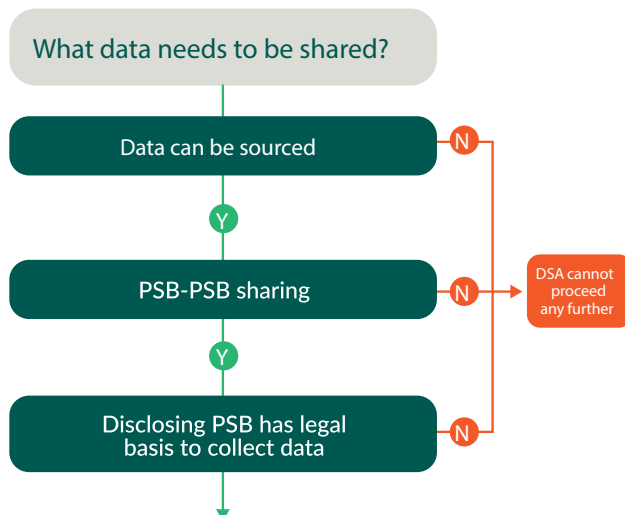


DSGA Data Sharing Playbook



An Roinn Caiteachais
Phoiblí agus Athchóirithe
Department of Public
Expenditure and Reform

STAGE 1: Data Sharing Preparation



USEFUL ACRONYMS

PSB: Public Service Body
DSA: Data Sharing Agreement
DPO: Data Protection Officer
DGU: Data Governance Unit

SUMMARY

Prerequisite 1

To verify the personal data you require exists, check the Public Service Data Catalogue or confirm with the disclosing PSB.

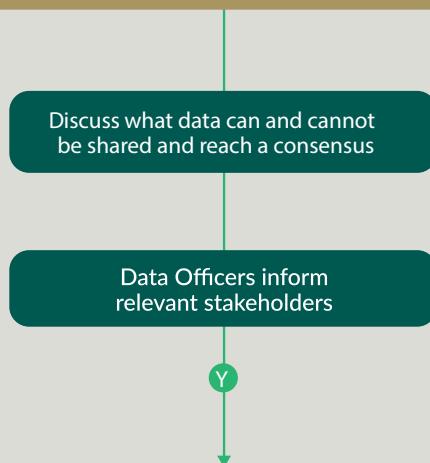
Prerequisite 2

The data must be shared only between Public Bodies as defined in the Act.

Prerequisite 3

There must be a legal basis for the disclosing PSB to collect the personal data.

STAGE 2: Data Officers Review (All PSBs)

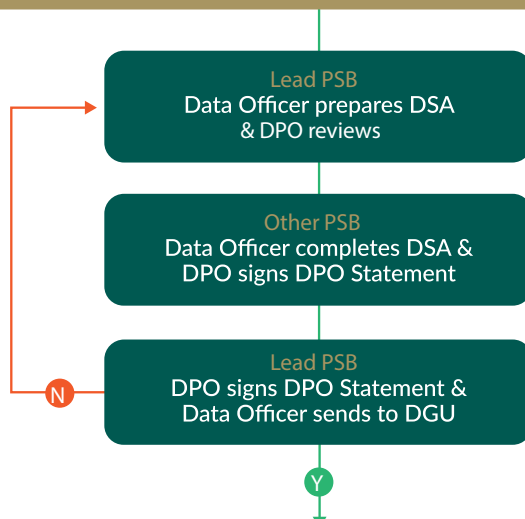


SUMMARY

Communication between the Data Officers' of the PSBs involved is essential. The Data Officers from each PSB should agree that the requested data is data that, in accordance with the Data Sharing and Governance Act (DSGA), can be shared.

Once a consensus has been reached the Data Officers involved inform the relevant stakeholders (authorised signatory and their DPO) about the proposed DSA, who is involved and who will take on the role of Lead PSB. The Lead PSB informs the Board of same, by emailing dgbsecretariat@per.gov.ie along with any special public consultation requirements. See DSGA Data Sharing Guidelines (the Guidelines) for a description template and more information about this stage.

STAGE 3: Preparing the Data Sharing Agreement (Lead PSB)



