

# Fair Processing Notice

The Shared Transactional Service Centre ('Shared Services') is a central hub which operates under the Policy and Resources Committee and is comprised of a number of different corporate and public services.

Shared services is managed by the Policy and Resources Committee ('the controller'), the data controller for the processing carried out for the following functions:

1. **Income Management** is responsible for the issuance of invoices and accounts for monies owed to the States of Guernsey, which includes, but is not limited to, Tax on Real Property. The Income Management Team is also responsible for internal banking processes, which includes the processing of States of Guernsey BACS files for salaries, wages and vendor payments and also the collection of customer Direct Debits.
2. **Vendor Payments** is responsible for the payment of vendor invoices and management of vendor accounts across the States of Guernsey.
3. **Business Support** is responsible for the creation of vendor accounts, asset management, the management of the States of Guernsey's insurance policies and compliance procedures.
4. **HSC Income** is responsible for the issuance of Health and Social Care sales orders, the liaison with patients and their private medical insurance companies concerning the chargeable services which they have received as a private or overseas patient. The HSC Income Team also calculates and arranges the payment of allowances for foster carers.

## 1. The Data Protection Law

The controller acknowledges its obligations as per the data protection law, which provides a number of requirements in terms of processing activities involving personal data. The controller further acknowledges the general principles of processing as well as the rights of a data subject and more information in relation to these can be found by visiting [www.gov.gg/DP](http://www.gov.gg/DP).

The controller acknowledges that all processing of personal data must be lawful, fair and undertaken with transparency. The table (Appendix A – please see below) explains all of the processing which is being undertaken within Shared Services for the purposes set out above.

The controller has implemented a strict protocol across Shared Services which ensures personal data is not retained, by any of the teams set out above, past the point in time when the purpose for which the personal data was collected and processed has been

carried out. Where the controller no longer considers there to be a lawful or legitimate basis to retain personal data, this information will be erased or destroyed in a safe and secure manner. If you wish to receive further information regarding how long your personal data will be retained, please contact the controller or their Data Protection Officer using the contact details below.

The controller may share your personal data in the following circumstances:

Identity data may be shared with a third party where –

- It is necessary to perform a contract for a legitimate purpose

Financial data may be shared with a third party where –

- It is necessary to perform a contract, such as to make or receive a payment or arrange a financial transaction
- The third party represents the data subject in respect of a payment or financial transaction

Contact data may be shared with a third party where –

- The data subject has given consent for the contact data to be shared with the third party
- It is necessary for the performance of a contract, where the sharing of contact data is required to –
  - Facilitate the issuance of States of Guernsey invoices
  - Facilitate the collection of monies owed
  - Facilitate the delivery of goods
  - Facilitate the payment of an insurance claim

Health data may be shared with a third party where –

- Consent is provided for the sharing of this data when the data subject provides their insurance details

Where money owed to the States becomes a debt: identity, contact, financial and potentially health data will be shared with the Recoveries Team, located within the Revenue Service, for the purposes of facilitating recovery of said debt. See the Revenue Service privacy notice for further information at [gov.gg/revenue-service](http://gov.gg/revenue-service)

The States of Guernsey have a professional relationship with a third party supplier, Agilisys Guernsey Ltd., who provide support to and carry out maintenance on the IT infrastructure of the organisation. For Agilisys to carry out the function they are contracted to provide, there will be instances where they may have sight of your personal data. Shared Services will only provide Agilisys with access to your personal data where there is a legitimate and lawful purpose for this access to be given in line with Schedule 2 of the Data Protection (Bailiwick of Guernsey) Law, 2017 and our internal policies and directives.

Your personal data will also be shared with the Scrutiny Management Committee ('SMC') and the Internal Audit function of the States of Guernsey, as specifically requested by the relevant controller and only where absolutely necessary for the completion of their relevant functions. Furthermore, any personal data shared with SMC and Internal Audit will be limited and processed in accordance with Conditions 5 and 13(b) of Schedule 2 of the Law.

In order to maximise the efficiency of the services provided across Shared Services, the controller has implemented digital solutions which may process your personal data in an automated manner. Any automated processing undertaken by the controller will not make a decision or carry out any action which will affect you as an individual. Furthermore, the automated processing is limited to processes such as sending automated responses to emails and automatically saving documents you have provided via email into the controller's secure electronic storage.

