THE OFFICE OF THE

Data Protection Commissioner

2011 Annual Report

Data Protection

A Quick Guide

What is the Data Protection Law (DPL)?

The Data Protection (Jersey) Law 2005 and Data Protection (Bailiwick of Guernsey) Law 2001 seek to strike a balance between the rights of individuals and the sometimes competing interests of those with legitimate reasons for using personal information.

The two Laws give individuals certain rights regarding information held about them. It places obligations on those who process information (data controllers) while giving rights to those who are the subject of that data (data subjects). Personal information covers both facts and opinions about the individual.

Anyone processing personal information must notify the Data Protection Commissioner's Office that they are doing so, unless their processing is exempt.

The eight principles of good practice

Anyone processing personal information must comply with eight enforceable principles of good information handling practice.

These say that data must be:

1. fairly and lawfully processed;
2. processed for one or more specified and lawful purposes;
3. adequate, relevant and not excessive;
4. accurate and up to date;
5. not kept longer than necessary;
6. processed in accordance with the individual's rights;
7. kept safe and secure;
8. not transferred to countries outside European Economic area unless country has adequate protection for the individual.

Individuals can exercise a number of rights under data protection law.

Rights of access
Allows you to find out what information is held about you;

Rights to prevent processing
Information relating to you that causes substantial unwarranted damage or distress;

Rights to prevent processing for direct marketing
You can ask a data controller not to process information for direct marketing purposes;

Rights in relation to automated decision-taking
You can object to decisions made only by automatic means e.g. there is no human involvement;

Right to seek compensation
You can claim compensation from a data controller for damage or distress caused by any breach of the Law;

Rights to have inaccurate information corrected
You can demand that an organisation corrects or destroys inaccurate information held about you;

Right to complain to the Commissioner
If you believe your information has not been handled in accordance with the Law, you can ask the Commissioner to make an assessment.

What is data protection?

Data protection is the safeguarding of the privacy rights of individuals in relation to the processing of personal information. The Data Protection (Jersey) Law 2005 and the Data Protection (Bailiwick of Guernsey) Law 2001 place responsibilities on those persons processing personal information, and confers rights upon the individuals who are the subject of that information.

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"Privacy is like freedom; the less you have of it, the easier it is to recognise."
Anon

Foreword

This is my seventh report as Data Protection Commissioner for the Bailiwick of Jersey and my first as Data Protection Commissioner for Guernsey. It covers the year 2011. The Laws in both Islands are now fully operational and cover a very wide range of data and processing.

At the end of 2011 I took on the role of Data Protection Commissioner for Guernsey as the Islands continue to work more effectively together. It marks a new chapter for the offices in both Jersey and Guernsey and the staff and I are looking forward to the new challenges ahead.

The small team at the Data Protection Offices continue to respond to complex and diverse enquiries against a backdrop of fast moving technological and social change. Debates around privacy continue to hit the headlines most notably in light of the phone-hacking investigation and ongoing Leverson Enquiry. Time will tell whether we are witnessing a shift in approach to the challenging questions of balancing rights of privacy and freedom of expression. Undoubtedly, we are in the midst of much soul searching over some fundamental questions relating to conduct of certain sections of the press as well as the effect a largely unregulated internet may be having on our society.

Whilst clearly providing the majority of users with a positive experience, there is a darker side to social networking sites that recent media coverage has cast a spotlight on. From cyber-bullying to stalking, we are seeing the pre-internet statutory frameworks struggling to respond to the dramatically changing technological landscape. But respond it must and we are awaiting imminent developments in Europe that seek to move the regulatory framework for data protection into the internet era. Those changes will necessarily affect the Crown Dependencies and we continue to work closely with the Channel Islands Brussels office to ensure we are fully prepared.

As greater numbers of us put more and more of our personal information on-line, so there are increasing discussions around regulation, ownership, retention and security of that data. In Europe, the debate is centring around what is being called 'the right to be forgotten'. How much of what individuals, especially the younger generation, do should follow them into adult life? Certainly at our office we are seeing increasing numbers of young adults affected by their on-line 'baggage', especially when they move into the job-market. Increasingly, individuals are leaving behind a trail of information that is forever preserved on the internet, instantly available in a search. A permanent chronicle of their private lives – often of dubious quality or even entirely false – risks following them wherever they go.

"...it is far easier to defend privacy while you still have it, than to reclaim it once it has been lost." Emma Martins, Data Protection Commissioner

While there are many who feel that they have nothing to hide, it is far easier to defend privacy while you still have it, than to reclaim it once it has been lost. Too often, debates around privacy focus on the 'celebrity culture' where individuals actively seek out media attention. This risks significantly underestimating the impact privacy issues can have on the average citizen. It is interesting to note that public opinion seemed to tip when the exposed privacy intrusions in the phone hacking case affected the family of a young murder victim in the UK.

The message remains one of caution. Personal data is extremely valuable and should be treated as such. It is more important than ever for citizens to make sure they deal with reputable organisations, use privacy settings and only make financial transactions on secure sites. There is a lot that individuals can do to protect themselves but the law has to play its part too. Data Protection legislation ensures organisations that handle data do so in a fair transparent and secure manner. This is vitally important for the citizens of Jersey and Guernsey and also plays a large part in contributing to overall trust and confidence for the Islands' economies. In this digital age, geographical boundaries are no constraint for companies working in a global marketplace. The Channel Islands are recognised as well regulated and reputable jurisdictions, which is fundamental in assisting growth and competitiveness of our economy.

I believe we are at the juncture of significant social and cultural change in respect of privacy. Technology is forcing the debate to happen and we need to engage with both sides of the argument. Too many legal restrictions will chill speech and stifle freedom on the internet. On the other hand, if the law is held at bay, there will be little to prevent people from injuring others. The right to the protection of personal data is not an absolute right. It must be considered in relation to its function in society and be balanced with other rights. Privacy remains, however, a fundamental right and its value for us as individuals, as a society and as a globalised world should not be underestimated.

