatic check built into that one. We are talking about perhaps 12,000 people in and out of the Island in any particular period. We are also talking about - and I have been looking at this with the electoral register - people move home; particularly in the urban areas. They move home. They do not tell people they have moved. Eventually they get around to saying: "Right, I suppose I better contact the Parish." It is the last thing on their list of things to do when they move. There is an awful lot of movement in terms of addresses. There are also a substantial number of movements, either seasonal workers or the usual in and outflow of names and people on a basis. There is a lot of information there. How are you going to cater for that?

**Deputy I.J. Gorst:**

One of the things that I pick up on there is your contention that the electoral register is not as accurate but the Connétables ...

**Deputy G.P. Southern:**

I have just done it. On 2 fairly stable blocks of flats in St. Helier 45 per cent of the flats were registered; 45 per cent, 5 per cent of them had changed address since the last register was performed. It is woefully inaccurate. People do not register. They do not get fined. Nothing happens so people do not want to register. They are supposed to register but they do not. We send out letters to the occupier time and time again. Again, it is a separate question, but how do you deal with, okay, you are going to make this accurate. You are going to make it accurate because we need it to be accurate. How are you going to do that because people do not register for elections if they do not want to? Nobody chases them. They are chased but still I mean ...

**Deputy J.A. Martin:**

It is the enforcement question.

**Deputy G.P. Southern:**

Enforcement, yes. Personal numbers -- the large numbers of people either in or out of the Island. Changing addresses is the second one and then, thirdly, enforcement.

**Deputy P.J.D. Ryan:**

How serious an offence would it be to hold 2 identity cards? Not identity cards but 2 names and address index cards with different numbers on them but you know you hold 2 in the same way as somebody might hold 2 Social Security cards with different numbers on them. How serious an offence is this going to be?

**Deputy I.J. Gorst:**

I think the first thing to say is it is a carrot and stick approach. It will be a criminal offence not to be registered but obviously the registration will give you access to accommodation and employment. I mean these are ...

**Deputy P.J.D. Ryan:**

Do you have an amnesty to start with? Is there a period of time where perhaps they will say: "Look, anybody who has got 2 cards, here is an amnesty. Nothing will happen to you, just surrender the wrong ones" or something?

**Deputy I.J. Gorst:**

When you say 2 Social Security cards.

**Deputy P.J.D. Ryan:**

If you studying Social Security data that is where it starts, I would have thought.

**Mr. P. Bradbury:**

I think you would adopt a reasonable approach. I do not believe from day one you can say we are going to prosecute everybody who has got 2 Social Security numbers. I imagine we would take a pragmatic approach. In terms of the question of how do you keep the register up to date, we have clearly got issues now in terms of individual departments on their own trying to keep their data up to date. The first thing you do is you place an obligation on the individual to register. The second thing you do is you place an obligation on the landlord and the employer to make notifications; notifications to the same index, not separate indexes like now, and you have this link with the other States services.

**Deputy P.J.D. Ryan:**

Are we creating a whole load of extra bureaucracy for landlords?

**Mr. P. Bradbury:**

Landlords already have to -- there are already obligations on them under the housing law to obtain consent for that individual to lease their property. There is already a form that has to be filled out by both parties and 2 consents which have to then go out to both parties. Employers have to check or should to be checking the residential status of the people they employ so they can confirm that they are in compliance with the Reg. of Uns. and they are compliant with Social Security.

**Deputy J.A. Martin:**

There is no check on the man with the house and the 4 rooms that he is renting out to lodgers. He has to apply for no consent. That is the biggest black area in the whole of the -- this is why we are doing this, I



think.

**Mr. P. Bradbury:**

I agree. In terms of the uncontrolled this is quite right. This is an additional step further but those obligations are on the (several inaudible words). Yes, it takes it forward.

**Deputy C.H. Egré:**

How are you going to address that particular problem?

**Deputy G.P. Southern:**

In terms of using data that is already around, that is fine. You change the law. You say you must do this, right. That is one way of doing it. That is doing it the clean way. Messing around with Social Security/housing records/anybody else's records is not as straightforward and more complex.

**Mr. P Boden:**

I will just make a point there. You referred to the margins. The issue is going to be around the margins. That is where the data is most interesting to you is around the margins, is it not? I do not know what that percentage is. Is it 10 per cent, is it 15 per cent of the population that you classify as the margins? But those are the people that are possibly the most interesting or the most important to get on to the new register.

**Mr. P. Bradbury:**

I think to some extent what this exercise will show us is those people on the margins, that the individual departments at the moment do not know about because we will do that exercise.

**Deputy C.H. Egré:**

The point of my question of 3 conversations ago; how are you going to address the particular problem of not knowing how many people are staying in lodging houses and what sort of percentage do you think exists in the Island at the moment that fit in that bracket, because I think it is reasonably high?

**Mr. P. Bradbury:**

I think the register of lodging houses is fine.

**Deputy C.H. Egré:**

We are not there. We have done that one. It is the ones that are not.

**Mr. P. Bradbury:**

It is the individual landlords who take less than 5 lodgers.

**Deputy P.J.D. Ryan:**

We are running a little bit out of time.