## 2. Contact Details

The address of Shared Services is:

Sir Charles Frossard House, La Charroterie, St Peter Port, Guernsey, GY1 1FH

The contact details of the controller are as follows:

### The Policy and Resource Committee

Tel: +44 (1481) 227000

Email: [policyandresources@gov.gg](mailto:policyandresources@gov.gg)

### The Income Management Team

Tel: +44 (1481) 223002

Email: [income@gov.gg](mailto:income@gov.gg) or [HUB.income@gov.gg](mailto:HUB.income@gov.gg)

### The Vendor Payments Team

Tel: +44 (1481) 223001

Email: [HUB.payablesinvoicequeries@gov.gg](mailto:HUB.payablesinvoicequeries@gov.gg)

The Business Support Team

Tel: +44 (1481) 223001

Email: [HUB.business@gov.gg](mailto:HUB.business@gov.gg)

The contact details of the Shared Services Data Protection Officer are as follows:

Tel: +44 (1481) 220012

Email: [data.protection@gov.gg](mailto:data.protection@gov.gg)

## Appendix A

Name of function	Personal data	Purpose of processing	Lawful basis for processing
Income Management	<p>Basic personal data</p> <ul style="list-style-type: none"> <li>- Identity data               <ul style="list-style-type: none"> <li>o Full name, maiden name, marital status, title and date of birth.</li> </ul> </li> <li>- Financial data               <ul style="list-style-type: none"> <li>o Bank account data</li> </ul> </li> <li>- Contact data               <ul style="list-style-type: none"> <li>o Current and previous postal address, email address, former addresses and telephone numbers.</li> </ul> </li> </ul> <p>Special category data</p> <ul style="list-style-type: none"> <li>- Health data</li> </ul>	<p>Identity data</p> <ul style="list-style-type: none"> <li>- This personal data is provided by the data subject and processed to ensure that invoices, payment information and other related correspondence is issued to the correct customer.</li> </ul> <p>Financial data</p> <ul style="list-style-type: none"> <li>- This personal data is provided by the data subject and processed to allow the processing of salaries, wages, vendor payments, direct debit payments and customer refunds.</li> </ul> <p>Contact data</p> <ul style="list-style-type: none"> <li>- This personal data is provided by the data subject and processed to ensure that invoices, payment information and other related correspondence is issued to the correct customer at the correct address.</li> </ul> <p>Health data</p> <ul style="list-style-type: none"> <li>- This special category data may be provided directly by the data subject or indirectly via Health &amp; Social Care and is processed for the purpose of liaising with private medical insurers in order for medical fees to be settled directly.</li> </ul>	<p>The processing is necessary for the conclusion or performance of a contract;</p> <p>The processing is necessary for the exercise or performance by a public authority of a function that is of a public nature;</p> <p>The processing is necessary for a health or social care purpose and is undertaken by a person who in the circumstances owes a duty of confidentiality which is equivalent to that which would arise if the person were a health professional.</p>
Vendor Payments	<p>Basic personal data</p> <ul style="list-style-type: none"> <li>- Identity data               <ul style="list-style-type: none"> <li>o Full name, maiden name, marital status, title and vendor account number.</li> </ul> </li> <li>- Financial data</li> </ul>	<p>Identity data</p> <ul style="list-style-type: none"> <li>- This personal data is provided by the data subject and processed to enable invoices, or other requests sent to the States of Guernsey, to be processed.</li> </ul> <p>Financial data</p>	<p>The processing is necessary for the conclusion or performance of a contract.</p>