"A man without privacy is a man without dignity; the fear that Big Brother is watching and listening threatens the freedom of the individual no less than the prison bars" Professor Zelman Cowen

Part 1 – Activities in 2011

Introduction

The Data Protection Laws in Jersey and Guernsey create a framework for the handling of personal information across all areas of society. But what is personal data? It is information about us as individual people, which can sometimes be of a sensitive nature. The real issue is how this information about us is handled by the people to whom we entrust it.

Organisations across the Island are tasked with protecting the information they hold about individuals and are legally obliged to apply certain standards which enable them to handle that information in the correct manner. Those organisations which choose to act outside that framework do so at the risk of legal action being taken against them by the individual affected, as well as the possibility of enforcement action by the Commissioner or the Courts.

The Jersey and Guernsey Laws provide a legal basis upon which the Commissioner can exercise her powers of enforcement. As with previous years, the Commissioner was called upon more regularly to exercise those enforcement powers, however it is pleasing that the percentage of cases requiring formal enforcement action is still very low.

Unsurprisingly, the Commissioner's Office in both Islands experienced another significant rise in the number of complaints received. This can be largely attributed to the work of the office in education and improving awareness of information rights, as well as increased confidence of individuals in asserting those rights.

By far the most significant event of the year however was the appointment of a joint Data Protection Commissioner for Jersey and Guernsey. Emma Martins, already on her second term as Commissioner for Jersey was the natural successor to the retiring Dr Peter Harris in Guernsey. The move comes as the Islands' respective Governments seek more opportunities to work together in greater harmony, thus reducing unnecessary spending and increasing the effectiveness of regulatory bodies. The creation of the joint Channel Island's Competition Regulatory Authorities has set the standard moving forward and whilst the Data Protection Offices in Jersey and Guernsey remain as two separate legal entities, there is now scope for greater harmonisation between the two Islands in respect of Data Protection regulation and oversight.

Behind the scenes, much work has been undertaken to establish new working processes for both offices, both in terms of technology and operational practices, and this work will continue into 2012 and beyond.

This report is the first detailing the activities of both Offices for the year 2011.

Promoting Public Awareness

Of the many functions the Offices undertake on a daily basis, promoting the general awareness of data protection both to the public and to organisations, forms the largest and arguably one of the most important aspects of our work.

During 2011, the Offices continued to respond to a large volume of general enquiries via telephone, e-mail and post from the business sector and individuals alike. The nature of the calls varied considerably, but included enquiries such as:

- How to make, and how to deal with a subject access request;
- Sharing data between public sector organisations;
- Human resources issues, including the provision of employment references and data retention;
- Issues arising about social networking sites and internet blogs;
- The inclusion of fair processing statements on data collection forms;
- Notification queries;
- Internet security and safety, particularly in respect of protecting children's privacy;
- The impact of emerging technologies on data processing, such as cloud computing;

- Publication of photographs and personal information on the internet;
- Children's privacy.

The above list is not exhaustive and is merely an indication of the variation in the enquiries received.

As with 2010, some of the queries, such as those in relation to notification and internet issues, have prompted the review of existing guidance or the development of new guidance and good practice notes. These are ongoing and completed guidance is made available on the Commissioner's websites.

Once again, Data Protection Day was celebrated on 28th January 2011, with a number of local initiatives arranged to highlight topical areas of data protection.

"The link between democracy and privacy is not at all accidental. Without a private zone, public life is impossible."

Charles J Sykes

Customer Service and Advice Given

The Office of the Data Protection Commissioner is a public office serving the Islands' communities. It is therefore vital that it maintains a high standard of customer service and is in a position to provide the best service possible to the general public.

To many, the 'front face' of the Office is through the Commissioner's websites (www.dataprotection.gov.je and www.gov.gg/dataprotection) which detail all the latest information and guidance published. The websites are an important communication and information tool which are reviewed on a regular basis to ensure that the public has access to accurate and up to date information. The Jersey website was visited a total of 12,998 times during 2011, averaging 35 visits per day, a slight increase in the number for 2011. 37% of those visits were direct, whereas 42% were referrals through the Google search engine.

Another valuable method of increasing awareness of data protection has been through presentations given by the Commissioner and her Deputy. The Office receives many requests for speaking engagements however it would be impossible to accept all invitations due to the other commitments and activities of the staff involved. That said, the Commissioner and her Deputy delivered a total of 61 presentations across the two Islands to a wide variety of organisations during 2011, with the subject matter ranging from a general overview of the Law and Principles to more focused topics such as data security and internet data processing issues. Further details of the presentations are provided in Appendix 1.

Complaints and Investigations undertaken

Complaints received by the Commissioner are extremely varied in their nature and the Commissioner can exercise a number of powers including the issuing of an Information Notice, Special Information Notice, Enforcement Notice, or an Undertaking as well as seeking a criminal prosecution.

The vast majority of complaints are resolved before the need to invoke any enforcement measures such as those described. However, work on a number of significant investigations undertaken during the previous years with regard to allegations of criminal offences under the Law continued into 2011.

In a significant number of cases investigated during 2011, complaints found to be substantiated were resolved by the respective data controller updating and improving their policies and procedures, or improving the controls over their data handling.

In Jersey, 2011 saw a 16% increase in the number of complaints received on the previous year. 41% of these were in relation to allegation of unfair or unlawful processing. Again, 37% of complaints received were against the retail sector, and 18% were against public sector organisations.

Guernsey saw a slight decrease in complaints of 3% on 2010.