**Mr. P. Bradbury:**

There will quite simply be obligations upon those landlords.

**Deputy P.J.D. Ryan:**

There are several questions that I want to ask that are on the list. Although I do not want to stop questions, if we are repeating questions that are slightly different then I think you should try and move on because there are lots of questions to ask.

**Deputy G.P. Southern:**

I do not believe we have had the questions of what are the numbers of people on the margin, the 12,000 in and out, et cetera.

**Deputy P.J.D. Ryan:**

That was one of the questions I wanted to ask, yes.

**Deputy G.P. Southern:**

We have not answered the enforcement. How are you going to make sure it is any more accurate or any less accurate than the electoral register, for example, which the Constables make efforts to keep accurate but failed in the urban areas? But then we have also, you just talk there about again this clarity, this distinction, between the names and address index and the register. You were talking about the multiple uses of the -- it seemed to me you were mixing the 2 up again. If you are starting with somebody else's database collected for a different purpose, then are you entirely sure that you have satisfied the Data Protection Commissioner in terms of that data should not be used for another purpose or by another department? Yes, you seem to have got round that problem by saying we have now got a names and address index and that is so minimal as to be safe but then you just refer to: "and the other departments which are using it." What is the relationship between the names and addresses index and the register that gets around the data protection issues? I think you should not be using data collected for one purpose for any other purpose because it belongs to the individual and they have to give you permission to do it. Are you sure you have satisfied the Data Protection Commissioner that you have addressed those issues properly and accurately?

**Deputy I.J. Gorst:**

I think it is important to say that the Data Protection Registrar has had input on workshops in the development of this document. But she will as well be a formal consultee and we will expect to receive

her comments on that. The satisfaction, as far as I understand it, is around making sure people are informed and are aware and a law round it and that it is appropriate and that it is reasonable. This is one of the reasons why we have launched a consultation document, so that the public at large are aware and are able to make an informed decision

**Deputy G.P. Southern:**

And are aware that the Data Protection Commissioner has been involved in your workshops. My question was; at this stage are you confident that you have addressed her issues because she had serious issues with what you are attempting in the first place? You have changed track quite substantially to accommodate those. At this stage, are you confident that you have met her reservations?

**Deputy I.J. Gorst:**

I was not personally at those workshops. I think though it is important that we do not in some ways - although Mike can answer that - we do not try and second guess because we do want to have her formal response which will be made public and will help inform the public debate as well.

**Deputy G.P. Southern:**

Can you answer the question: are you confident?

**Mr. M. Heald:**

We very much listen to the Data Protection Registrar. In fact, the principle was around clarity. I think the original Migration Policy kind of said we will have a population register and we may be able to use this for good government services in the future perhaps. Emma was quite influential in the group. We all supported that, and let us turn this around and let us be upfront and clear and put it in legislation. If we going to have a shared thin set of information let us be clear, upfront and honest about it. Let us be clear about what it is going to be used for, how it is going to be created and who will have access to it. In that sense, yes, I am confident. I mean I know that she will have issues about some of the things we have talked about today. We are aware of that. We have talked through that with her. So, yes, I am certainly confident.

**Deputy P.J.D. Ryan:**

I would like to tidy up a few more general questions. We can always come back to this, but we have skipped a couple and I would like to get them answered. Newcomers coming to the Island; how will you enforce them being registered with the Population Office and the Social Security Department? Newcomers.

**Mr. P. Bradbury:**

Essentially that is the process I talked through before. Not being able to access work or accommodation

and also as and when they access other States services that their being flagged on the index.

**Deputy P.J.D. Ryan:**

Fine, thank you. Current employers are not very good at returning Social Security cards. Will this be the same with the -- what are you calling this card, a population ... do you have a name for it yet?

**Deputy J.A. Martin:**

Combined Registration Card.

**Deputy I.J. Gorst:**

Registration Card.

**Deputy P.J.D. Ryan:**

How are you going to stop employers -- I mean presumably do employers keep hold of that registration card in the same way they do Social Security cards? No?

**Deputy I.J. Gorst:**

No, it is proposed that there will be an amendment to the Social Security law which no longer requires employers to retain the cards.

**Deputy J.A. Martin:**

What about the landlord?

**Mr. P. Bradbury:**

The individual will be responsible for the card. They will be responsible for showing that card when they access employment or housing to show their residential status and their Soc. Sec. number.

**Deputy P.J.D. Ryan:**

So employers will typically take a photocopy of it and keep it on record that way?

**Mr. P. Bradbury:**

Yes.

**Deputy P.J.D. Ryan:**

Okay, that is fine.

**Deputy G.P. Southern:**

When people have lost their card? It is a physical card, is it not?

**Deputy I.J. Gorst:**

That is right, yes. The process around when somebody loses the card is in some way connected with the intrinsic value of the card. Because it has not got a photograph on it, or it is not being proposed that it is an identification card, in all likelihood people when they are using their card will also need to use it with another form of identification. We perceive there will be little value in the card so it should be a relatively simple reporting of a lost card and a relatively ...

