

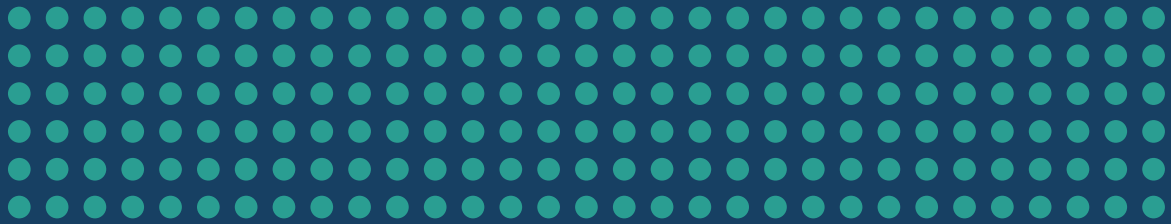
OCTOBER 2017

COMPREHENSIVE
GUIDE TO
SAFE REGISTRATION
AND THE PUBLIC
SERVICES CARD



An Roinn
Gnóthaí Fostaíochta agus Coimirce Sóisialaí
Department of
Employment Affairs and Social Protection

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1

WHAT IS SAFE REGISTRATION?

SAFE registration is the process used by the Department of Employment Affairs and Social Protection to establish and verify a person's identity so that it can be sure that –

- a) the person using its service is the person they claim to be,
- b) that nobody else is using that person's identity for the purpose of claiming a payment or service,
- c) that the person is not claiming another payment or using another service under a different identity and in addition,
- d) to minimise the requirement for people to provide the same identity information over and over again when accessing different services

The acronym **SAFE** stands for '**Standard Authentication Framework Environment**'. It is a standard for establishing and verifying an individual's identity for the purposes of accessing public services which was agreed by the Government in 2005.

This SAFE standard has four levels:

SAFE 0 = No assurance of identity

SAFE 1 = Balance of probabilities (the minimum authentication level for the allocation of a PPS Number)

SAFE 2 = Substantial assurance (the minimum authentication level for issuing a Public Services Card)

SAFE 3 = Beyond reasonable doubt (typically by use of technology such as fingerprinting)

The Department of Employment Affairs and Social Protection is implementing **SAFE 2** registration on a phased basis with its customers and customers of other public services that require identity verification to a substantial level of assurance.

2

WHAT ARE THE ADVANTAGES OF SAFE REGISTRATION?

SAFE Level 2 (SAFE 2) registration, used by the Department of Employment Affairs and Social Protection, allows a person to verify their identity once not just for access to services provided by the Department but also for an increasing number of public services provided by other State agencies – for example the Passport Office. As more public service providers move to using **SAFE 2**, people who are already registered to **SAFE 2** will not need to repeatedly register their identity information when accessing public services.

In addition once a person is registered to **SAFE 2** they can be issued with a Public Services Card (PSC). This card is an easy to use means of verifying identity when collecting welfare payments and using services funded by the Department of Employment Affairs and Social Protection such as the free travel scheme. The PSC replaces other identity and entitlement tokens including the Social Welfare Services Card, the ‘pensions book’, and the paper free travel pass with one convenient identity card.

SAFE 2 registration also protects the public interest by helping to minimise identity fraud and detect fraudulent claims in our welfare system.

3

IS IT INTENDED TO MOVE TO SAFE3 LEVEL AUTHENTICATION?

SAFE 2 registration is provided for in legislation. The Department of Employment Affairs and Social Protection has no plans to increase its identity verification requirements to **SAFE Level 3**. Any such increase would have to be provided for in legislation that would have to be debated in, and passed by, the Oireachtas.



4

DO I HAVE TO COMPLETE THE SAFE PROCESS?

Yes, all recipients of welfare services and payments in Ireland have or will be asked to complete the **SAFE** registration process (some exceptions may be made for example in respect of people with profound disabilities). Failure to complete a **SAFE** registration process when requested can result in refusal of a new welfare claim or withdrawal of an existing payment or benefit.

5

DO I HAVE TO HAVE A PUBLIC SERVICES CARD TO ACCESS A SERVICE OR BE PAID A BENEFIT?

The Department of Employment Affairs and Social Protection makes it clear to customers in receipt of welfare payments or entitlements that they do need to register to **SAFE 2**, in accordance with the relevant legislative provisions, to access or to continue to access those payments/entitlements. Once a customer completes the **SAFE 2** registration process, they may be issued with a Public Services Card (PSC). The PSC is replacing older documents used to show entitlement to a benefit, including the social welfare services card and the paper travel pass. Accordingly it will in future be necessary to produce a PSC as proof of identity for certain types of transactions, including collecting welfare payments in cash at post offices and availing of free travel on public transport.

6

HOW LONG IS THE **PUBLIC SERVICES CARD** VALID FOR?

Each card has a validity period of up to 7 years. Validity can be dependent on the circumstances of the individual e.g. in circumstances where a free-travel entitlement is time-bound. A new card will issue provided one is required by the individual. PSC holders will be written to three months in advance of their card expiring advising them to renew their PSC. You do not have to go through the **SAFE** process again to renew your card but a new photograph is required. See also Question No. 23.

7

HOW DO PEOPLE REGISTER TO **SAFE 2 STANDARD**?

The Department operates a number of methods to **SAFE 2** register a person. The usual method involves a combination of all of the following –

- a face-to-face meeting at an Intreo centre or a dedicated **SAFE** registration centre
- the collection and verification of the basic identity information known as the person's Public Service Identity (PSI) data set (See Question 18),
- the examination/validation/verification of at least two documents supporting identity, and
- photo-matching.

As part of the verification process the person's photo is run through software to check against other photos that have already been taken during other **SAFE** registrations. This is to detect and/or prevent duplicate registrations.

In some cases, where a customer authenticates their identity in another face-to-face engagement, the Department may collect elements of the PSI data by post and, with the consent of the customer, utilise existing photographs to complete the **SAFE 2** process. This eliminates the need to attend at an Intreo centre or a dedicated **SAFE** Registration centre specifically for the purpose of registering to **SAFE 2**.