Name of function	Personal data	Purpose of processing	Lawful basis for processing
	<ul style="list-style-type: none"> <li>○ Bank account data</li> <li>- Contact data               <ul style="list-style-type: none"> <li>○ Current and previous postal address, email address, former postal addresses and telephone numbers.</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>- This personal data is provided by the data subject and processed to enable a payment to be made to the data subject.</li> </ul> <p>Contact data</p> <ul style="list-style-type: none"> <li>- This personal data is provided by the data subject, or their authorised representative, and processed so that identification and validation checks can be completed to ensure that the States of Guernsey and the data subject are protected from fraud. The information will also be used to send payments and/or payment information to the data subject.</li> </ul>	
Business Support	<p>Basic personal data</p> <ul style="list-style-type: none"> <li>- Identity data               <ul style="list-style-type: none"> <li>○ Full name, maiden name, marital status, title, date of birth and vendor account number.</li> </ul> </li> <li>- Financial data               <ul style="list-style-type: none"> <li>○ Bank account data</li> </ul> </li> <li>- Contact data               <ul style="list-style-type: none"> <li>○ Current and previous postal address, email address, former addresses and telephone numbers.</li> </ul> </li> </ul> <p>Special category data</p>	<p>Identity data</p> <ul style="list-style-type: none"> <li>- This personal data is provided by the data subject and processed for the purpose of creating a vendor account and to ensure that the data subject can be paid for goods, services, grants, refunds or court related payments to be made by the States of Guernsey.</li> </ul> <p>Financial data</p> <ul style="list-style-type: none"> <li>- This personal data is provided by the data subject and processed to enable vendor payments to be made by BACS.</li> </ul> <p>Contact data</p> <ul style="list-style-type: none"> <li>- This personal data is provided by the data subject, or their authorised representative, and processed to ensure that compliance and security checks can be undertaken to ensure the personal data provided is bona fide.</li> </ul>	<p>The processing is necessary for the conclusion or performance of a contract;</p> <p>The processing is necessary for the purposes of the legitimate interests of the controller or a third party;</p> <p>The processing is necessary for a health or social care purpose and is undertaken by a person who in the circumstances owes a duty of confidentiality which is equivalent to that which would arise if the person were a health professional;</p>

Name of function	Personal data	Purpose of processing	Lawful basis for processing
	<ul style="list-style-type: none"> <li>- Health data</li> </ul>	<p>Health data</p> <ul style="list-style-type: none"> <li>- This special category data will be provided by the relevant Committee within the States of Guernsey and is processed for the purpose of handling insurance claims made against the States of Guernsey.</li> </ul>	<p>The data subject has given explicit consent to the processing of the personal data for the purpose for which it is processed.</p>
HSC Income	<p>Basic personal data</p> <ul style="list-style-type: none"> <li>- Identity data <ul style="list-style-type: none"> <li>o Full name, maiden name, marital status, title and date of birth.</li> </ul> </li> <li>- Financial data <ul style="list-style-type: none"> <li>o Bank account data</li> </ul> </li> <li>- Contact data <ul style="list-style-type: none"> <li>o Current and previous postal address, email address, former addresses and telephone numbers.</li> </ul> </li> </ul> <p>Special category data</p> <ul style="list-style-type: none"> <li>- Health data</li> </ul>	<p>Identity data</p> <ul style="list-style-type: none"> <li>- This personal data is provided by the data subject and/or Committee <i>for</i> Health and Social Care and processed to ensure that invoices, payment information and other related correspondence is issued to the correct customer, or in the case of foster carers, to ensure that they are able to be paid their fostering allowance.</li> </ul> <p>Financial data</p> <ul style="list-style-type: none"> <li>- This personal data is provided by the data subject and/or Committee <i>for</i> Health and Social Care and processed to enable vendor payments to be made by BACs and for the payment of fostering allowances.</li> </ul> <p>Contact data</p> <ul style="list-style-type: none"> <li>- This personal data is provided by the data subject and/or Committee <i>for</i> Health and Social Care, or their authorised representative, and processed so that compliance and security checks can be undertaken to ensure data provided is bona fide</li> </ul> <p>Health data</p>	<p>The processing is necessary for a health or social care purpose and is undertaken by a person who in the circumstances owes a duty of confidentiality which is equivalent to that which would arise if the person were a health professional.</p>

Name of function	Personal data	Purpose of processing	Lawful basis for processing
		<ul style="list-style-type: none"><li>- This special category data is provided by the data subject and/or Committee <i>for</i> Health and Social Care and is processed for the issuance of an invoice which relates to a private or chargeable treatment given whilst receiving care at the Princess Elizabeth Hospital or other States of Guernsey health facility and any further liaison with the data subject or their private medical insurance company.</li></ul>	