**Deputy G.P. Southern:**

This is a card that entitles me -- tells me where I can live and what job I can do and you are saying it has got no value?

**Deputy P.J.D. Ryan:**

Excuse me, there is a whole raft of questions on the security issues. If we keep that to a separate section because we will come back to it. We will revisit that in a moment when we look at security. I just want to tidy up all of the other ones that are in here. Those that are unable to produce a passport when they want to register; will there be a procedure, according to the consultation? What is that, please?

**Deputy I.J. Gorst:**

That is right. The Customs and Immigration already have a procedure that they go through for when people do not have a passport, or first time applicants for a passport which is around various pieces of documentary evidence right up to having a physical interview with the person. It is proposed that those procedures will do.

**Deputy G.P. Southern:**

Have you done any work on what the size of this problem might be because I certainly know there are many people at one end of society who do not have a passport, who do not have a driving licence, and have tremendous problems ever opening a bank account because the banks simply do not believe that they have got nothing that can say. It is a damned hard job. Have you done any research on the size of the problem with how many people in our society have not got photographic I.D.?

**Deputy I.J. Gorst:**

Obviously it is not an easy number but Customs and Immigration have indicated that it is only roughly one per cent of application passports that they deal with that are new. I think their other estimate is that around or over 90 per cent of the population have passports.

**Deputy G.P. Southern:**

So it would be of the order of between 800 and 8,000 people who may have difficulty proving their

identity?

**Deputy I.J. Gorst:**

As I say, they are the figures that we have got from Customs, so that would correlate to what you are saying.

**Deputy G.P. Southern:**

Thank you.

**Deputy P.J.D. Ryan:**

One other one, how does this cross-reference against the future use of the Jersey census?

**Deputy I.J. Gorst:**

It is not proposed that it will have any effect on either the planning or the future delivery because the census collects a whole host of information about people. This is proposed that it is -- again we are coming back to that very thin, narrow amount of information. One thing I can say about the census is, again, it will be hopefully a good validation tool of the numbers that we have got on the latest ...

**Deputy G.P. Southern:**

Provided that you set it up to cross-check because you will be halfway through your process or wherever.

**Deputy I.J. Gorst:**

When is the next census?

**Deputy G.P. Southern:**

2011, is it not?

**Deputy I.J. Gorst:**

Yes.

**Deputy G.P. Southern:**

You will be halfway through your process. If you set up appropriate questions in the census you can use it to help you build a more accurate system.

**Deputy P.J.D. Ryan:**

I think Deputy Southern particularly is referring to this one anyway, but I will ask the same question again for the sake of clarity. Does the index identify any associations between individuals other than

same address? This is the fraudulent cases really that we are talking about. How confident are you that you will be able to pull these out, that they will fall out of the system sideways and you will have to do something about it, father, son, mother, daughter?

**Deputy I.J. Gorst:**

This is where for the index it is not proposed that this information is held because again we are sticking to this very narrow band of data. But obviously for the Population Register one will need that because family relationships can grant people status.

**Deputy P.J.D. Ryan:**

So your head of the household and work from there.

**Deputy I.J. Gorst:**

That is right. But, just going on to say, that that will mean that other departments that in future want access to the index will not have access to that which might be considered more sensitive information. That will just be on the Population Register.

**Deputy P.J.D. Ryan:**

What will be the specified length of time that is referred to in the consultation document before an individual is flagged as a potential leaver?

**Mr. P. Bradbury:**

Between 6 and 12 months, but to some extent that will depend upon the individual who is inactive. Somebody of working age who has worked for the last 10 years, and is still of working age, if they are not on Social Security return or the combined return for 2 periods you would flag them as inactive. Somebody of over pension age you may have a longer period, a 12 month period.

**Mr. P. Boden:**

Does that solve the deregistration issue with the register in terms of people moving away from the Island? Deregistration is always an issue with the population registers. If you are not clearing off those people who are leaving then your registration files and your index file is going to be less accurate.

**Mr. P. Bradbury:**

It is a challenge that States departments have now. I think what this does, this presents an improvement in that it is ...

**Mr. P. Boden:**

It is not so much of an issue now, is it? What the index is trying to be is a definitive register, definitive

index, of the people resident on the Island at any given point in time, which is not so much of an issue with your Social Security database.

**Mr. P. Bradbury:**

Sorry, I am not trying to be obtuse but I suppose my point is Social Security already do exit people because then they no longer chase them for liabilities. What this will do is it will look across the States services that are using the index for inactivity. They will basically be saying after a period of time - 6 or 12 months - no service has been accessed at all by an individual, therefore, they will be exited or archived off the index. Then other departments which currently do it on their own can place some reliance on that exercise.

**Deputy G.P. Southern:**

That is quite significant increase in the role of the government in monitoring people, is it not, than hitherto? That is a substantial change.

**Mr. P. Bradbury:**

I am not sure -- I would say it is keeping the database ...

**Deputy G.P. Southern:**

It is a political question I think because it is an issue for the politicians, not necessarily for the officers who are just doing what they are asked to do.