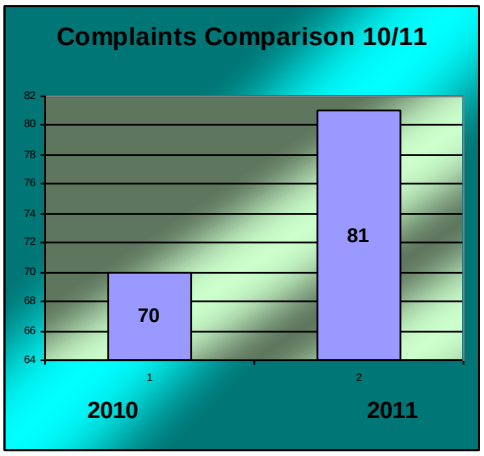
One enforcement notice and one information notice were served on Jersey data controllers during 2011. No undertakings were served.

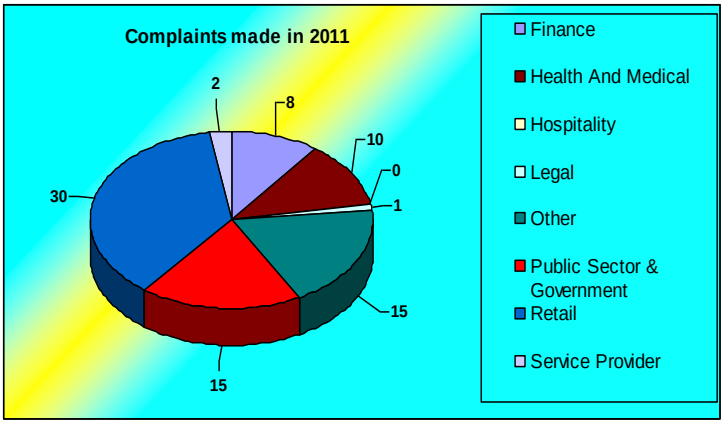
"Processes of control, regulation and surveillance are further intensified by the rapid speed of new technologies."
Paul Lewis

Complaints in Jersey

Our experiences show that in the main, data controllers are extremely co-operative and willing to assist where individuals have made complaints about the way in which their personal information has been handled.

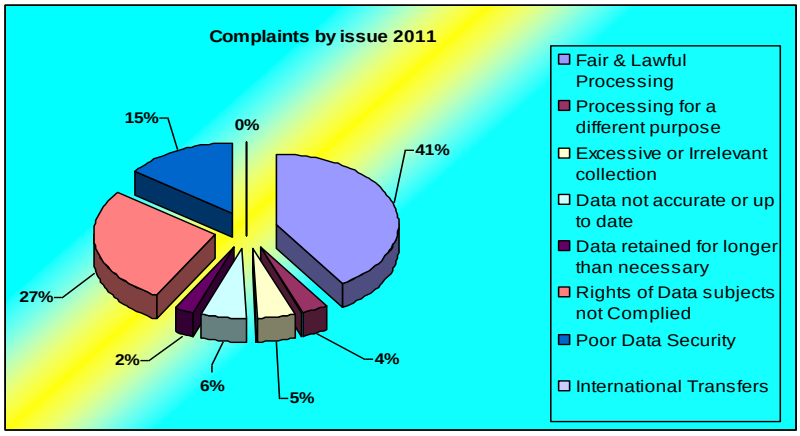
There was a total of 81 complaints, the highest number recorded since records began in 1987. The total also represents an increase of 16% from 2010. This is more likely due to the increased public awareness of information rights.



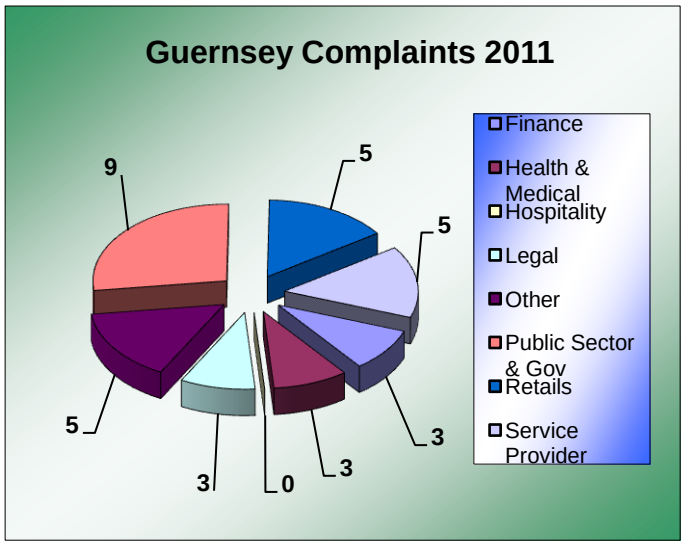


The majority of complaints received were in relation to alleged breaches by retailers. As for 2010, a number of complaints were against online retailers in particular, and continuing efforts are being made with these companies to improve 'unsubscribe' processes in respect of unsolicited marketing emails.

2011 again saw a rise of 5% in complaints relating to allegations of unfair processing, but a 9% drop in complaints where individuals' rights under the Law had not been complied with. This would indicate that data controllers are more aware of how to deal with the information rights of their customers. Complaints relating to poor data security remained the same as for 2010.



"The value of formulating, adapting and demonstrating exemplary e-privacy practices lies in the rewards it yields."
Privacy Commissioner for Hong Kong



Complaints in Guernsey

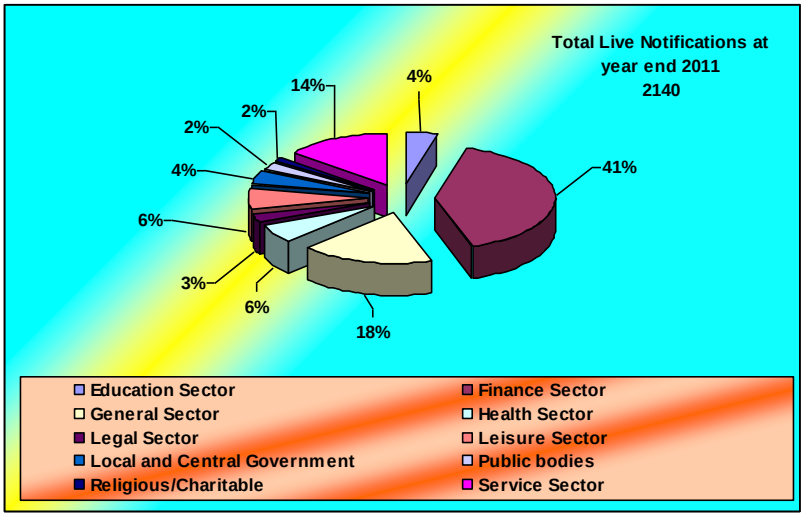
There were a total of 33 complaints during 2011, which represents a slight decrease from 2010. As the chart below indicates, 9 of these complaints were directed against public sector departments, whilst the remaining 24 related to private sector complaints. As with Jersey, the number complaints against the retail industry appears to be rising on previous years. This may be attributed to the greater awareness of data protection rights available to the general public.