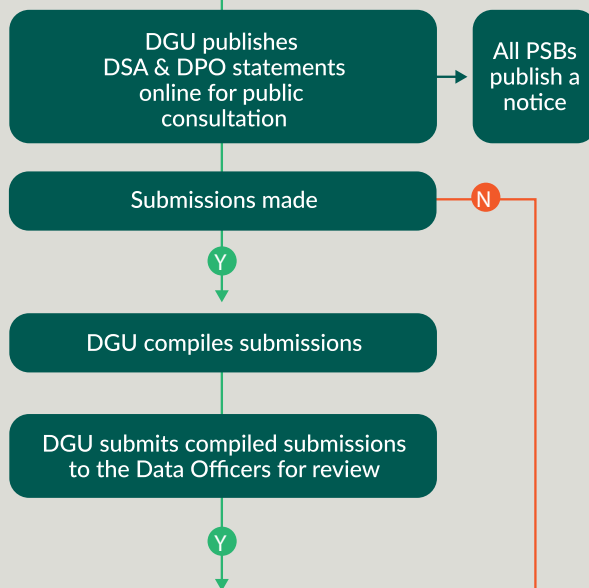
SUMMARY

Consideration should be given if a Data Protection Impact Assessment (DPIA) must be completed to support the DSA. Note that the DPIA may inform several sections of the DSA. Note also that where a DPIA has been carried out a summary must be included as part of the content of the DSA and where no DPIA was carried out, a summary of the reasons why must be included.

A DSA is prepared by the Lead PSB's Data Officer and their DPO reviews it before sending to the Other PSB/PSBs for completion.

All sections of the DSA must be completed. All DPOs are required to sign a DPO statement (included in the DSA), once this is complete the Lead PSB will send a copy of the DSA to the DGU who will manage the public consultation process.
Email: consultations.dsa@per.gov.ie.

STAGE 4: Public Consultation (28 days)



SUMMARY

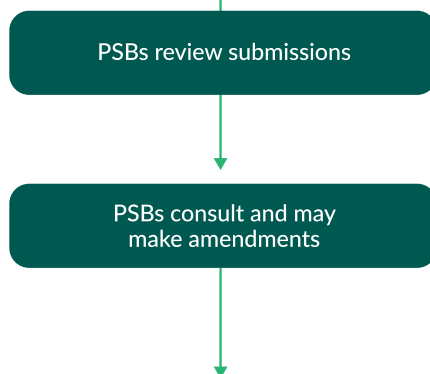
All data sharing agreements (including DPO statements) will be published online <https://www.gov.ie/en/consultations/> and expire after 28 days.

All PSBs must publish, on the same date as the consultation, a notice on their website that they are proposing to enter into the DSA. They should state the documents that are accessible to the public and link to their relevant DSA and DPO statements published on the public consultations website. This notice should invite submissions and include the date of publication of the notice. See the Guidelines for more information and a Notice template. The Lead PSB must also notify the Board about these publications by emailing dgbsecretariat@per.gov.ie.

The DGU will compile all submissions made from the public consultation process and feed them back to the relevant Data Officers from the PSBs involved.

If there are no submissions the DGU will notify the Lead PSB about this and send the DSA to the Board for review.

STAGE 5: PSBs Review (21 days)



SUMMARY

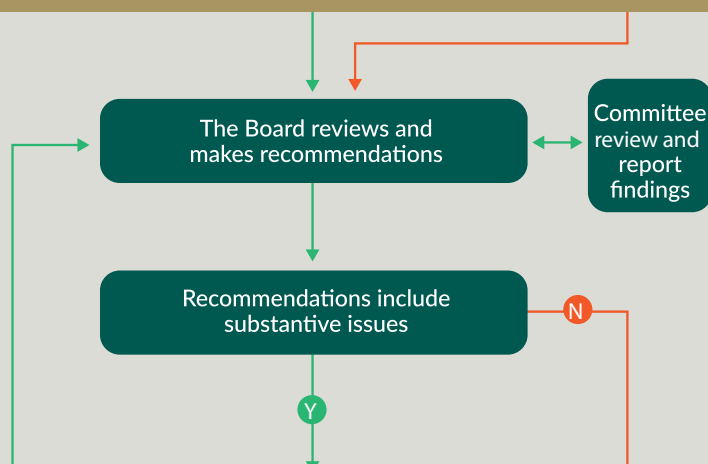
Each PSBs Data Officer will receive the compiled submissions from the DGU for review.

The PSBs involved will consult on the submissions and may make amendments to the DSA. Once complete the Lead PSB will send the DSA to the Board for review.

The Lead PSB has 21 days to submit the following to the Board:

- Copy of the DSA (with amendments, where applicable)
- Relevant DPO statements (included in the DSA)
- DPIA summary, where one has been carried out (included in the DSA)
- Any information that the Board may require regarding submissions made through the public consultation process

STAGE 6: Data Governance Board Review



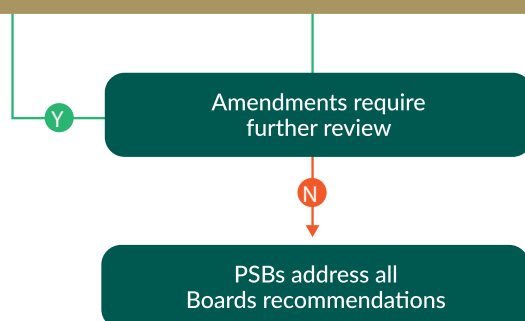
SUMMARY

The Board's review may involve seeking information from the Lead PSB and consulting with relevant Ministers.