**Deputy I.J. Gorst:**

The whole setting up of the index and the register is a political question. It is a venture that we do not currently perform. But I think it is a matter of balance; what we can achieve and ensuring that the index and the register is accurate. That is a very important point. Coming with that accuracy in a real time basis will mean that there will be a need to follow up and to ensure that we are certain when people are leaving.

**Deputy G.P. Southern:**

Accuracy is something that -- there is in law a requirement on you to maintain an accurate database. That is part of the data protection law. The balance though is between -- is a wider one than that. It is not just about accuracy. It is between convenience for the government not knowing who is here and the rights of the individual to allow you to know who is here and to monitor, effectively, their activity. That is the balance, is it not?

**Deputy I.J. Gorst:**

The balance -- there are lots of broad issues and small issues which need balancing, is there not? There



are the civil liberties issues with accurate information, not only for government to make good decisions but also for the general population to understand what is going on within their society and them being informed to also make informed decisions about where they want government policies to go.

**Deputy G.P. Southern:**

It is ultimately being introduced for the convenience of the government.

**Deputy C.H. Egré:**

Can I just mention that, in effect, what you talk about, there is an overlap here, right? How confident could you be that your database is accurate if you do not have this element of flagging up the fact that inactivity has taken place? That was the question.

**Deputy I.J. Gorst:**

It would be much more difficult to ensure it was accurate because how would you then -- the onus would then be entirely upon the individual to report to you or to report to the central area that they were leaving.

**Deputy P.J.D. Ryan:**

Is the index going to store a history of addresses? Is there going to be a history component?

**Deputy I.J. Gorst:**

It comes down to the same thing with association. The index will not, because it is just proposed that it will store - again come back to this central, thin piece of data. But again the Population Register will need to retain historic information about people's addresses because that is again part of validating somebody's residential status over the longer term.

**Deputy P.J.D. Ryan:**

Sorry, maybe I picked up something, but I think that one of your officers was saying: "No, it will not carry any history" but I think you are saying it will.

**Deputy I.J. Gorst:**

No, it will not. I mean these ...

**Deputy G.P. Southern:**

You just said you will.

**Deputy I.J. Gorst:**

No, I did not. I said the index will not.

**Deputy G.P. Southern:**

The index.

**Deputy I.J. Gorst:**

The index will not but obviously for the Population Register just like links between family members are important because of residential status, so historic proof of living on the Island is important for residential status as we currently do and has in the Housing Department.

**Deputy P.J.D. Ryan:**

A fairly obvious one particularly prior to I.T.I.S. - probably a little bit less important now but it is probably still important - is the question from an income tax point of view where you would have someone that had earned money in Jersey that left and finding an address for them somewhere perhaps in the United Kingdom, or somewhere else in world, to get back tax that was due, for example. Will there be some kind of facility for doing that or are we talking about incentivising people even when they leave the Island to tell us where they are going or something like that?

**Deputy G.P. Southern:**

Tell you where they have gone. I am leaving, bye.

**Deputy I.J. Gorst:**

That is right. Picking up on some of the points that Geoff was making there, we have thought about incentivisation or at least facilitating people or making it easy for them to notify us when they are leaving, around the idea of leaving exiting forms with maybe banks or places like that to try and ...

**Deputy P.J.D. Ryan:**

That could be a carrot. Is there a stick though that you have got to -- have you got leverage?

**Deputy I.J. Gorst:**

There is not currently in this proposed to be a stick but it might be. We have thought about it.

**Deputy P.J.D. Ryan:**

Are there any sticks available to you that you have identified?

**Deputy I.J. Gorst:**

There are none that we have identified at this point but it might be that people do identify them that we could ...

**Deputy P.J.D. Ryan:**

I mean an act of terrorism, laws. I mean the whole world is becoming much more security conscious. Citizens are being tracked generally much more. It is interesting.

**Deputy G.P. Southern:**

Can I develop that a minute because the fundamental question is that you have just hinted on finding out where people have gone to by sharing somebody else's database.

**Deputy I.J. Gorst:**

Yes.

**Deputy G.P. Southern:**

Either as the names and addresses index or as the Population Register, to what extent is that information not just going to be shared within our government but with other government, because that is a key element? Have you considered if somebody is chasing a terrorist from the U.K. and wants to know if they have come to Jersey, are they not going to ask you to search your names and address index to see if they ...

**Deputy I.J. Gorst:**

There is no proposal.

**Deputy P.J.D. Ryan:**

We have got T.I.E.A. (Tax Information Exchange Agreements). Is there any thought that we would have a name and address exchange information agreement?

**Deputy I.J. Gorst:**

No, there are no proposals in this document to do that. I think it is not really the reason it is -- the Migration Advisory Group, you are talking here about other issues that --

**Deputy G.P. Southern:**

If we have a register ...

**Deputy I.J. Gorst:**

-- are concerned with Home Affairs and the Attorney General and ultimately the Royal Court and all those types of issues.

**Deputy G.P. Southern:**

Have you sought the advice of the A.G. (Attorney General) on that possibility, on the scope or absence

of scope for sharing with other governments any of the data that you are proposing?

**Mr. P. Bradbury:**

We have been quite clear throughout that the objective of this is to improve public service, public administration, managing migration. We have always been clear that it is not about policing or border control or security. We have been clear with the A.G., with the law officers and various other people as we have been through this proposal.

