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HOCS

DFC COVID-19 RECOVERY PLAN – DATA SHARING PROTOCOLS

David

Colm Devine, EY, has been in touch with the Department for Communities to discuss their offer of assistance with data analytics to help support vulnerable people during the Covid-19 pandemic. The work that they are doing is impressive and could be very beneficial to us at NI level across a number of Departments as we develop our Recovery Plans. However, this approach does require clearance for Departments to share data across Departmental boundaries and with EY.

EY is already working with DfC to support the development of our Recovery Plan across benefits and employability. They have advised us that we should seek to build on work already undertaken for DoH where a series of Health related datasets have been integrated on a cloud based platform (Azure) to facilitate analysis of those deemed particularly vulnerable to Covid-19. EY are proposing that DfC data could also be securely hosted on this platform giving both departments the facility to merge their data to provide a more comprehensive picture of the vulnerable cohort. This could help identify, track and monitor specific categories of vulnerable people and target support to them.

A joined up approach as proposed above would clearly be beneficial, however it is contingent on having a lawful basis to share and process personal data. Advice from the Information Commissioner's Office and the DfC Data Protection Officer, indicates that there is nothing in the GDPR / DPA that permits a blanket approach for data sharing, each case of sharing and processing personal data must be looked at on its own merit and data can only be shared for a very specific purpose. Sharing large amounts of personal data with another department for multiple uses or an open ended period via a shared platform would appear to be outside that scope.

EY referenced previous high level discussions with yourself and Peter May on the potential to loosen data sharing restrictions during the period of the pandemic. While the GDPR includes a provision that personal data may be processed on the basis that it is necessary to protect the "vital interests" of the data subject, this essentially applies in "life-or-death" scenarios and would not be applicable to building a database of potentially vulnerable people.

Undoubtedly this is a complex issue; however following my discussions with Colm Devine, he has suggested that you may be able to provide some clarity on the potential to relax data sharing protocols in the pandemic period.

Personal Data

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