The Department can also provide a mobile registration service to cater for people who have difficulty attending an Intreo centre or a **SAFE** registration centre.

8

WHAT DO I HAVE TO BRING TO MY SAFE REGISTRATION APPOINTMENT?

A. Evidence of identity:

Irish citizens born in the Republic of Ireland	Current Irish passport or current Irish or UK driving licence or Irish learner driver permit. If you are adopted, please bring your adoption certificate with you. *
Irish citizens via naturalisation or Foreign Birth Registration	Current Irish passport or Certificate of Naturalisation or Foreign Birth Registration certificate and Irish or UK driving licence or Irish learner driver permit. *
Irish citizens born in Northern Ireland and UK citizens	Current passport, or your birth or adoption certificate and current driving licence
EU citizens (other than Irish and UK)	Current passport or national identity card
Non-EU citizens	Current passport or 1951 travel document

* If you are an Irish or UK citizen and do not have a Passport or Driving licence as identification, you may still be issued with a PSC. When you attend you will have an in-depth interview and additional information gathered during this interview will be verified in order to confirm your identity.

For Irish citizens born in the Republic of Ireland, birth details can be verified online in most cases with the General Register Office. However, in some cases, it is not possible to locate the birth registration, so the person will need to return with a copy of his/her birth certificate.

If you wish to get a copy of your Irish birth certificate for **SAFE** registration purposes, you can get it from the Registrar at a reduced rate when you show your **SAFE** invitation letter.

The Department does not have access to the adoption register, so adopted people should bring their adoption certificate with them when attending their appointment.

B. Evidence of address (applies to everyone, whether an Irish, EU or non-EU citizen):

You need to show evidence of your address. You can use any of the following documents to do this (it must show your name and address):

- A household utility bill
- An official letter/document
- A financial statement
- Property lease or tenancy agreement
- Confirmation of address by a third party such as a school principal/administrator, accommodation/property owner*or manager.

*If you are staying with friends or relatives an original household bill plus a note from the bill holder confirming your residency at the bill address is acceptable. This note can be written on the bill itself.

C. Additional helpful documents

If you have any of the items listed below, you should bring them along with you as they may also help to confirm your identity. If you do not have any of these, you should bring other documents or forms of photo ID instead*.

- Irish Free Travel Pass
- Medical card issued under the General Medical Service
- European health insurance card
- Credit/debit card
- Student card

*The following items are not acceptable as proof of identity for the purpose of **SAFE** registration: Baptismal certificate, work ID card, Garda form ML-10, Garda age card, photocopied certificates or documents and expired documents generally.

You should also bring your mobile phone with you, if you have one. During the **SAFE** registration process we can validate your mobile phone number which will make it easier for you to register for a MyGovID verified account. You will need this account if you wish to access public services online. See Question No. 36 for further information.

9

HOW LONG DOES THE SAFE REGISTRATION PROCESS TAKE AND WHEN WILL I GET MY PUBLIC SERVICES CARD?

The process takes about 15 minutes to complete, once all required documents are presented. Once complete it takes 5-7 working days for your PSC to arrive by post to your address.

10

IS THERE A CHARGE FOR THE PSC?

There is no charge to the individual for the Public Services Card.

11

WHY ISN'T A PASSPORT OR DRIVING LICENCE SUFFICIENT TO ESTABLISH IDENTITY FOR THE DEPARTMENT OF EMPLOYMENT AFFAIRS AND SOCIAL PROTECTION?

Taken individually, neither a passport, nor a driver's license is enough to validate an identity to **SAFE** Level 2 because they were not issued following a **SAFE 2** identity verification process. However, in combination, and with the other data and processes detailed above, passports and driving licences that do not meet the **SAFE 2** standard can be used in the methods to verify an identity to **SAFE 2** level.



12

WHAT PROCESSES ARE IN PLACE TO **SAFE REGISTER** CUSTOMERS WITH A DISABILITY?

At present the Departments databases do not include details on the nature and degree of disability, hence the need to write to customers to establish if they have particular requirements to enable them to register for the PSC.

Where customers are unable to attend in person, other methods for registration are available. A mobile registration facility is available to register customers who face substantial challenges in presenting at a Department location but still want to continue to avail of their free travel entitlement. Group registration at community venues is the preferred mode of utilising these mobile registration facilities but in very exceptional circumstances, single individuals may be registered at their place of residence.

Where a customer is incapacitated to the extent that they may not be able to understand what is entailed in **SAFE** registration the Department would reasonably expect that their agent (if an agent is appointed) or carer would assist them in making contact with the Department.



13

WHAT GOVERNMENT ENTITIES CAN CONDUCT SAFE REGISTRATION?

There are a number of State bodies specified in law in Schedule 5 of the Social Welfare Consolidation Act that can **SAFE** register a person. See Question 19 for more information on specified bodies.

However, the Department of Employment Affairs and Social Protection is the sole body in the State that currently provides **SAFE 2** registration. The Department provides this registration service at over 100 locations throughout the State including its Intreo centres and some dedicated SAFE registration centres.

14

WHAT IS THE LEGAL BASIS FOR SAFE REGISTRATION?

The main legal powers providing for and relating to **SAFE** registration are set out in the Social Welfare Consolidation Act, 2005 (as amended) as follows –

- Sections 262 and 263B provide for the verification of identity to facilitate the issuing and use of a Personal Public Services Number (PPS Number or PPSN).
- Sections 263, 263A and 263B provide for the verification of identity to facilitate the issuing, use and cancellation of a Public Services Card (PSC).
- Section 241 provides that a person must satisfy the Minister to his/her identity when making a new claim and sets out how that can be done.
- Section 247C provides that an existing claimant must satisfy the Minister to his/her identity, sets out how that can be done, and provides for disqualification where an existing claimant fails to do so.

A table providing more detail on the key legislative provisions is provided at Appendix 1

15

IS SAFE REGISTRATION MANDATORY FOR ALL RESIDENTS IN IRELAND?