**Deputy G.P. Southern:**

The first time a foreign government asks you to check your register or your index for X, or whatever programmes, you have examined that and it is absolutely clear that there is no way any foreign government can say: "Can we have a look at that?"

**Deputy I.J. Gorst:**

As I say, that sort of question I do not believe is the remit for the Migration Advisory Group. It would revolve around what current laws we have or agreements that we have. It would, as now, I imagine - and I am moving into territory that I do not know about it in any great depth - is those foreign governments would approach the Attorney General as they do now for information that the States currently hold. I do not ...

**Deputy G.P. Southern:**

So we have not got an answer here but will you address that issue so that before you come to the States you can say: "We have cleared this up blah, blah. This is the situation"?

**Deputy I.J. Gorst:**

No, it would be more appropriate to ask ...

**Deputy P.J.D. Ryan:**

I think this is something that we would be more appropriate to ask the Chief Minister in general question time.

**Deputy I.J. Gorst:**

It is about international relations.

**Deputy P.J.D. Ryan:**

Yes, it is, so we will just lodge that one, but it is an interesting point. Thank you for your comment.

**Deputy J.A. Martin:**

I have just got a couple of practical questions. On your property register: "All properties will be issued with a residential category." Who will do that? At the moment you only have the obvious 2. It is the one in the middle I am worried about, the silent house. What will that be called? Have you considered that? The second practical question: on your qualifying work years at the moment, under working, it is 5 years and under the old proposals it was going to go up to 10. Is this still being the situation -- it was going to be if you were 5, then add a year. So, after 5 years, housing and working were all going to be in line at 10 years. Is this all going to be still done under the -- business licences ...

**Mr. P. Bradbury:**

Can we just go back to your ...

**Deputy J.A. Martin:**

The original all properties? Who is going to ...

**Mr. P. Bradbury:**

Which page are you on, sorry?

**Deputy J.A. Martin:**

Sorry, page 19: "All properties will be issued with a residential category." Firstly, whose job is it to do that and why only 2? The clear 2 categories is your lodging house or you own your own house and that is fine. My question is where is the one in the middle? What is that going to be called? Who is going to decide?

**Mr. P. Bradbury:**

I am not trying to cut it short in any way. The migration policy dealt with a whole host of things. We tried to cut it into 2 parts. This is part one about the registration and part 2, that is what section C is, is this flagging that we are going to come back and consult on that.

**Deputy J.A. Martin:**

Yes, I know, there is going to be more coming.

**Mr. P. Bradbury:**

But I agree, there is a third category which is controlled accommodation where people have lodgers that we need to address.

**Deputy J.A. Martin:**

Yes.

**Mr. P. Bradbury:**

Part 2 will also deal with the increase to 10 years which is part of the migration policy and is still planned.

**Deputy J.A. Martin:**

It will still be an issue, it still ...

**Mr. P. Bradbury:**

And will be.

**Deputy J.A. Martin:**

Right, okay.

**Deputy I.J. Gorst:**

I think politically we felt it was -- these are important big issues and therefore it was important not to just try and lump everything together and be confusing and therefore we have said it is coming.

**Deputy J.A. Martin:**

So I mean they are all in ...

**Deputy I.J. Gorst:**

Oh, they are, yes, it is sort of an ...

**Deputy J.A. Martin:**

They are in our paperwork, yes.

**Deputy I.J. Gorst:**

It is sort of an update to let people know where we are, that it is still coming so that people can make informed decisions about each piece of the policy as it comes forward.

**Deputy P.J.D. Ryan:**

For the last 10 minutes, I would like to concentrate and focus, if we can, on the security of the information that will be held in the index.

**Deputy C.H. Egré**

No CDs.

**Deputy P.J.D. Ryan:**

First of all, which departments will members of the public be able to use to register updated details such as changes of address? Where will the member of the public go to do that?

**Deputy I.J. Gorst:**

I think maybe we touched on this earlier. It is currently proposed that it will be at either Cyril Le Marquand House, the Customer Service Centre, or at Social Security so that it can be strictly controlled with set procedures and set individuals doing that.

**Deputy C.H. Egré**

Either or.

**Deputy P.J.D. Ryan:**

Will they have to register a change of address, though, with any department that they come into contact with?

**Deputy I.J. Gorst:**

What is proposed is that obviously they might come into contact with the department. They see that their address is different and, after that contact, the department they have come into contact with will contact the central unit to say change of address.

**Deputy P.J.D. Ryan:**

Right.

**Deputy I.J. Gorst:**

That department will then contact the individual to amend it.

**Deputy P.J.D. Ryan:**

Okay, so it will not be necessary ...

**Deputy I.J. Gorst:**

You will not be able to go in --

**Deputy P.J.D. Ryan:**

You will not have a situation where all departments have to ...

**Deputy I.J. Gorst:**

-- where somebody sits at a counter and says: "Oh, Mr. Jones, your note here, I see you have moved to St. Peter. We will change it for you now" because it has got to be -- again to deal with issues of security

and accuracy we are proposing it is ...