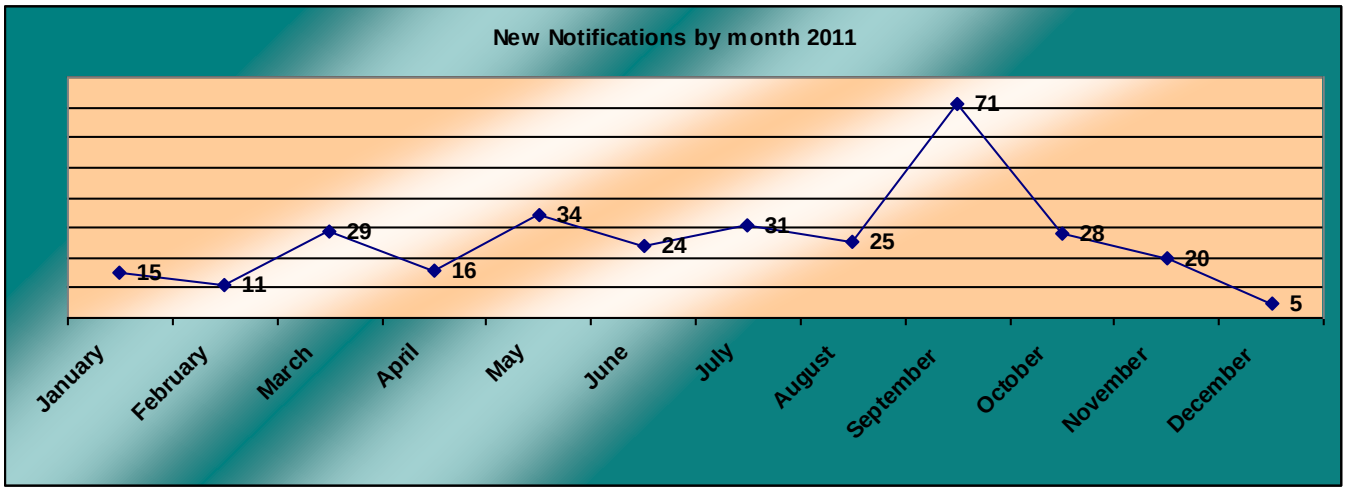
The Public Register (Jersey)

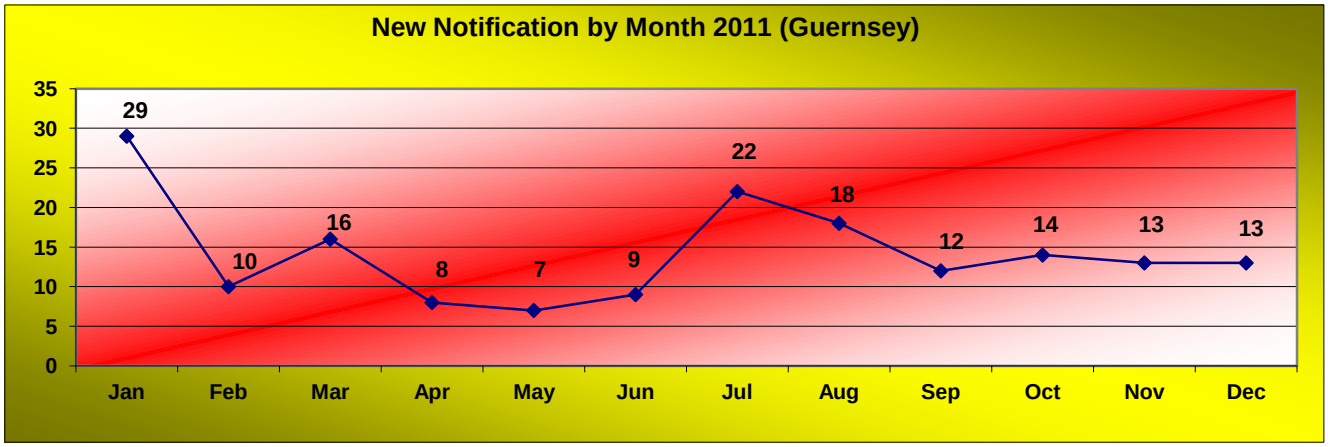
2011 saw the broad spread of notifications remain much the same as it had been for the previous two years, with only a slight rise shown for the finance sector.

