An Roinn Forbartha
Tuaithe agus Pobail
Department of Rural and
Community Development

PUBLIC PARTICIPATION NETWORKS

DATABASE ACCESS

15th. April 2019

Circular Letter CVSP 4/2019

To: Each PPN Resource Worker and for onward transmission to Secretariat for information.

A Chara
The purpose of this Circular letter is to clarify the position regarding the use of, and access to, the Salesforce Database i.e. *the Database*. This is considered necessary in the context of both changing personnel at Resource Worker level and the engagement of Support Workers in 2019.

Database
The Database, is a web database management system funded and supported by the Department that provides a means for each PPN Resource Worker and now the Support Worker, to gather and manage a database of member organisations and contacts within the PPN area. It also provides a facility for both to manage a variety of communications processes and events such as email campaigns, newsletters, workshops and training events and to log and track meetings and attendances at meetings. The information gathered provides data for reporting with the best example of this being the data provided for the Annual Reports of 2017 and 2018.

Those who have received formal training on the database provided by South Dublin Volunteer Centre (SDVC) will be familiar with the various features of the database. For those yet to receive that training, mostly the Support Workers, the Department has contracted SDVC to provide specific database training commencing in June of this year. Further details will issue in due course.

Given the changes and additions in personnel using the database, it is considered appropriate to emphasise to all users that the data collected and contained on each PPNs database is sensitive material and is subject to the terms of General Data Protection Regulation (GDPR) which has been in force since May 2018. GDPR very significantly increases the obligations and responsibilities for organisations in how they collect, use and protect data. Obligations of Data Controllers, which in the context of PPNs are effectively the Resource/Support Workers are also very clearly defined by GDPR. Again in the context of PPNs, the responsibilities of Data Processors are set out in clear terms. New members of staff to PPNs should familiarise themselves fully with GDPR and the legal obligations it places on Database Data Controllers and Data Processors.

In brief, Controllers and Processors have an obligation to keep personal data secure. Under GDPR, Controllers and Processors must consider implementing modern security measures appropriate for the risks involved in their activities. For example, risks may come from accidental or unlawful destruction of stored data or unauthorised disclosure, access or alteration.

While it is not the intention of this Circular to repeat what GDPR means for PPNs, having regard to the level of PPN staff movement and the recruitment of new staff, one area of concern for the Department is the issue of **database access**. In this regard, it's appropriate to remind relevant personnel that a Data Controller must be aware of the different users who access their systems/records and their requirements for so doing. Additionally, PPNs should have some basic but specific procedures in place to deal with personnel moving within the PPN and leaving and joining, to either provide/increase access or restrict previous access, detect use of default passwords or access by individuals with or granted access but who have no justifiable reason for such access. Regular reviews of actual access will ensure that all authorised access is strictly necessary and justifiable in the context of the performance of the function of the PPN.

The Salesforce Database itself provides various security features protecting access to the system, access to data modules and even access to individual data fields. Salesforce allows a specific individual to control who can access the system, who can access particular modules and what can be seen when accessed.

It had always been envisaged that there would only be a minimum of two user profiles assessing the Salesforce Database system i.e. the PPN Resource Worker as the Data Controller and SDVC as the System Administrator. While additional licences were provided to each PPN, additional access should only be granted having regard to data protection regulations at the time and, since May 2018, new GDPR requirements.

To ensure compliance with GDPR in the matter of access, the Department has requested SDVC as the System Administrator, to carry out an audit of users of the database. This audit will simply identify users in each PPN to establish that the system is being accessed only by those who should be accessing it. This audit is not concerned about regularity of use nor, the data that is being accessed.

On a final note, should a PPN engage a 3rd party developer to do integration work between their website and database or any other similar type work that involves the database, the PPN should inform South Dublin County Volunteer Centre in writing and in advance of work taking place. As the System Administrator and national database support body for all PPNs, SDVC require sight of, and an understanding of any changes being made to the database so that they can continue to provide support. Be advised, that projects carried out by 3rd parties would be expected to include their own levels of support as part of the project contract. SDVC's support contract with the Department extends only to the database.

Where access and or use to the database is being granted to or required by 3rd party developers, GDPR requirements must be strictly adhered to.

Yours sincerely

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