It is not mandatory for all people resident in Ireland to be **SAFE 2** registered.

However it is necessary, and has always been necessary, that people using high value public services are required to provide some proof of identity. Now, in order to ensure services are provided to the right person and to support efficient service delivery a growing number of public service providers are requiring that proof of identity is underpinned by the SAFE 2 identity verification standard.

16

WHY ARE PUBLIC SERVICE PROVIDERS REQUIRING ME TO SUPPLY THE **PSC TO AUTHENTICATE MY IDENTITY?** WHY ARE MY OTHER FORMS OF IDENTITY SUCH AS MY **PASSPORT OR DRIVING LICENCE NO LONGER AN ACCEPTABLE FORM OF ID?**

Until recent times, many public services were provided to people who had their identity verified only to the **SAFE** Level 1 standard. For example, “identity documents” such as Passports and Driver Licences were issued following SAFE Level 1 equivalent registration processes.

Since the introduction of **SAFE** Level 2 registration in 2011, more services are now moving to identity verification at this level to ensure a substantial level of assurance of identity. While it is a matter for each public service provider to determine the appropriate level of identity verification required for each of its services, it is Government policy that **SAFE 2** registration is required for access to all services that require substantial proof of a person’s identity.

SAFE Level 2 identity verification benefits the public and public service providers by –

- simplifying the identity registration process and reducing the need for people to register separately with multiple service providers;
- reducing the need for service providers to duplicate costly and time consuming identity registration processes;
- reducing the number of people fraudulently claiming to be someone else as it provides the most robust identity proofing process to protect personal data used in the public service; and
- facilitating the secure provision of high-value and personalised public services online through the MyGovID platform underpinned by SAFE 2 identity verification.

17

WHAT ARE THE SERVICES THAT WILL REQUIRE AN INDIVIDUAL TO HAVE SAFE REGISTERED AND THE TIMELINES BY WHICH **SAFE 2 REGISTRATION** WILL BE REQUIRED?

SAFE 2 identity verification is currently required for –

- Access to Social Welfare Services (including Child Benefit and Treatment Benefits)
- First time adult passport applicants in the state
- Replacement of lost, stolen or damaged passports issued prior to January 2005, where the person is resident in the State
- Citizenship applications
- Driver Theory Test Applicants
- Access to high value or personal online public services, e.g. Social Protection's MyWelfare and Revenue's MyAccount services via MyGovd, the identity authentication mechanism for accessing public services online.

The Department of Public Expenditure and Reform recently published the eGovernment Strategy 2017 – 2020 which lists a number of public services for which **SAFE 2** registration will be required. These are set out in the table below with relevant timelines. Others are likely to be listed in the future. The transition plans, including communications, will be developed by the Departments/agencies concerned working with the Office of the Government Chief Information Officer (OGCIO) in the Department of Public Expenditure and Reform.

DEPARTMENT OFFICE	SERVICE	NOTE	DATE
Dept. Education and Skills	School Transport Appeal	Submission of a school transport appeal will require submitter to be SAFE 2 registered; Online submission of appeal will be available via MyGovID	Sep-17
Dept. Employment Affairs & Social Protection	Treatment Benefit	Eligibility checking for treatment benefits (dental/optical/aural) available via MyWelfare using MyGovID	Nov-17
Road Safety Authority	Drivers Licence Application	Driver licence applications will require applicants to be SAFE 2 registered; Online renewal of drivers licences to be introduced and use MyGovID	Mar-18
Student Universal Support Ireland (SUSI)	Student Grant Application	MyGovID will be used as the authentication mechanism to provide access to the student grant scheme for the 2018/19 academic year; Applicants will have to be SAFE 2 registered in order to make an application	Apr-18
Dept. Education and Skills	School Grant Appeal	Submission of a school grant appeal will require submitter to be SAFE 2 registered; Online submission of appeal will be possible via MyGovID	Sep-18
Health Service Executive	Online Health Portal	MyGovID will be used as the authentication mechanism to provide access to a new online Health portal being launch in 2018 – this portal is to provide access to a growing number of health related services online.	Sep-18
Dept. Agriculture, Food and the Marine	Agfood.ie	Support for individual access to the Agfood.ie set of services via MyGovID	Sep-18
Dept. Justice and Equality; Dept. Employment Affairs & Social Protection	Proof of Age	Introduce the optional use of the PSC as an Age Card for use as a Proof of Age service	Q3-18
Dept. Foreign Affairs and Trade	Passport Application	All adult passport applications, new and renewals, for residents in Ireland will require applicants to be SAFE 2 registered; Online renewal of adult passports will use MyGovID	Q4-18



18

WHAT IS THE PUBLIC SERVICE IDENTITY SET?

The public service identity (PSI) set used to verify a person's identity comprises each person's –

- PPS Number
- Surname
- Forename
- Date of birth
- Place of birth
- Sex
- All former surnames (if any)
- All former surnames (if any) of his or her mother
- Address
- Nationality
- Photographic image
- Signature
- Date of Death, where relevant
- Certificate of Death, where relevant
- Any other information as may be required for authentication purposes that is uniquely linked to or is capable of identifying that person
- Any other information that may be prescribed which, in the opinion of the Minister, is relevant to and necessary for the allocation of a Personal Public Service Number

The PSI dataset is defined in Section 262 (1) of the Social Welfare Consolidation Act 2005 (as amended) and the individual data items are set out at Section 262 (3) of that Act.

During a **SAFE** registration, some security questions are also asked and the answers to these are recorded – these are required as subsequent security checks when a person contacts the Department about their PSI data or their PSC. The types of security questions asked are set out at Appendix 3.



19

WHO ARE THE BODIES WITH WHOM THE DEPARTMENT SHARES **PSI DATA**?

The full list of specified bodies that may use PSI data under Sections 260-265 of the Social Welfare Consolidation Act 2005 (as amended) is contained in Schedule 5 of the Social Welfare Consolidation Act and is included at Appendix 2 of this document. Separately, Appendix 4 lists those bodies that actually received Public Service Identity data in 2016 that was collected by the Department of Employment Affairs and Social Protection along with the relevant legislative basis under which they could access and use this data. Use of PSI data for specific purposes is also provided for in other legislation and these instances are outlined in that Appendix.