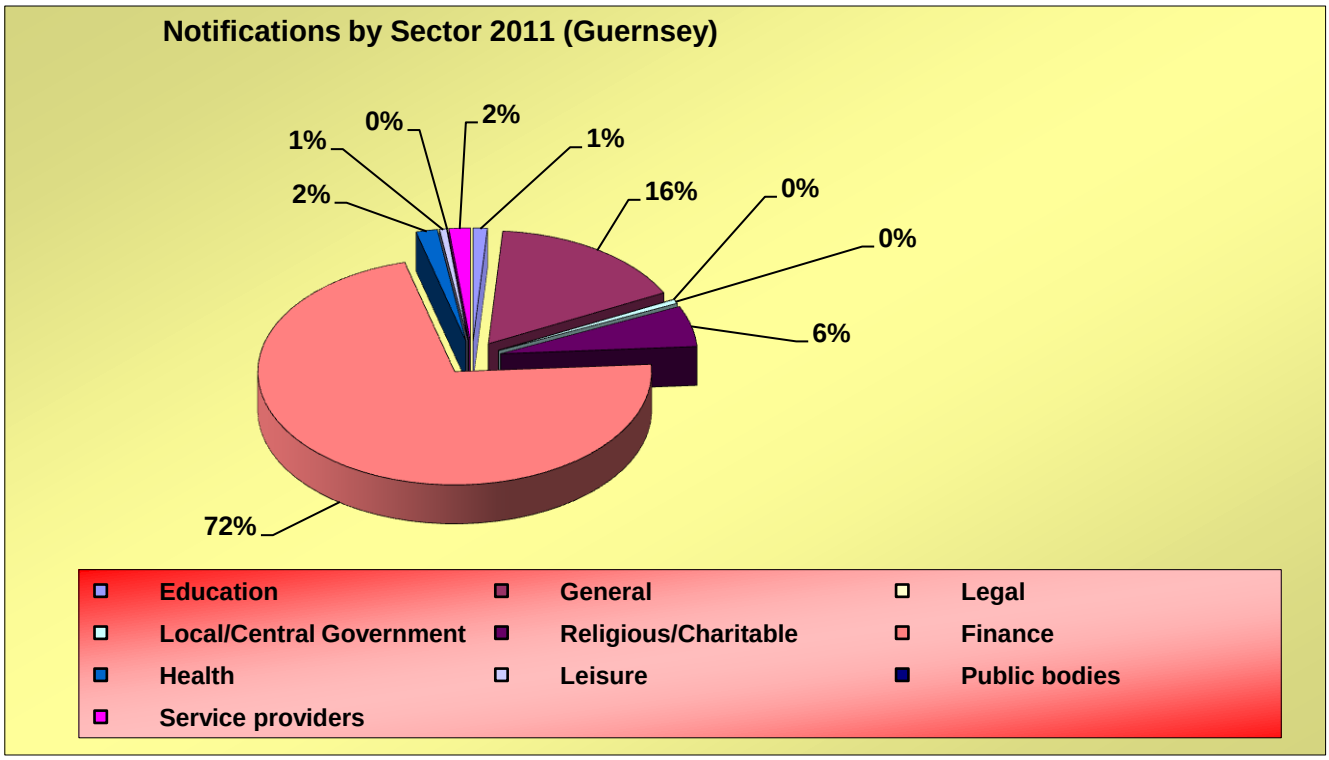
The number of new notifications totalled 310 over the year, an increase of 48 from 2010, bringing the total figure to 2140. The new notifications received during 2010 were spread fairly well across the whole year, whereas in 2011 there was a significant spike in September, with 71 new notifications received.

It is conceivable that the project carried out during 2009 and 2010 assisted in generating this increase, however it is also likely that the increase in the profile of data protection through the media and similar publicity combined with our routine pro-activity on notification compliance has also played a part.




New Notifications by month 2011
15
11
29
16
34
24
31
25
71
28
20
5
January
February
March
April
May
June
July
August
September
October
November
December


New Notification by Month 2011 (Guernsey)
35
30
25
20
15
10
5
0
29
10
16
8
7
9
22
18
12
14
13
13
Jan
Feb
Mar
Apr
May
Jun
Jul
Aug
Sep
Oct
Nov
Dec


Notifications by Sector 2011 (Guernsey)
1%
0%
2%
1%
2%
16%
0%
0%
6%
72%
Education
General
Legal
Local/Central Government
Religious/Charitable
Finance
Health
Leisure
Public bodies
Service providers

The Public Register (Guernsey)

A total of 171 new notifications were received by the Guernsey Data Protection Office. The majority of these were for the finance sector which continues to remain strong in Guernsey, despite the economic downturn.

The Commissioner also received an increased number of voluntary notifications from charities and religious organisations.

The Media

Data protection all too often hits the headlines for the wrong reasons. It is true to say that in the main, such coverage is as a result of either a misinterpretation of the Law or a lack of awareness or appreciation of surrounding issues.

The Channel Islands are no different in this respect, however we are fortunate in such small jurisdictions that misleading or mis-informed articles are few and far between.

The vast majority of local press coverage reflects the work of the Commissioner and the requirements of the Law in a fair and positive light and in such a way that it further enhances the public awareness of data protection requirements and current issues.

During 2011, data protection was the subject of coverage in the local media on many occasions, mostly surrounding the concluding weeks of the first conviction for data protection offences in the Jersey Courts, and the subsequent appeal processes.

