**GPA Global Privacy and Data Protection Awards 2022**

**Entry Form**

To submit an entry to the GPA Global Privacy and Data Protection Awards please complete and email this form to [secretariat@globalprivacyassembly.org](mailto:secretariat@globalprivacyassembly.org) **no later** **than 17 June 2022.**

Note: GPA member authorities can submit as many entries as they wish, but a separate form should be used for each different entry, submitted by the deadline above.

Languages: The GPA documentation Rule 6.2[[1]](#footnote-2) applies.

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| 1. **CONTACT DETAILS FOR THIS ENTRY** | | |
| Privacy/Data Protection Authority: | Irish Data Protection Commission | |
| Person completing this form: | Gary | Russell |
|  | *First name* | *Last name* |
| Job title: | Assistant Commissioner, Supervision | |
| Email address: | [garussell@dataprotection.ie](mailto:garussell@dataprotection.ie) | |

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| 1. **ELIGIBILITY** | |
| By submitting this entry, I confirm that (*please tick all boxes to confirm)*: | |
|  | The Authority is a member of the Global Privacy Assembly |
|  | The initiative described in this entry was undertaken since January 2020. |
|  | I am aware that the information in the entry (other than the contact details in 1(a) above) will be publicised by the GPA Secretariat. |

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| 1. **CATEGORIES** | |
| Please indicate which category you wish to enter.  *Please tick* ***one;*** *please use a separate form for each category you wish to enter:* | |
|  | Education and Public Awareness |
|  | Accountability |
|  | Dispute Resolution and Enforcement |
|  | Innovation |
|  | People’s Choice |
| 1. **DESCRIPTION OF THE INITIATIVE** | |

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| 1. **Please provide a brief summary of the initiative** *(no more than 75 words)* |
| The Data Protection Commission has been actively monitoring and enforcing Article 37 of the GDPR. This project resulted in compliance in the public sector with Article 37 moving from 69% to 100%. One public body was issued a Reprimand follow an Inquiry.  The project has resulted in a rise in compliance in the private health space from 42% to 100% and more than 170 additional organisations becoming compliant with Article 37 of the GDPR. |

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| 1. **Please provide a full description of the initiative** *(no more than 350 words)* |
| The Data Protection Commission (DPC) has been actively monitoring and enforcing Article 37 of the GDPR. Over the course of late 2020 to 2022 the DPC wrote to several hundred public and private sector organisations concerning the obligations of Article 37 of the GDPR.  This project resulted in compliance in the public sector with Article 37(1) and 37(7) moving from 69% to 100%.  In February 2022 the DPC launched an Inquiry in to one public sector organisation following a lack of engagement. The Decision for the Inquiry was issued in May 2022. The Inquiry used an expedited Inquiry format. The Decision found that the public body had failed to comply with Articles 37(1), 37(7) and 31 of the GDPR, and issued the organisation with a Reprimand. This Decision showed that the obligations of GDPR remained during the COVID19 health crisis and that there should be no circumstances whereby a data controller could fail to respond to requests for cooperation from a data protection authority.  The initiative also targeted private sector organisations that the DPC considered may warrant the designation of a data protection officer. This resulted in a rise in compliance in the private health space from 42% to 100%. Over 80% of banking related organisations have designated a DPO, up from 69%, with the remainder having some kind of data protection professional responsible for compliance.  More than 170 additional organisations have designated data protection officers as a result of this initiative. The publication of the Inquiry in to the public body that resulted in a Reprimand serves to promote compliance and show that the DPC is supportive of the position of DPO, and takes cooperation with the Supervisory Authority seriously. |

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| 1. **Please explain why you think the initiative deserves to be recognised by an award***(no more than 200 words)* |
| This initiative was a monitoring and enforcement exercise across the public sector in Ireland that resulted in 100% compliance with Article 37 of the GDPR.  The Inquiry that was initiated in February 2022 and completed in May 2022 demonstrated that the Data Protection Commission will hold data controllers, including public bodies, to account where non-compliance with GDPR is evident.  The Initiative also resulted in a significant increase in DPO numbers across the private sector. The designation of additional Data Protection Officers can only enhance compliance with data protection law, to the ultimate benefit of data subjects. |

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| 1. **Please include a photograph or image, if you wish***(This will be published with your entry on the GPA website. The image can be pasted into the box below, be sent as an attachment or a link may be provided)* |
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| 1. **Please provide the most relevant link on the authority’s website to the initiative*,* if applicable** *(The website content does not need to be in English)* |
| *Summary of Inquiry Decision:* [*https://www.dataprotection.ie/en/dpc-guidance/law/decisions/Pre-Hospital-emergency-care-council-May-2022*](https://www.dataprotection.ie/en/dpc-guidance/law/decisions/Pre-Hospital-emergency-care-council-May-2022)  *Full Decision:* [*https://www.dataprotection.ie/sites/default/files/uploads/2022-05/IN-22-2-1%20PHECC%20Decision%20Final.pdf*](https://www.dataprotection.ie/sites/default/files/uploads/2022-05/IN-22-2-1%20PHECC%20Decision%20Final.pdf) |

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| 1. **Please provide any other relevant links that help explain the initiative or its impact or success***(e.g. links to news reports or articles):* |
| *DataGuidance.com coverage* [*https://www.dataguidance.com/news/ireland-dpc-issues-reprimand-phecc-dpo-and-cooperation*](https://www.dataguidance.com/news/ireland-dpc-issues-reprimand-phecc-dpo-and-cooperation)  *Annual Report 2021 (pages 97 & 98)* [*https://dataprotection.ie/sites/default/files/uploads/2022-02/Data%20Protection%20Commision%20AR%202021%20English%20FINAL\_0.pdf*](https://dataprotection.ie/sites/default/files/uploads/2022-02/Data%20Protection%20Commision%20AR%202021%20English%20FINAL_0.pdf) |

1. [GPA Rules and Procedures](https://globalprivacyassembly.org/wp-content/uploads/2020/10/GPA-Rules-and-Procedures-October-2020.pdf), Rule 6.2 ‘Assembly documents’:

   Without prejudice to section 4.2, Assembly documents, including accreditation and observer applications may be submitted in English or in another language. In the latter case, the documents shall be accompanied by an English version. Members with the ability and the resources to do so are encouraged to translate proposed resolutions and other Assembly documents such as the Assembly Rules and Procedures. [↑](#footnote-ref-2)