20

WHAT GOVERNANCE MECHANISMS HAVE BEEN PUT IN PLACE TO OVERSEE AND **UNDERPIN THE SHARING OF PSI DATA?** WILL THESE ARRANGEMENTS BE MADE PUBLIC?

The governance of the shared use of PSI data is set out in, and underpinned by, the Social Welfare Consolidation Act, 2005 (as amended). Section 262 of the Act sets out how the sharing and use of the PSI data is restricted to public service bodies specified in law or their agents (i.e., organisations working on their behalf or performing one of their public functions under contract). Designation as a specified body requires primary legislation and as such can only be done by an Act of the Oireachtas.

The primary legislative basis for the sharing of PSI data is set out in Sections 262 (5) and 262 (6) of the Social Welfare Consolidation Act. Section 262 (5) provides that where a specified body collects any element of PSI data from a person in the course of a providing a service or undertaking a transaction, that information shall also be collected for the purpose of maintaining the person's public service identity. This means that the dataset can be kept up to date by using data from the person's most recent interaction with a specified body.

Specific provision for other specified bodies using the PSI data collected by the Department is made in section 262 (6) which provides that "where a specified body has a transaction with a person, the Minister may share the person's public service identity with the specified body to the extent necessary in respect of that transaction for authentication by the specified body of the person's public service identity" and "a specified body may use a person's public service identity in performing its public functions insofar as those functions relate to the person concerned."

Such specified bodies are in all cases required to process and store data in accordance with the Data Protection Acts.

21

HOW IS THE DATA SHARED?

There are numerous means by which PSI data can be shared with specified bodies which include secure file transfers and application programming interfaces between systems, access to the contact chip on the PSC (see responses to Questions 41 and 44), access to the Single Customer View (see responses to Questions 47 - 53), and use of the MyGovID online identity verification solution (see responses to Questions 36 and 40).

22

WHEN SAFE REGISTRATION DATA IS COLLECTED FROM INDIVIDUALS THROUGH GOVERNMENT BODIES, IS THAT **REGISTRATION DATA** KEPT ON ONE CENTRALISED STATE REGISTER?

The Department of Employment Affairs and Social Protection is the sole body in the State currently undertaking **SAFE 2** registrations. During a **SAFE 2** registration, those elements of the Public Service Identity dataset (see response to Question 18) that are already held for that person are verified and updated as necessary, and missing elements are collected and verified. In that way, the Department holds a complete Public Service Identity dataset for each person that it has verified to **SAFE 2** standard.

As provided for in the Social Welfare Consolidation Act 2005 (as amended) any PSI data collected by another identified public service provider (being a 'Specified Body') can also be used, for the purpose of maintaining a person's public service identity, i.e., their PSI dataset. For the purpose of enabling shared use of the PSI data elements with Specified Bodies the Department of Public Expenditure and Reform operates a facility known as the Single Customer View. This enables each Specified Body, in accordance with permissions granted by the Department of Employment Affairs and Social Protection, to access and use the PSI dataset. This in turn facilitates the re-use of the PSI dataset and the avoidance of customers having to resubmit the same identity information on multiple occasions.

The Department of Employment Affairs and Social Protection is the data controller for the Single Customer View. Access to and use of data held in the Single Customer View database by other specified bodies is managed and controlled by the Department in accordance with the arrangements described at Question 52.

23

HOW FREQUENTLY WILL AN INDIVIDUAL BE REQUIRED TO UPDATE THEIR **DATA FOR SAFE?** E.G. PHOTOGRAPH?

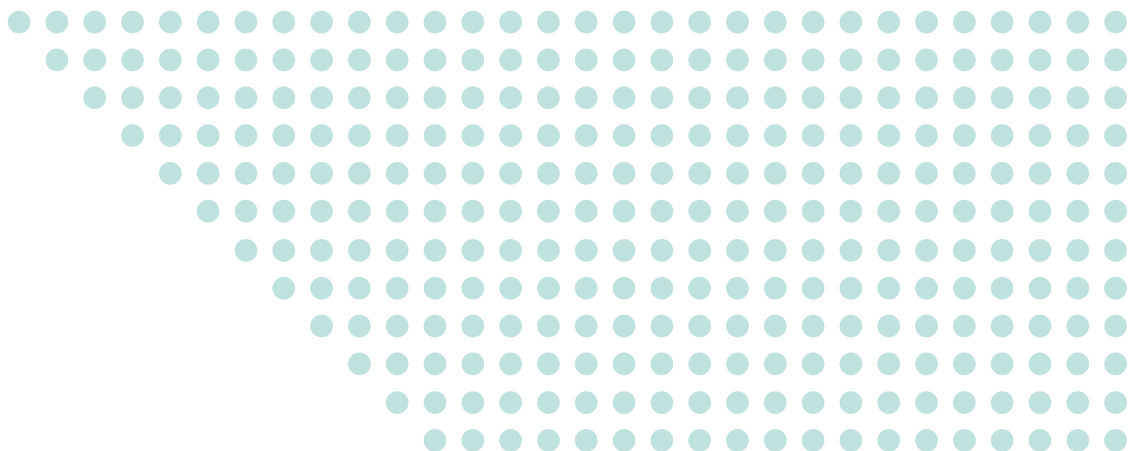
A person is only required to undertake a **SAFE 2** registration process once.

However the information verified during this process may need to be updated if a person's circumstances change. Possible changes to PSI data include change of their name (e.g. on marriage), address, nationality (e.g. on naturalisation), sex (e.g. gender re-assignment).

The Public Services Card that is issued on completion of **SAFE** registration is valid for up to 7 years. At renewal a new photograph is taken to update the new card and the PSI dataset.

New Public Services Cards may also be required when a person's status changes, e.g., a person reaching the age of 66 will be automatically issued with a new card with the 'free travel' functionality, enabling them to avail of free travel on public transport services.

