

To: Chris Poulton[Chris.Poulton@ofgem.gov.uk]; Karen Wood[Karen.Wood@ofgem.gov.uk]; Gareth John[Gareth.John@ofgem.gov.uk]; Simon King[Simon.King@ofgem.gov.uk]
From: Teri Clifton
Sent: 2014-05-13T08:58:08Z
Importance: Normal
Subject: RE: DETI data sharing
Received: 2014-05-13T08:58:10Z

Hi Chris
I'm trying to get hold of Peter to confirm who will be the interim contact until they recruit. As soon as I know, I will let everyone have contact details
Regards
Teri

From: Chris Poulton
Sent: 13 May 2014 08:48
To: Karen Wood; Gareth John; Teri Clifton; Simon King
Subject: RE: DETI data sharing

Thanks for this Karen
Will our contact at Deti do this in there last couple of days?!

From: Karen Wood
Sent: 09 May 2014 12:09
To: Gareth John; Teri Clifton; Simon King; Chris Poulton
Subject: RE: DETI data sharing

I have drafted a data sharing protocol for DETI. Four pages was a little ambitious as the key information about security of data and DPA principles is all relevant. I have also included an annex of the data we could provide – based on what we are currently providing to DECC – for DETI to consider. I have added comments where DETI need to further consider content and where our legal review needs to be focussed. The Annex is the bulk of the document hence the number of pages.

The key areas that need to be resolved cover:

- DETI to include information on how the data will be secured and a system to which we can securely transfer the data
- All legislation references will need to be checked – specifically the primary legislation references. If DETI are understaffed we could offer to do this as part of our legal review.
- In terms of the reason for requesting the data a little more detail other than a direct reference to the regulations/Administrative Arrangements. I have used the wording from the DECC protocol which neatly covers reasons for having the data. This is where we need to have some clarity from legal on whether they will be content that this and the covering DPA principles will be sufficient or whether they are looking for more specific justification through the RHI regulations and primary legislation.

This will need to be reviewed by Paul Kitcher once DETI have confirmed their systems on securing and transferring the data.
Karen

Karen Wood
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From: Gareth John
Sent: 02 May 2014 14:32
To: Karen Wood; Teri Clifton; Simon King; Chris Poulton
Subject: RE: DETI data sharing

Thanks Karen,
As discussed if you can lift the relevant bits to a create a Data sharing protocol for DETI (but hopefully only 4 pages or so?)
Chris – have you had the discussion with Cathryn yet? – this will help make it light touch when we get legal to give it the once over.
You can then either , send over to John Mills and PDF sign and send back – or you could have a grand signing ceremony when he comes over for a Domestic demo which may be nice. This would give us opportunity to try and square the grants issue as well.

Ideally we want to get all our actions on DETI wrapped by wed/thurs next week so Chris can decide when to update John King.

Teri – can you drop round a brief not updating the 4 or so points on progress and planned next steps to resolutions

Regards

Gareth

Gareth John

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From: Karen Wood

Sent: 02 May 2014 13:52

To: Gareth John; Teri Clifton; Simon King; Chris Poulton

Subject: DETI data sharing

Please see the advice from Paul Kitcher.

The format of the DECC DSP could easily be used as a starting point – attached for information – and subject to legal advice on our status with DETI we could replicate the sections relating to legal basis, security and assurance, data protection principles. The sections outlining the reasoning for and use of the data could be greatly reduced and again how much is required will depend on the legal advice.

As we are already providing data to DECC we could replicate the same monthly report for DETI. This contains all the information they have said they require (and more) and in the long run will mean less likelihood of us having to produce further ad hoc reports.

In terms of transferring the data then Paul has suggested we check with DETI whether they have a secure portal similar to that which DECC use. If not there are other secure ways of transferring the data. In terms of how DETI store the data this is a matter for them. They would be the data controller once we had transferred the data.

I am happy to use the existing DSP format to create a draft DETI version.

Karen

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From: Paul Kitcher

Sent: 02 May 2014 13:20

To: Karen Wood

Cc: Paul Owen

Subject: RE: Transfer and security of personal data

Hi Karen,

A DSP does not have to be anything too complex, but, if worst come to worst we could clone the DECC DPS, we'd at least be starting from the pinot where we had something our lawyers have signed off (not sure how much the NI regs would change that). A DSP will tell DETI that we are really serious about the protection of this information & push them towards appropriate technical protection.

As far as transferring data is concerned there are a number of ways that it can be done securely. A tried and tested method is Secure File Transfer Protocol (SFTP). GSI may be secure enough, for DECC we use the 'oil portal' which is a dedicated transfer point. DETI may well have something they uses which is similar.

DETI need to decide on their storage regime – if we specify a minimum (and then they get the tech set up wrong) then I suspect we would have liability as well as them.

Copying in Paul Owen who has more expertise on the tech stuff than I do ☺.

Paul Kitcher

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Annotated by RHI Inquiry

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From: Karen Wood
Sent: 02 May 2014 12:27
To: Paul Kitcher
Subject: Transfer and security of personal data

Paul

I am currently working to produce a data sharing protocol with DETI who are responsible for the Northern Ireland RHI scheme. We administer the scheme on their behalf through administrative arrangements rather than through regulations so the relationship is slightly different in terms of how we manage the data.

Two questions for you:

- I am interested to hear your thoughts on whether, in sharing data, this needs to be done through a detailed formal data sharing protocol, or can we have a less formal document that just sets out the legal basis, security and assurance and DPA aspects of sharing data?
- Secondly – and most importantly – we need to set up with DETI how this data will be transferred and secured. I would appreciate your comment on the following given that we will be providing personal data in the form of names, addresses and contact details. For this type of data what are the minimum requirements for DETI to store this information and do they need to provide details of this? For us in transferring this data what are the minimum requirements for us to send this data securely, for example, is using gsi secure enough or will the data have to be encrypted before it is sent or do we have to have in place something similar to the secure portal created by DECC for transferring data?

Happy to discuss in person if that is easier otherwise I would be most grateful for you insight on the above. I would appreciate your thoughts as soon as possible.

Kind regards

Karen

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