**Deputy C.H. Egré**

The question I would ask in covering that is who has access to the main database?

**Deputy G.P. Southern:**

For the names and address index?

**Deputy C.H. Egré**

Yes, the name and address index.

**Deputy P.J.D. Ryan:**

But are you talking about the read only or are you talking about ...

**Deputy C.H. Egré**

Input, the read only is not a problem. It is what is going in.

**Deputy I.J. Gorst:**

It is proposed that the - and this is getting into data - maybe you can deal with this, it is going to be the Chief Minister who will be the data controller.

**Deputy C.H. Egré**

No, no, I'm talking about the physical.

**Deputy I.J. Gorst:**

Yes, okay.

**Deputy C.H. Egré**

Which departments have physical access to the database to change things?

**Mr. M. Heald:**

The initial proposal is that that is between Social Security and the Population Office and then any other access would be by regulation under the law so as and when -- what we would like to see obviously to -- for the purpose of good government, we would like departments over time to be using this but that access would be justified and agreed by the States by regulation.

**Deputy P.J.D. Ryan:**

Yes, I think we are talking about 2 different things



**Deputy C.H. Egré**

Let us talk about security. There are 2 ways of dealing with security. One is the security of the data. In other words, you do not want somebody to be making changes, so the question that I was asking was who has access, who can go in and go diggidy dig into that main database?

**Mr. P. Bradbury:**

Data processors will reside at the same place as the customers can go, Social Security, Cyril Le Marquand. Those data processors, the inputers, will be accountable.

**Deputy C.H. Egré**

With direct access to the main ...

**Mr. P. Bradbury:**

Direct access.

**Mr. N. Wells:**

They will be able to write back changes to the index..

**Deputy C.H. Egré**

Okay, yes, right.

**Deputy P.J.D. Ryan:**

It would not be separate departments that would -- they would be able to access the data to bring it down but only what is there. They would not be able to change it.

**Mr. N. Wells:**

They would be able to send changes through, so that those changes would be ready.

**Deputy P.J.D. Ryan:**

To the central department. So there would be -- all departments would still be in a position where they could record a change of address.

**Mr. N. Wells:**

This is true.

**Deputy P.J.D. Ryan:**

And send it through manually presumably or by some method electronically.

**Mr. N. Wells:**

Captured securely and sent through.

**Deputy J.A. Martin:**

Will it be down to -- you are talking about States departments and changing of address. Would it be down to the Parishes individually to make a regulation if they want to be included on this change of address or have you already thought through that, you know, a Parish change of address in Parish or across Parish? Who will inform them because they are basically outside of the States department as it would stand at the moment, I would have thought.

**Deputy I.J. Gorst:**

Yes, we have had a meeting with the Connétables and I think they are considering. It would seem to me that if they did want to have access to the central index, obviously via regulation going through that process, that it would be sensible for them to do it as the Comité des Connétables, but they are thinking about how they would want to approach that issue.

**Deputy G.P. Southern:**

And what uses they are going to put that data to.

**Deputy I.J. Gorst:**

Absolutely, yes, that is right.

**Deputy P.J.D. Ryan:**

There are 2 linked questions to do with security now. What security procedure will be in place to ensure that the information contained in the register is kept secure from unauthorised access in practice, and what will be the audit trail that will be available generally to show who has accessed the data and when it was accessed?

**Deputy I.J. Gorst:**

There are currently robust procedures in place around security of States data. There is something called the Security Policy Group which is a group of senior officers who are responsible for good governance of government data and those policies and that group will -- it obviously will be rolled out to the index and the register, and currently they benchmark themselves to British Standard and International Standard and U.K. private companies and public bodies. I think you -- did you last do a review in July 2007 where the Standard was considered to be a general good level of information assurance?

**Deputy G.P. Southern:**

So substantially better than the Home Office?

**Deputy J.A. Martin:**

Well, that is my next question. It goes all the way through.

**Deputy I.J. Gorst:**

I will just go on a little bit. Obviously projects or pieces of information are ranked around security issues, and this particular project has been classified as Security B. There is a scale of A to D, A being the highest, and one of the reasons that it has been ranked so highly is just because of the sheer volume of data that is going to be included for the, let us say, circa 90,000 households, and I think that shows the sensitivity and the security issues in data management issues which have been taken.

**Deputy G.P. Southern:**

Only we have not got 90,000 households.

**Deputy I.J. Gorst:**

No, sorry, not households.

**Deputy G.P. Southern:**

Because it is going to be substantially bigger than we ...

**Deputy J.A. Martin:**

That is my question, I mean, what Collin is saying. We start with an administrator. You know, the ordinary clerk working at Social or Cyril, accountable to line manager, then Chief Minister's Department, the officer, and then the Chief Minister who will be data controller, but what does this mean? I mean, if something does happen really bad, who takes responsibility along that line? I mean, you know, it has just happened in the U.K. Let us not say it cannot happen so what is a data controller for a layman?