Lost cards are replaced using the current elements of the PSI dataset (including photo) and will ordinarily remain valid for the validity period of the original card.



24

WHO IS THE DATA CONTROLLER FOR THAT STATE REGISTER? PLEASE INCLUDE CONTACT DETAILS FOR THE RELEVANT OFFICER, WHERE APPLICABLE.

The Secretary General of the Department of Employment Affairs and Social Protection, Aras Mhic Diarmada, Store Street, Dublin 1 is the Data Controller for the PSI dataset held by the Department. As required under Section 16 of the Data Protection Acts 1988 and 2003 these details are listed on the Register maintained by the Data Protection Commissioner.

Separately each specified body that collects or holds PSI data elements is the data controller in respect of their holding of the data on their own systems or databases. The full list of specified bodies is included at Appendix 2.



25

TO WHOM CAN I DIRECT A
DATA PROTECTION ACCESS
REQUEST UNDER S4 OF THE
IRISH DATA PROTECTION
ACTS 1988 AND 2003 IF I
WISH TO OBTAIN A COPY OF
MY SAFE REGISTRATION DATA
INCLUDING PHOTOGRAPH?

IN WHAT FORMAT WILL THE
DATA BE ISSUED TO ME -
PAPER OR ELECTRONICALLY
OR DO I HAVE A CHOICE?

IN WHAT FORM IS IT HELD BY
THE **CONTROLLER?**

The PSI dataset in respect of persons registered to **SAFE 2** standard by the Department of Employment Affairs and Social Protection is held electronically in Ireland on the Department's own IT systems based in secure datacentres owned and operated by the Department. The Single Customer View database is managed on behalf of the Department by the Department of Public Expenditure and Reform and is held electronically in a secure Government datacentre in Ireland.

Access requests for data held directly by the Department of Employment Affairs and Social Protection or for data held on the Single Customer View database are dealt with in accordance with the guidance of the Data Protection Commissioner (as set out at <https://www.dataprotection.ie/docs/Making-an-AccessRequest/963.htm>) and should be sent to:

**Subject Access Requests,
Department of Employment Affairs and Social Protection,
Shannon Lodge,
Carrick-on-Shannon,
Co. Leitrim
N41 KD81**

The identity of the person making the request must be verified before data will be provided. The data may be provided either electronically or in paper format as preferred by the person requesting the data.

26

IF I DISCOVER AN INACCURACY IN MY DATA ON RECEIPT OF A COPY, TO WHOM DO I **DIRECT A REQUEST** FOR RECTIFICATION?

While the Department makes every endeavour to ensure the accuracy of every person's data, errors or outdated information can occur on occasion. The actions required to correct such inaccuracies depend on the nature of the inaccuracy as follows –

DATA ITEM	ACTION REQUIRED
Surname	Attend at a SAFE registration centre
Forename;	Attend at a SAFE registration centre
Date of birth	Attend at a SAFE registration centre
Place of birth	Attend at a SAFE registration centre
Sex	Contact Officer in Charge, DQM section, Department of Employment Affairs and Social Protection, Shannon Lodge, Carrick-on-Shannon, Co. Leitrim
All former surnames (if any)	Attend at a SAFE registration centre
All former surnames (if any) of his or her mother	Attend at a SAFE registration centre
Address or contact details e.g. phone no	Notify the Department by phone or in writing or by calling into a Department of Employment Affairs and Social Protection office or online via MyWelfare/MyGovID.
Nationality	Attend at a SAFE registration centre
A photograph of the person	Attend at a SAFE registration centre
The person's signature	Attend at a SAFE registration centre

27

ARE SPOUSES AND FAMILY MEMBERS LINKED ON THE **SAFE REGISTER**, AND IF SO, FOR WHAT PURPOSE MAY THEY BE IDENTIFIED?

The PSI dataset does not contain relationship information and hence no relationship information is linked within the PSI dataset nor can it be shared with specified bodies for the purpose of identity verification.

28

IF I LEAVE IRELAND AND EMIGRATE PERMANENTLY, CAN I REQUEST MY **SAFE REGISTRATION** BE CANCELLED AND DELETED (I.E. EXERCISE A RIGHT TO BE FORGOTTEN)?

A SAFE registration is verification of a person's identity and of their Public Service Identity dataset. Such details are relevant for potential future claims or entitlements (as are details of social insurance contributions made etc.) and for the continued security of the person's identity (to prevent it being used fraudulently). Consequently, these details cannot be deleted. This is consistent with current data protection legislation and will, from May 2018, be compliant with Article 17 3(b) of the General Data Protection Regulation.

29

HOW IS THE DATA TECHNICALLY AND ORGANISATIONALLY SECURED BY THE CONTROLLER?

CAN I BE CONFIDENT THAT MY PERSONAL IDENTITY/REGISTRATION DATA IS SECURE ON THIS STATE REGISTER?

The Department of Employment Affairs and Social Protection is committed to ensuring that data relating to customers is securely held and used only for relevant business purposes. The Department's commitment to safeguarding data is reflected in its use of advanced data processing and storage technology hosted in secure datacentres and is reinforced by a range of legislative and administrative provisions that are designed to protect the rights and interests of our customers.

These provisions include the Official Secrets Act 1963, the Data Protection Acts 1988 and 2003, the Social Welfare Consolidation Act 2005 and the Civil Service Code of Standards and Behaviour. They impose obligations in relation to the confidentiality of official data and the protection of records against unauthorised access, unnecessary use, alteration, destruction or disclosure.