The Board will seek appropriate advice from their Data Sharing Committee and may seek further advice from other established Committees. The DS Committee will review the DSA and advise the Board of their findings. Other relevant Committees will advise the Board on any aspect of the DSA as requested.

Once the Board has completed their review and if substantive issues arise in their recommendations, a further review will be requested by the Board. If no further review is required by the Board, they will issue their recommendations to the Lead PSB to be addressed.

STAGE 7: PSBs Address Recommendations & Sign



SUMMARY

PSBs may seek clarification from the Board on their recommendations.

If there are amendments that contain substantive issues the amendments will be made and sent back to the Board for further review.

The PSBs must ensure that all recommendations made by the Board are addressed, only then can the DSA be executed.

PSBs (authorised signatories) sign the DSA and DPO updates statement

Once all recommendations have been addressed the DSA will then be signed by each PSB's authorised signatory and the DPO will update their DPO Statement (signed and dated).

STAGE 8: Publication

Publish

SUMMARY

The Lead PSB's Data Officer will be responsible for sending the final executed DSA to the Minister (DGU) within the specified time (10 days). Email: dgbsecretariat@per.gov.ie. The DGU, on behalf of the Minister, will publish a list of documents the Minister has received.

The Lead PSB will be responsible for publishing the final executed DSA on their website.

The Board will publish the executed DSA and their recommendations on their website.

STAGE 9: DSA Implementation

DSA Implementation

SUMMARY

The Lead PSB's Data Officer will be responsible for informing the Data Governance Board of any changes to the Data Sharing Agreement during the lifetime of the agreement.

See the Guidelines for more detailed information on each stage of the Playbook.

ROLES AND RESPONSIBILITIES:

LEAD PSB:

The decision about who takes on the role of the Lead PSB is detailed in the Guidelines. The Lead PSB is responsible for notifying the Board of any specific public consultation requirements at stage 2 of the playbook. It is the Lead PSB's Data Officer's responsibility to prepare the DSA for submission to the Other PSB's. Once complete they will send the DSA to the DGU for public consultation which must include the relevant DPO statements. The Lead PSB will be required to publish, on the same date as the consultation, a notice on their website that they are proposing to enter into the DSA. They should state the documents that are accessible to the public and link to their relevant DSA and DPO statements published on the public consultations website. This notice should invite submissions and include the date of publication of the notice. Once the DSA has been executed they have 10 days to send to the Minister (DGU) and as soon as is practicable thereafter, publish a copy of the DSA on their website.

OTHER PSB:

The PSB that is the other party/parties to the Data Sharing Agreement is known as the "Other PSB". The Other PSB contributes to the DSA throughout the Playbook process. It is their responsibility to publish, on the same date as the consultation, a notice on their website that they are proposing to enter into the DSA. They should state the documents that are accessible to the public and link to their relevant DSA and DPO statements published on the public consultations website. This notice should invite submissions and include the date of publication of the notice.

DATA OFFICER:

A Data Officer is an official from each PSB that serves as the main contact throughout the playbook process and for the lifetime of the DSA. The Data Officer will communicate with the Other PSBs Data Officers in relation to the DSA, coordinate the DSA locally and advise their relevant stakeholders (authorised signatory and DPO) about the proposed DSA and be responsible for publishing the DSA notice on their website.

DATA GOVERNANCE UNIT (DGU):

The Data Governance Unit in the Office of the Government Chief Information Officer (OGCIO) is the secretariat to the Board and acts as the secretariat to the Minister for their responsibilities in the DSA process. They are responsible for managing the public consultations process.

DATA PROTECTION OFFICER (DPO):

It is the Data Protection Officer's responsibility to review the proposed agreement and sign a statement to that fact at public consultation stage (Stage 4) and execution stage (Stage 7). This statement confirms that they are satisfied that the DSA is compliant with Data Protection law and consistent with the GDPR.

COMMITTEE:

A Committee is set up by the Board to advise them on matters relative to the DSA. The Committee may review the DSA and report their findings back to the Board.

DATA GOVERNANCE BOARD (THE BOARD):

The Board can establish their own Committees to advise them on relative matters to the DSA. The Board reviews all Data Sharing Agreements submitted to them and makes recommendations that will be sent to the Lead PSB and must be addressed. Once the DSA is executed their recommendations will be published online along with a copy of the DSA.

AUTHORISED SIGNATORY:

An Authorised Signatory has the role of accountability for the data sharing agreement and is a senior official within the PSB (Principal Officer/equivalent or above).

Data Sharing and Governance Act:

The Data Sharing and Governance Act 2019 is found here: <http://www.irishstatutebook.ie/eli/2019/act/5/enacted/en/print.html>



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Department of Public
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