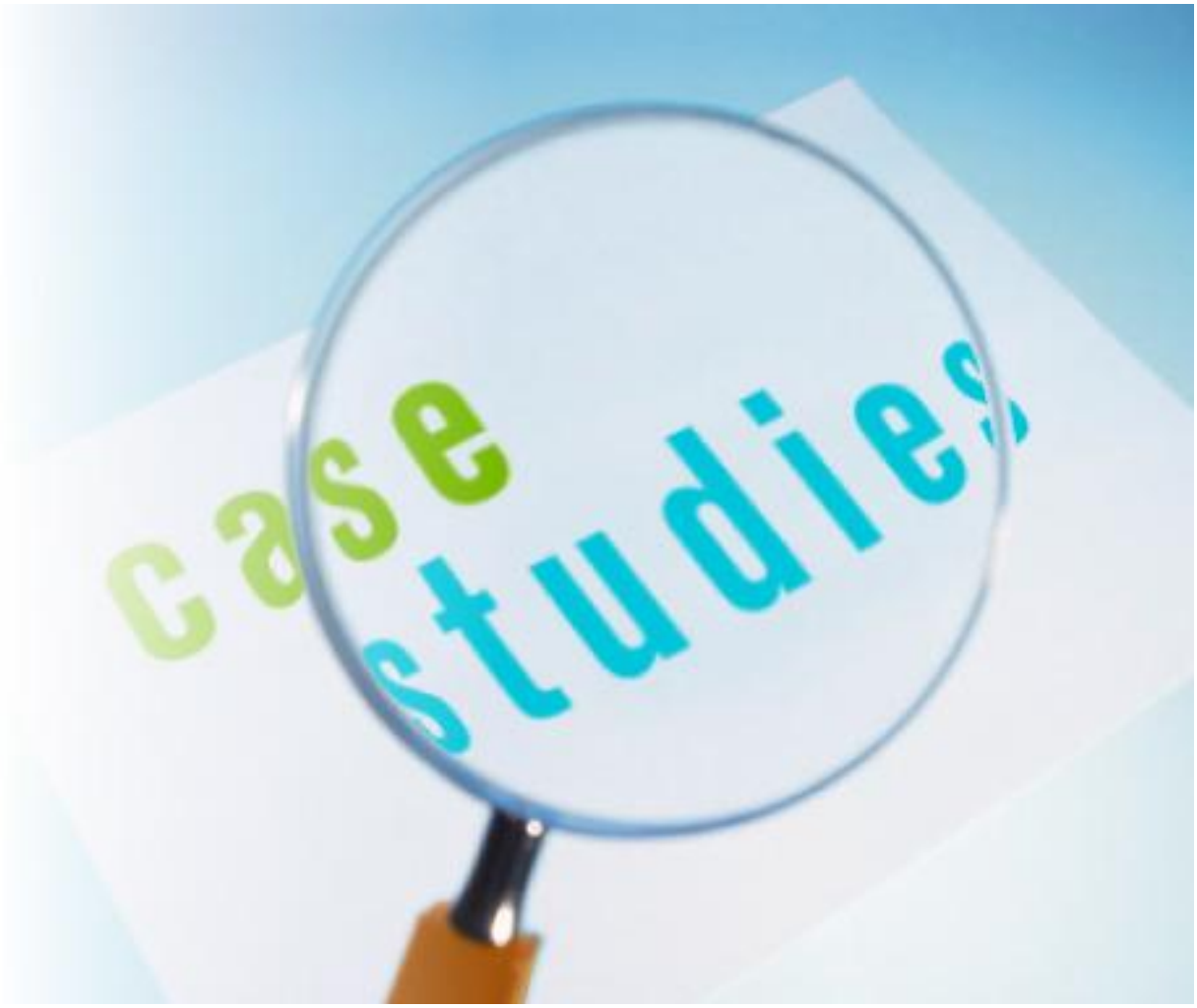
International Activities

2011 saw a reduction in international travel, with no European Data Protection Conference taking place.

With the Jersey Commissioner assuming responsibility for both Islands later in the year, further cost savings were made with only one representative from the two Islands attending the International Conference in Mexico City.

Mexico City Cathedral

"Privacy-related problems are as much political and public policy issues as they are legal and technological ones."
Raab & Bennett


case
studies

Case Study:
Home use of CCTV equipment

1

A man installed CCTV cameras outside his house after youths had caused damage to his car and his garden. Some of the neighbours complained that the cameras appeared to be pointing towards a communal children's play area, causing domestic issues between the man and other residents.

Investigation of the cameras established that cameras had been installed and the images were being recorded on a 'motion-sensitive' basis. However, the cameras were directed only at the man's property and did not cover any areas outside his own boundaries.
Individuals are able to utilise such technology for their own domestic purposes, provided the use of such equipment is restricted to their own property and the scope of coverage of the cameras does not extend beyond their own property boundaries. This will ensure any capture of images is done so in a manner compliant with the 1st Principle.

A Code of Practice and Guidance has been published by the Data Protection Commissioner to ensure data controllers, whether individuals or companies, wishing to use CCTV equipment do so in an appropriate manner which is fair, transparent and lawful.
This can include signage, retention policies for recorded images and restrictions on access to images.
The Code of Practice also give advice as to the covert use of surveillance equipment where specific criminal activity is suspected

Case Study:
Poor data security: 1

2

A large hotel was having a tidy up of their offices and decided to dispose of a lot of historic paperwork that they no longer needed. Amongst the paperwork was a large number of hotel guest registration cards. These were thrown in a skip which sat on the street outside the back of the hotel.

The weather conditions at the time were poor and the strong winds caused many of the cards to be blown across the street. Clearly, all of the cards contained a lot of personal information including the name, address, date of birth of the guest, plus in many cases their passport number.
The 7th Data Protection Principle requires that a data controller takes appropriate technical and organisational measures to protect personal information from, amongst other things, accidental loss.

These measures will apply to all aspects of processing, including the disposal of the information. Given the large quantity of personal information being disposed of, it is unlikely that the methods of disposal used by the hotel in this instance will be complaint with the requirements of the 7th Data Protection Principle.
It is clear in this case that no regard was given to the public location of the skip, the weather conditions, and most importantly, the information contained on each of the record cards.

Case Study:

Obtaining information unlawfully

A telephone company employee was approached by a private investigation firm and offered cash to give them copies of billing information about individuals they were investigating.

This is sometimes referred to as 'blagging' and is a criminal offence under Article 55 of the Data Protection Law. The data controller in this case is the telephone company and they had not provided consent for the information to be passed to the Private Investigators.
Organisations can protect themselves to a large extent with robust policies and procedures which explicitly ensure staff members maintain confidentiality and do not pass the information to any third parties.

In this case, both the employee of the telephone company and the Private Investigators themselves could be subject of criminal sanctions through the Courts if found guilty. The maximum penalty for this offence in Jersey is currently an unlimited fine. The employee could also face disciplinary action from their employer which could likely result in dismissal for breaching client confidentiality and the company's data security policies.

Case Study:

Poor data security: 2

A company was disposing of some old computer and telephone equipment. Amongst the items were a number of old fax machines. All the equipment was passed to another company who offered a recycling service for old communications equipment.