For these reasons –

- the PSI data set is stored and maintained in the Department's own secure datacentres using best-in-class data security systems;
- the Single Customer View database is stored in a secure government data centre. Access to the data is tightly controlled and restricted to specified bodies on the private Government Network. All data access is logged and regularly audited;

- access to the dataset is restricted to those members of staff who have a business need to reference the data;
- all members of staff are reminded regularly through various awareness, education and training initiatives of data protection law and the primacy of client confidentiality, the obligations they have to maintain both, and the potential penalties that are applicable in respect of any breach;
- all members of staff must, on an annual basis, sign undertakings that they have read, and will act in accordance with, data protection policies and guidelines;
- staff that fail to comply with these guidelines are subject to disciplinary action (up to and including dismissal). In addition they may be subject to potential legal action including possible claim for compensation for distress/damage caused to the customer;
- all accesses to the data are logged and are subject to independent audit;
- Twenty eight security audits have been undertaken within the last five years (2012 – 2017), twenty two of these are completed, and six are in progress. Three Penetration tests, two Privacy Impact Assessments, and a Risk Assessment of the Information Systems environment were also carried out during this timeframe;
- a dedicated Business Information Security Unit (BISU) is responsible for overseeing information security and data protection awareness and compliance across the Department,
 - BISU develops, reviews and communicates policies, guidelines and procedures covering the use of data to help effectively implement data protection legislation and information security best practice,
 - It supports business areas by providing advice on data protection and information security matters relevant to their work,
 - it works closely with our Information Technology staff on technical security matters, and
 - it provides a liaison function with the Office of the Data Protection Commissioner on data protection matters and policies.



30

WHAT COMPANY PRODUCES THESE CARDS AND WHAT SAFEGUARDS ARE IN PLACE TO SAFEGUARD THE USE OF DATA BY THIS COMPANY?

FOR **HOW LONG** IS THE CONTRACT TO BE IN PLACE BETWEEN THE CONTROLLER AND THE PROVIDER?

The PSC is produced in Ireland by an Irish-registered company called Biometric Card Services (BCS) under contract to the Department. The current contract is due to expire at the end of 2017. That contract includes a number of conditions designed to safeguard the data. For example it is a condition of contract that all data and related services provision and operation be provided on-site in Ireland and subject to the terms of the Data Protection Acts and the jurisdiction of the Irish courts. All data to be personalised onto PSCs (i.e., transferred onto cards) is provided by the Department of Employment Affairs and Social Protection to BCS over the private Government Network. Before any data is transferred, the Department and BCS systems mutually authenticate each other. The data is encrypted so that no third party can access the data, and electronically signed so that BCS can be certain that the data originates from the Department and has not been modified en route. All of these processes are implemented using strong cryptography according to international and industry standards. Once PSCs are personalised the data used to so personalise them is not retained by BCS but is destroyed as an automatic part of the personalisation process in accordance with advice provided by the Office of the Data Protection Commissioner. In addition the systems used in the card production have been subjected to audit by external experts.

31

WHAT PROTECTION MECHANISMS ARE BUILT INTO THE PUBLIC SERVICE CARD ITSELF?

The Public Services Card itself has multiple protection mechanisms, all of the highest current international standards, to prevent and detect tampering with the physical card and its contents. As well as some hidden security features, there are visual measures such as the overall graphical design, branding, microprinting, the use of optical variable ink and a kinegram. In addition, a PSC and a card reader communicate with each other by cryptographic means. Only card readers specifically programmed to accept PSCs can undertake this functionality.

32

WHAT IS THE LEGAL BASIS FOR REQUIRING SAFE 2 REGISTRATION ACROSS PUBLIC SERVICES?

The legal basis for requiring **SAFE 2** identity verification for services provided by the Department of Employment Affairs and Social Protection is set out in the response to Question 14. The legal basis for other public bodies accessing and sharing the PSI dataset is set out in the response to Question 20.

The legal basis for public bodies requiring **SAFE 2** identity verification in the provision of their services is dependent on the nature of the legal, regulatory or administrative basis on which the service is being provided and the legal, regulatory or administrative procedures being operated in the provision of that service, i.e., it differs depending on the service and will be set out in the explanatory material for that service where **SAFE 2** identity verification is required.

By way of example, under the regulations governing the Driver Theory Test (DTT), the form of application for a DTT shall be in such form as the Road Safety Authority's Driver Theory Test Service determines. As it is government policy that **SAFE 2** registration is required for access to all services that require substantial proof of a person's identity, and the PSC is proof of that registration, the service has exercised its right under the regulations and under Section 263 (3) of the Social Welfare Consolidation Act 2005 (as amended) to require the PSC as the appropriate form of ID. The Road Safety Authority, is a specified body under the Social Welfare Consolidation Act.

Similarly Sections 6(2) and 7(2) of the Passports Act 2008 provide the legislative basis for the various information and documentation requirements for application for a passport. The Department of Foreign Affairs and Trade is a specified body under the Social Welfare Consolidation Act (as amended) and, as agreed by the Government earlier this year, is working towards ensuring that by the end of 2018 all passports issued to adults resident in the State are **SAFE** Level 2 compliant.

33

IS **SAFE 2 REGISTRATION** MANDATORY FOR USERS OF PUBLIC SERVICES NOT RESIDENT IN IRELAND?

People living abroad and in receipt of Irish public services are not being requested to be registered to **SAFE** Level 2 at this time.

34

IS THE GOVERNMENT SEEKING TO CREATE A COMPLETE “**POPULATION REGISTER**” THROUGH REQUIRING **SAFE** REGISTRATION? IF SO, WHY?

The Government is not seeking to create a complete population register through requiring **SAFE** registration.

Rather, **SAFE** Level 2 registration allows a person to verify their identity once for public service purposes to a substantial level of assurance. Consequently, it eliminates the need for a person to repeatedly register their identity information when accessing public services. It makes it more difficult for someone else to claim to be a person and so helps to eliminate “identity theft” and fraudulent access to those public services and/or to someone else’s data. Accordingly, verifying identity to a substantial level of assurance ultimately reduces the administrative burden both on public service providers and on individuals accessing their services. It also facilitates those providers in making their services, particularly those of a high-value or personal nature, available through online channels (which would not be possible otherwise).

35

IS IT SUFFICIENT FOR AN INDIVIDUAL TO SUPPLY THEIR **PPS NUMBER** TO A BODY ONCE THEY ARE SAFE REGISTERED AND NOT PRODUCE THEIR PSC, PARTICULARLY IF THAT BODY IS NOT PHYSICALLY READING THE CHIP OR MAGNETIC STRIPE ON THE CARD?

