

**REPLY BY THE PRESIDENT OF
THE COMMITTEE FOR HOME AFFAIRS
TO QUESTIONS ASKED PURSUANT TO RULE 14 OF THE
RULES OF PROCEDURE BY DEPUTY L MCKENNA**

"In the course of a Subject Access Request made by Deputy Curgenvin under the Data Protection (Bailiwick of Guernsey) Law 2017, the Committee for Home Affairs disclosed a redacted documentation containing detailed transcribed logs of the Deputy's social media activity, including posts, comments, "likes," and emoji reactions (for example, "RC acknowledged with a sad face emoji"). The records appear to include reference to other named or initialed members of the public.

In public correspondence on or about 10 and 11 May 2026, the President of the Committee for Home Affairs stated first that "Home staff collected it all from each area and put it together into a document," and subsequently that "the screenshots were sent into the office and not taken by SoG staff." He has also stated that "no SoG committee has been monitoring anyone."

- 1. Has the Committee, whether directly, or indirectly (including through the Law Officers of the Crown), at any time engaged any third party to collect, collate, monitor or otherwise process personal data sourced from social media platforms without the knowledge of the data subject? If so, please confirm the identity of any business or organisation engaged, the dates and duration of engagement, the total cost to public funds, and provide the date this contract was initiated, and under the authority of which Committee?**

No. The Committee has not engaged any third party for such purposes.

- 2. Do civil servants working for, or engaged on behalf of, the Committee routinely process, store or retain on official systems personal data sourced from social media platforms without the knowledge or consent of the subject? If so, does this include information sourced from private groups, and on what lawful bases and for what lawful processing condition(s) under the Data Protection (Bailiwick of Guernsey) Law 2017 is this information processed and what is the applicable retention period?**

No. Civil servants have not been routinely engaged in such activity.

- 3. Deputy Curgenvin recently published what was purported to be social media screenshots from a recent Data Subject Access Request. From what organisation or class of person did the underlying data come into the possession of the Committee; who stored it prior to collation; for what stated purpose was it**

retained; and was it shared with any other person, committee, department or external body?

It would not be appropriate for the Committee to comment further on personal data disclosed through a Subject Access Request process beyond what has already been disclosed in accordance with the statutory process.

- 4. Was the personal data of Deputy Curgenven, in the form of social media activity, at any time presented to, circulated within, seen by, or in any way considered by the Committee for Home Affairs or its sub-bodies? On what occasions did this occur? Who authorised the processing and retention of that data, and on what date?**

No personal data, in the form of social media activity, relating to the Deputy was at any time presented or considered by the Committee. The Committee did view a video posted on social media at the end of last year, where the Deputy expressed his opinion on a matter, which had been reported in the local media, as the subject concerned one of the Committee's services.

- 5. How did the Committee come to hold transcribed, named, dated and compiled the entries within the disclosed file, including such entries as "RC acknowledged with a sad face emoji"? In what role or capacity, on whose authority, and at what cost (including in working hours) was that work carried out?**

Summary information was prepared for the limited purpose of understanding the context of communications received by the Committee and determining whether any clarification, response or further action was required. This work was undertaken reactively and on a proportionate basis in response to matters raised with the Committee and was not part of any ongoing monitoring activity. The work involved approximately four officer hours.

- 6. Can the President explain how two apparently contradictory statements are to be reconciled: that staff "collected it all from each area," and that "the screenshots were sent into the office and not taken by SoG staff"? In respect of the latter, can the President confirm whether the screenshots were solicited or unsolicited, and the class of persons supplying the screenshots?**

The two statements referred to are not contradictory. Material which already existed in different locations had to be collated for the purpose of responding to the Subject Access Request.

As President, I have been open about the fact that I personally took some screenshots relating to matters connected with the Committee's responsibilities, some of which were later forwarded to the Office. Other screenshots were received from members of the public and from other Deputies. This arose in the context of

correspondence and public commentary where questions had been raised as to whether clarification or response might be required.

The material was not gathered as part of any systematic monitoring exercise conducted by the States of Guernsey or by officers.

- 7. Does the Committee *for* Home Affairs, directly or indirectly, routinely receive correspondence from members of the public containing screenshots or records of the social media activity of named individuals? If so, approximately how many such items have been received in the past twelve months; is there a documented process for handling such correspondence; and what is the applicable data retention period?**

No, the Committee does not routinely receive such correspondence. The handling of correspondence depends on the nature and context of the communication received and is managed in accordance with applicable States procedures and legal obligations.

- 8. Are individuals whose social media activity is held in any of the categories above informed that such material is being retained and provided with a notice in accordance with law? If not, why not, and on what statutory exemption is reliance placed? In addition to Deputy Curgenvin, how many other identified or identifiable individuals feature in similar records?**

The Committee complies with its obligations under the Data Protection (Bailiwick of Guernsey) Law 2017, including in relation to subject access requests and applicable exemptions.

- 9. The President has asserted that "no SoG committee has been monitoring anyone". This is an extra-ordinarily broad statement, particularly given that the office of President pertains only to the Committee *for* Home Affairs. Can the President confirm the basis on which he had sufficient information to make such a statement, and whether the statement was drafted by him personally, or by an officer?**

This is not a matter relating to the Committee's mandate insofar as it concerns comments attributed to the President in a personal capacity. Nevertheless, in the interests of openness and transparency, a response has been provided.

It is assumed the quotes referenced originate from social media posts. I maintain that social media is a legitimate and valuable means of communicating with the community. However, elected members should also recognise the influence and responsibility that accompany public commentary made in that forum.

I accept that, taken in isolation, it was not for me to comment on behalf of other Committees. The statement was made in good faith in response to allegations which I considered unsupported and in the same discussion I also stated that I had “seen no evidence” of any States of Guernsey committee monitoring individuals.

10. What is the total cost to public funds, to the best estimate available, of the original processing, transcription and retention of the disclosed material; the response to the Subject Access Request itself; and any third-party engagement?

There has been no third-party engagement, as set out in response to question 1.

It is not possible to estimate with precision the total officer time and associated costs arising during this political term from correspondence, complaints, requests for information, subject access requests and related matters connected with Deputy Curgenvén.

However, the preparation of the Subject Access Request referenced in these questions alone required in excess of 40 officer hours.

This does not reflect any programme of “monitoring” undertaken by the Committee or by officers. Rather, it reflects the administrative and legal obligations arising from sustained correspondence, requests and related engagement requiring formal consideration and statutory compliance.

The Committee and officers are required to comply with statutory obligations in relation to such requests and communications, and those obligations are taken seriously. However, responding to the volume and frequency of such matters inevitably requires the diversion of officer time and public resources away from the Committee’s wider operational, policy and service-delivery responsibilities.

By way of illustration, as at 20 May 2026, the Committee had received 32 separate subject access requests which appeared to arise following a social media post by the Deputy.

There is a statutory process which the Committee respects and complies with, as demonstrated by the disclosure provided in this case, but the process is necessarily resource-intensive.