During the dismantling of the equipment, a diligent manager became aware of one employee who was removing the ribbon from a fax machine and was starting to examine it. The manager confiscated the ribbon and examined it himself to discover that it was possible to read what was on it. This particular ribbon contained highly confidential information. Steps have now been put in place to ensure all ribbons are removed from similar machines before the recycling process begins.

This incident highlights the importance of checking all electronic communications equipment to ensure they are cleared of all information before being passed to someone else for disposal or recycling. In the case of computers, that may mean destruction of the hard drive. The organisation disposing of the equipment has an obligation to ensure that any personal data contained on it is securely disposed of. Failure to take sufficient steps to destroy the data before disposal may render the data controller liable to regulatory action for a breach of the 7th Data Protection Principle.

Part 3 – Guidance

Guidance

Guidance notes

One of the important functions of the Commissioner is to produce guidance for the general public and business community as to how the Law and Principles should be applied. This is often achieved by way of Guidance Notes published on the Commissioner's website.

The vast majority of the Commissioner's guidance was published upon implementation of the 2005 Law in December 2005. Since then, a number of further documents have been added to the already comprehensive list of guidance.

2011 saw the implementation of guidance in respect of the notification of security breaches to the Data Protection Commissioner and guidance on security breach management.

One of the main issues highlighted in 2010 was the use of email for marketing purposes. As a direct result, guidance was also published in this area for data controllers who wish to use email as a media for marketing their customers.

Codes of Practice and guidance on the processing of personal data for credit purposes were also drafted and consulted upon during the course of 2010 and published in the early part of 2011. These Codes will be supplemented by a general overarching Code of Practice for Debt Collection and Credit Reference Agencies in 2012, published by the Trading Standards Department and Jersey Consumer Council.

The lack of any Consumer Credit legislation in Jersey has resulted in a largely unregulated credit reference and debt collection industry. Whereas in the UK, the Consumer Credit Act regulates such industry and provides consistency of operation between Credit Agencies, no such framework exists in Jersey. Over time, this has lead to a number of inconsistencies in the operations of Credit and Debt Collection Agencies locally, and the need for a more consistent approach was identified. The Commissioner very much welcomes this further protection for Island residents.

Appendices

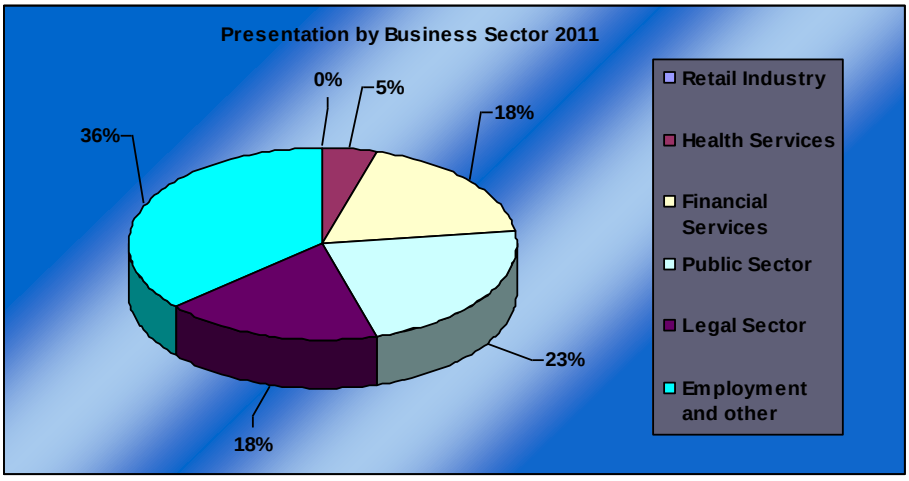
Appendix 1

Presentations

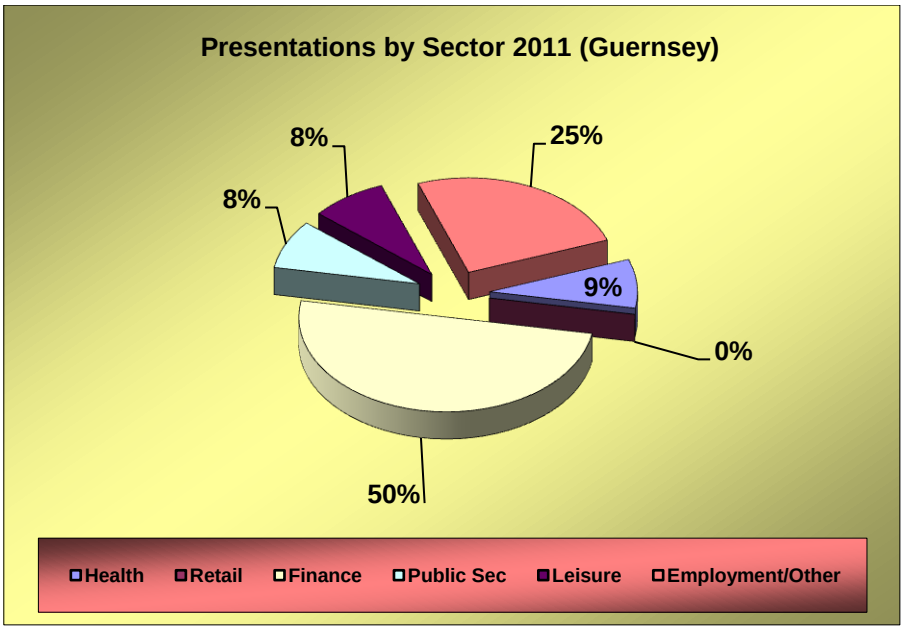
During 2011, a total of 22 presentations were delivered to both public and private sector organisations. The subject matter varied depending upon the needs of the particular organisation, and as well as general overview presentations, the Commissioner and Deputy Commissioner also delivered more focused presentations on subjects such as human resources, e-mail and health issues.

The illustration below shows the split of presentations across the varying business sectors and public bodies.