Once a person completes a **SAFE 2** registration they can be issued with a Public Services Card (PSC) as a physical token that proves they have had their identity verified to the **SAFE 2** standard (simply quoting a PPS Number does not prove a person's identity nor does it prove that their identity has been verified to the **SAFE 2** standard).

It is a matter for each specified body to determine, subject to obtaining permission from the Department of Employment Affairs and Social Protection, if it wishes to access the PSI data stored on the PSC. However in most cases examination of the photographic image on the PSC and comparison of signature can validate that the card belongs to the holder.

The presentation of the card also enables the service provider to rely on the data held in the Single Customer View and compare that data with data presented at the point of transaction by the customer.

36

WHAT IS MYGOVID AND AM I LEGALLY REQUIRED TO HAVE A MYGOVID ACCOUNT?

A MyGovID account is a secure online account for accessing public services. The process for registering and using a MyGovID account proves in the online environment that the person has had their identity verified to the **SAFE 2** standard. By using what is known as two factor authentication linked to the **SAFE** registration process MyGovID assures the privacy and security of online services. For example, people registered with a MyGovID account can request online access to their PRSI contribution record or can apply online for some welfare services. It is not mandatory for people to use these online services, it is an optional benefit provided to people who are registered to **SAFE 2** level. A full description of MyGovID is available on the dedicated website www.mygovid.ie.

In addition, the MyGovID secure online identity verification system is also essential for Ireland to be aligned with the EU eIDAS regulation, which is a key aspect of the EU's eGovernment Action Plan and Digital Single Market Strategy. See Question 40 also for more information on MyGovID.

37

IS THE PSC AN IDENTITY CARD?

The Public Services Card is not a national ID card as it does not bear the characteristics of such a card. For example, it isn't compulsory for a person to have one simply by virtue of being resident in the State (which it would be if it was a National ID). Most countries with a national ID card require people to carry it with them (in some cases at all times) – there is no such law in Ireland compelling people to carry the Public Services Card.

Equally, it cannot be requested by any public or private body or person not included as a specified body in Schedule 5 of the Social Welfare Consolidation Act 2005 (as amended). In many countries operating a national ID card, private bodies are required by law to check a person's identity through their national ID card before providing them with service, particularly in financial and insurance sectors. By contrast, the PSC can only be used by public bodies specified in the legislation and their agents in the context of conducting a public transaction with the person concerned. Therefore, the legislation narrows its application considerably and proves that the intent of the card has always been limited to the provision of public services.

38

MUST THE PSC BE CARRIED AT ALL TIMES BY INDIVIDUALS IN THE STATE AND/OR CAN ANY MEMBER OF **AN GARDA SÍOCHÁNA** ASK THAT THE CARD BE PRODUCED?

It is not necessary to carry a Public Service Card at all times.

An Garda Síochána is not a specified body under the Social Welfare Consolidation Act 2005 (as amended) – except in respect of its own members – and consequently cannot request the card from a person. In fact, it would be an offence for a member of An Garda Síochána to request a person’s PSC under Section 263 (4) of the Social Welfare Consolidation Act 2005 (as amended).



39

IS IT INTENDED TO INCREASE THE SCOPE OF THE CARD BEYOND THE **SCHEDULE 5** BODIES AS OUTLINED IN THE LEGISLATION?

At this time there are no plans to expand the range of specified bodies. Any increase in the number of specified bodies would have to be provided for in legislation and consequently would have to undergo Oireachtas scrutiny prior to enactment.

One of the provisions set out in Section 5 of the Social Welfare, Pensions, and Civil Registration Bill 2017 would, if enacted, enable customers to volunteer their PSC where they wish to use it as a form of proof of identity and/or age. However, it is important to note that it would remain an offence for a non-specified body or person to request or demand the production of a PSC, or to access data held on the PSC. The proposed legislation would not change the number of specified bodies that can request the PSC. It would simply give individuals the option to use their PSC if they wished, as proof of identity and/or age, in transactions with non-specified bodies.



40

WHY DO I NEED A PSC FOR MYGOVID IF MY PHYSICAL CARD IS NOT READ AS PART OF THE PROCESS OF REGISTRATION? IS IT SUFFICIENT THAT I SUPPLY MY **PPSN** AND CONFIRM I AM **SAFE 2 REGISTERED**?

To use a verified MyGovID account a person's identity must first be verified to the **SAFE 2** standard. This is because MyGovID transfers elements of the person's PSI to the Specified Body being accessed for the purposes of completing a transaction online. In addition, in the course of using MyGovID to access a public service, the customer may be permitted to view and change personal data held by that public body for the purposes of that transaction and their public function. Therefore, in order to protect a person's personal details and transactions with public bodies in the online environment, it isn't sufficient to simply provide a PPS Number and assert **SAFE 2** compliance.

As part of the application of the **SAFE 2** standard in the online environment, we seek to ensure that a person's MyGovID account is not used by another person. We do this by employing two-factor authentication each time the person uses the account. This means that, in addition to requesting a username and password (things you know), we send a one-time verification code to your verified mobile phone (something you have) which you must also provide when logging in.

It isn't necessary to get a MyGovID account when you verify your identity to the **SAFE 2** standard (although we would strongly encourage it). It is possible to set up your account later and by remote means – in other words you don't have to come back to a **SAFE** registration centre. For the same reasons as above we have to be sure that we link the account to the proper **SAFE 2** verified PSI dataset. Accordingly we will check a number of things with you – some of the details of your PSC may be included in that check. Full details on MyGovID are available on the dedicated website www.mygovid.ie.

41

WHAT **PSI DATA** IS EITHER STORED ON THE CARD OR APPEARS ON THE FRONT OF THE CARD?