**Deputy I.J. Gorst:**

Let us take the first one, in the U.K., the civil servant responsible has lost his job. Okay, so that is the process of accountability there. I think the other question that you were asking, Pat, was around audit, and I think that is an important issue as well. Who takes, ultimately, the responsibility? My understanding, having been registered under the data protection law for the election, is that the data controller is the person responsible for ensuring that the data is properly managed and stored and secured, et cetera, et cetera. I do not know whether you were driving at this with the idea of audit, but it is proposed that there will be fairly standard audit traces on when information is created and amended and updated, and an audit trail of which user has done that, when they have done it and obviously all

sorts of reports would be produced around that and the -- it is also proposed that the Data Protection Commissioner will have the ability to come in and audit in depth and the systems around that as well.

**Deputy G.P. Southern:**

Can I come to the question I raised earlier about the "I have lost my card. The card gives access to a job and to where I can live so it is an absolutely vital and valuable piece of card. I have lost it. How do I replace it?" How does anybody know there is not then 2 cards floating around the system?

**Deputy P.J.D. Ryan:**

How does the old one get ...

**Deputy G.P. Southern:**

Because currently you just walk into Social Security and say: "My son has lost his card. Can he have a new one?" "What is his name?" "Yes, okay, it is done."

**Deputy I.J. Gorst:**

Well, we come back to the value placed on the card. Yes, the card has got value in that it is your card, it has got your social security number on and it will have your residential status on it but, again, in all likelihood, the card will only be used for an actual purpose if you also have some form of identification. So if you are renting a house, the landlord will want to know that you are who you say you are and that you have the ability to live in that house, you will show the card. But he would also want to -- if it were you, you would want to check that the person who is holding the card and says: "I am Joe Bloggs", his passport also says Joe Bloggs and it has got the picture on there, so although it has some value, I am not sure it has the value that you are insinuating that ...

**Deputy G.P. Southern:**

Out there in bedsit land, that I represent, he can move every 6 months.

**Deputy I.J. Gorst:**

But having said that, if someone did lose their card, obviously they would need to go again to one of the 2 departments, and validate that they are who they say they are and around the fact that they have lost their card and that they require a new card to be issued.

**Deputy P.J.D. Ryan:**

Then we are back to the between 800 and 8,000 people who may not have ID with a photograph on it.

**Deputy I.J. Gorst:**

Yes, but then we are back to the processes that we currently use with Customs and Immigration, are we

not, as we said earlier.

**Deputy G.P. Southern:**

If you say so.

**Deputy C.H. Egré**

Is there a way - this is a direct question - is there a way of finding out if 2 cards are being used?

**Deputy I.J. Gorst:**

With regard to Social Security?

**Deputy C.H. Egré**

Well, yes, with regard to a loss, so if legitimately someone loses a card, legitimately they go back and produce their documentation and they get another card. Somebody has picked up the one that they lost in the street and feels they cannot give it back to the police, they want to use it. Is there a facility that will flag up the fact there is 2 cards being used?

**Mr. P. Bradbury:**

Assuming that the person who has taken somebody else's card then goes to access work, there is a unique number on that card so we would get that number reported twice so we would pick up that. Likewise, if the landlord was diligent, we would get something reported twice. I mean, there is always the opportunity that that does not happen but you would have to have collusion between the individual landlord and the employer.

**Deputy J.A. Martin:**

How would you know that they are not doing 2 jobs on that one card? I mean, it is just ... and the one card -- the more I think about it, it is fraught with ... the counting the numbers and why we need it. I am here, I want my sister's -- I lose my card, I do not lose it but I go down, I have lost my card, you give me another one. My sister comes over, my best friend. I give her that. She stays at the same address, unqualified, with me. We both do, you know, 16 hours a week. We go back. I mean, it is still fraught with a lot of dangers.

**Mr. P. Bradbury:**

I mean, you overlay ...

**Deputy J.A. Martin:**

If you want to make a system that you can work around, we are not -- to me, we are not making the securest.

**Mr. P. Bradbury:**

Again, if I can just answer the question.

**Deputy J.A. Martin:**

It is against these cards, like I lose my Bankcard now. I phone up, it stops straight away anywhere I go. I mean, is it beyond our technology to have a card that you can make -- it is the same number the next day but if somebody goes to try and use that card and it would be -- you are saying an employer might just take a photocopy. Surely they could have a machine at ... it might take a bit of an investment but it is how far you want to go to make this a good, secure and accurate system. That is instead of a Mickey Mouse system again, and I am sorry to say that but I just see it is fraught with danger as it stands. Sorry to be offensive, Ian.

**Deputy I.J. Gorst:**

No, no, that is all right.

**Deputy P.J.D. Ryan:**

Dead easy to get around if you really wanted to, is I think what the Deputy is saying.

**Deputy J.A. Martin:**

Yes, with our technology now, and I am not a techno person, but I mean it just amazes me what can be done and I just think with a little bit of money and a bit more foresight we could have a lot better secure for everybody.

**Mr. P. Boden:**

There is no technology in the card.

**Deputy G.P. Southern:**

There is no technology in the card?

**Mr. P. Boden:**

There is no technology in the card.