Presentations (Jersey)



Presentations (Guernsey)



Appendix 2

Financial Statements (Jersey)

Income and Expenditure Account for the year ended 31 December 2011

	Note	£	2011 £	£	2010 £
Income:					
Registry fees			107,700		100,752
Total income			107,700		100,752
Contribution from the States of Jersey			222,400		227,890
Net income			330,100		328,642
Operating expenses:					
Manpower costs:					
Staff salaries, social security and pension contributions	1	296,389		226,934	
Supplies and services:					
Computer system and software costs	2	7,126		3,295	
Pay Offshore admin fees		499		522	
Administrative costs:					
Printing and stationery		1,198		2,782	
Books and publications		2,580		2,500	
Telephone charges	3	384		1,171	
Postage		311		501	
Advertising and publicity		135		408	
Meals and Entertainment		306		31	
Conference and course fees	4	7,573		10,604	
Bank charges		0		0	
Other administrative costs		2,298		5,369	
Premises and maintenance:					
Utilities (incl. Electricity and water)		8,471		9,408	
Rent	5	27,749		28,400	
Total operating expenses			355,019		291,925
Excess of income over expenditure			-24,919		36,717

Statement of recognised gains and losses
There were no recognised gains or losses other than those detailed above.

The notes on the following page form an integral part of this income and expenditure account.

Financial Statements (continued)

Notes to the Financial Statements

1) Manpower costs

During 2011, one member of staff took voluntary redundancy as part of the re-structure of the Jersey and Guernsey Data Protection Offices. A one-off redundancy payment was therefore paid out to this staff member upon their leaving their employment in September 2011.

2) Computer systems and software

This figure has increased significantly since 2010 and is largely due to the replacement of old computer equipment and photocopier.

3) Telephone charges

Telephone charges dropped significantly due to a change in the rental structure for all departments in Morier House.

4) Conference and Course Fees

The Commissioner and her Deputy did not attend either a European or International Conference of Data Protection and Privacy Commissioners in 2011, thus significantly reducing expenditure on travel.

5) Rent

This figure includes a refund of £1,361 following a re-evaluation of floor space used by the office.

Financial Statements (Guernsey)

	Note	£	2011 £	£	2010 £
Income:					
Registry fees			84,699		75,658
Total income			84,699		75,658
Contribution from the States of Guernsey			235,000		231,200
Net income			319,699		306,858
Operating expenses:					
Manpower costs:					
Staff salaries, social security and pension contributions	1	154,177		166,355	
Supplies and services:					
Computer system and software costs		8,111		12,122	
Furniture and office equipment		94		156	
Administrative costs:					
Post and stationery		2,229		2,262	
Printing and publications		1,765		2,346	
Telephone charges		1,626		1,330	
Advertising and publicity		690		690	
Meals and Entertainment		0		0	
Conference and course fees		11,230		9,119	
Other administrative costs		0		0	
Premises and maintenance:					
Utilities (incl. Electricity and water)		6,325		7,232	
Rent		16,918		16,460	
Total operating expenses			203,165		218,072
Excess of income over expenditure	2		116,534		88,786

Statement of recognised gains and losses
There were no recognised gains or losses other than those detailed above.

The notes on the following page form an integral part of this income and expenditure account.

Financial Statements (continued)

Notes to the Financial Statements

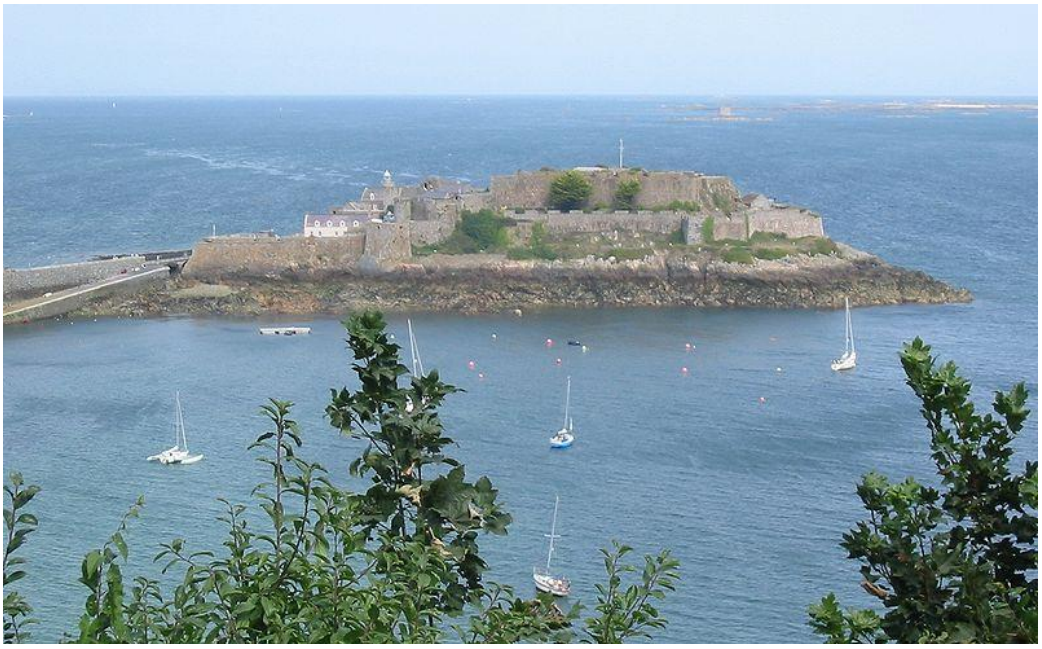
1) Manpower costs

The figure is lower for 2011 than 2010 due to the retirement of the Commissioner at the end of September 2011.

2) Excess income over expenditure

The disparity between the accounts of the two Islands are largely as a result of differing accountancy practices, but are also due to the higher operating costs of the Jersey office.

Elizabeth Marina and Elizabeth Castle, Jersey



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