**Deputy G.P. Southern:**

It is repeated throughout the document that this is not an identity card, but I am sorry that in that transaction between an employer and therefore a landlord and the tenant, it is an identity card. It is not an identity card but here is my right to rent this room. Here is my right to work in this job in this card. Now, that is a very valuable piece of card. If you look at, I have got 2 swipes on here, one for Morier

House, one for this place. Now, I mislaid that about 3 months ago. The one for this place was knocked off straight away. I found it again, not functioning, okay, so my replacement worked. It was replaced one for one.

**Deputy J.A. Martin:**

Yes, what I am saying, we are not allowed to have any identification on that because of where we work.

**Deputy G.P. Southern:**

The other one, although I reported I had lost my swipe for Morier House was never taken out of commission. That is back on there, having found it again 3 months later. I mean, simple things like that, replacing one for one, is a vital issue if I come along and say, I have lost something.

**Deputy P.J.D. Ryan:**

I think the question is, are we ...

**Deputy I.J. Gorst:**

Again, we are coming back to political questions, are we not, we discussed earlier about whether it was even acceptable to have some form of stick for people saying when they are leaving. Now we are discussing around the whole issues of would the panel prefer it to be a fully blown identity card. That is not the proposal and what the consultation document is about.

**Deputy G.P. Southern:**

No, the panel is asking the questions that you also should be asking about this, about this overlap - can I just come back to it - overlap between what is a names and address index, absolutely safe and nobody is going to use it. Oh, but people are going to be able to use it because it is so thin, and this grey area into the register which is used for all sorts of things, one of which is a basic transaction between landlord and tenant that says: "Yes, rent me that room, I am okay."

**Deputy P.J.D. Ryan:**

Over to Deputy Gorst to answer that question.

**Deputy I.J. Gorst:**

What was the question?

**Deputy G.P. Southern:**

Well, the question was back to how easy is it to get a new card and the possibility of 2 cards floating around.

**Mr. P. Bradbury:**

Yes, well, I think I said dual numbers being reported. Take when people have different jobs, but if somebody reports their card to be stolen or lost, now that can be flagged on the system.

**Deputy J.A. Martin:**

If stolen or lost, but if I wanted to play with the system, it is still not going to be much harder, is it? I mean to say, 2 cards, 2 people, roughly the same age, a year's difference, living at the same address.

**Mr. P. Bradbury:**

If a card is not reported as lost or stolen, it is quite difficult for us to flag that on our system, yes.

**Deputy J.A. Martin:**

But you are not going to make it too hard for someone to get a second card. If they just come down and say: "I have lost my card", it is so difficult. You get your National Insurance number in the U.K. If you lose that, your identification, it can take you weeks and months and you are straight away on top tax and there is things to -- you know, you do not want to lose that, and your employee is under real obligations as well to make sure you get back your papers when you leave your job. Even there, I know, I mean, they have got massive problems but we are a smaller Island and those problems should be able to be built into it.

**Mr. P. Bradbury:**

I do not want to develop procedures on the hoof but, you know, you can build into systems where repeat cards are issued in terms of picking up those numbers being used twice, so it is possible to put in place those precautions.

**Deputy P.J.D. Ryan:**

Right, thanks. I have got one last one, which I think will be important to the public. Will a member of the public be able to request his or her or his or her child's records so that they can see what is held, and can correct any deficiencies?

**Deputy I.J. Gorst:**

Yes, they will.

**Deputy P.J.D. Ryan:**

Are there any other questions from the panel that we have not covered?

**Deputy G.P. Southern:**

Yes, that is fundamental to take objection -- access to your own to check and the ability to say: "Put it



right.”

**Deputy P.J.D. Ryan:**

Are there any other questions that we have missed or is there any other information that you would like to impart to us on things that we have not asked that you have identified that might be of interest?

**Deputy I.J. Gorst:**

I do not think so, just to say thank you for inviting us and for raising the whole consultation process again.

**Deputy G.P. Southern:**

Can I come in there? I just want to take for a minute the other side of the coin we were looking at, 2 cards knocking around. Somebody knocked off the register after the requisite period as being inactive. You are taking that person’s right to live and right to work away from them and I have got this Kafkaesque nightmare of: “I have been wiped from the register, I am still here. What is happening to me? I cannot prove it.”

**Deputy P.J.D. Ryan:**

What was the question?

**Deputy G.P. Southern:**

It does not matter. Just that it is the other side of 2 cards is no cards. Wiping somebody off, you could remove their identity.

**Mr. N. Wells:**

I did just want to make a technical response to that. It is a purely technical response. They would be wiped from the index, which is the current names and address. Of course, they would not be wiped from the population register. That would still be held in history so that would not, in fact, occur and it has been designed in that way to prevent that.

**Deputy P.J.D. Ryan:**

Okay, that is important.

**Mr. M. Heald:**

I mean, it is a good point. Government does have to interact with people who, as you pointed out before, have left the Island. It is valid to retain that for business purposes because that is needed, tax is a very good example.

**Deputy P.J.D. Ryan:**

All right, well, thank you. We have overrun and I am aware that we have overrun and we have got the Data Protection Commissioner waiting outside, and we should not keep her waiting longer than is strictly necessary. Thank you very much for your time this morning and good day to you.