The data that may be displayed on the PSC and electronically stored is set out at Sections 263 (1A) and Section 263 (1B) respectively of the Social Welfare Consolidation Act. The following sets out where each data item appears or is stored on the PSC –

- the name of the person:
 - Face of PSC and Chip
- the personal public service number (PPSN) of that person:
 - Rear of PSC, Chip, and Magnetic stripe
- a photograph of that person:
 - Face of PSC and Chip
- the signature of the person:
 - Face of PSC and Chip
- the issue number of the public services card:
 - Rear of the PSC and Chip
- the expiry date of the PSC:
 - Face of PSC and Chip
- the date of birth of that person:
 - Chip and Magnetic stripe
- the place of birth of that person:
 - Chip
- the sex of that person:
 - Chip and Magnetic stripe
- the nationality of that person:
 - Chip
- all former surnames (if any) of that person:
 - Chip
- all former surnames (if any) of the mother of that person:
 - Chip

42

DOES THE PUBLIC SERVICES CARD STORE BIOMETRICS?

No. While the card does store a person's photograph it does not store the biometric or arithmetic template of that photograph. Nor is the biometric or arithmetic template of the photo stored in the PSI dataset or shared with other public bodies.

43

WHERE IS THE BIOMETRIC OR ARITHMETIC TEMPLATE OF THE PHOTOGRAPH STORED AND WHO HAS ACCESS TO IT?

The Department of Employment Affairs and Social Protection uses facial image matching software to strengthen the **SAFE** registration process by detecting and deterring duplicate **SAFE** registration attempts. The normal digital photograph (in JPEG format) captured during the **SAFE** registration process is input into and stored in this facial image matching software. It is then modelled and searched against the Department's photo database to ensure that the person in the photograph has not already been registered using a different Personal Public Service Number or a different identity dataset. The software compares photographs by converting the image into an arithmetic template based on the individual's facial characteristics, e.g., distance between their eyes, height of cheekbones etc., and checking it against the other image templates already held in that software's database from other **SAFE** registrations. A similar approach is taken by the Passport Office in its systems when processing passport applications/renewals. Up to the end of September 2017 the Department had detected some 165 cases of suspected identity fraud as a result of this matching process.

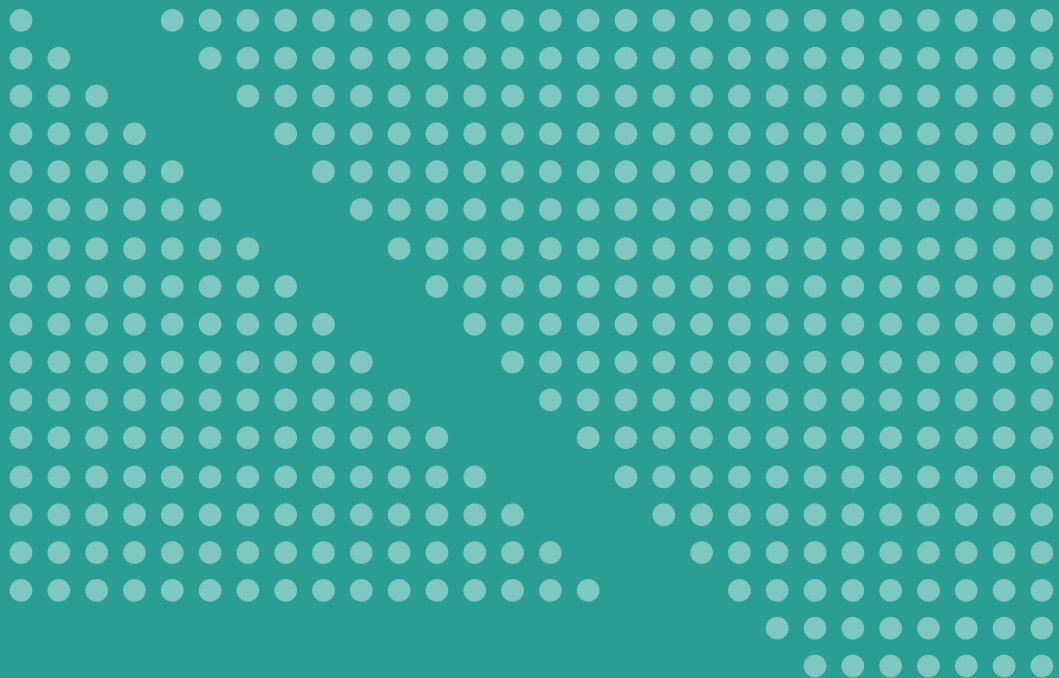
It is important to note that the arithmetic models behind the photographs do not get stored on the PSC or in the Public Service Identity dataset. Consequently, this data is not shared with any other public body. They are only stored in the facial image matching software's database held in the Department's own secure datacentres.

It is also important to note that the Department does not ask for or collect other biometric data from our customers (e.g., fingerprints, retinal scans, etc.) nor does it use advanced facial mapping cameras when taking the photo as part of the **SAFE** registration process.

44

WHAT GOVERNMENT ENTITIES AND BODIES CAN READ A) THE CHIP AND/OR B) THE MAGNETIC STRIPE ON THE CARD (PSC)?

WHAT DATA DOES AN POST READ OFF THE PSC WHEN IT PROCESSES A SOCIAL WELFARE PAYMENT?



All specified bodies may, in law, read the contact chip and magnetic stripe on the PSC.

However, the contact chip on the Public Services Card and a card reader communicate with each other by cryptographic means. Only card readers specifically programmed to accept the Public Services Card contact chip can do this. To date, no specified body has implemented that technology.

The Free Travel version of the Public Services Card also contains a contactless chip. This contactless chip allows the Free Travel variant of the Public Services Card to be used across the National Transport Authority's Integrated Ticketing System commonly known as LEAP. The application is designed to only interact with a ticketing system reader deployed by the National Transport Authority. No personal information on a customer is made available to any transport operator either inside or outside of the jurisdiction when the Public Services Card is used to interact with the ticketing system. Neither does the contactless chip interact with the contact chip.

An Post, operating as an agent for the Department of Employment Affairs and Social Protection, is the only organisation that reads the Magnetic stripe for the purposes of accessing the PPS Number. The PPS number is used by the Post Office to make welfare payments to customers in post offices.



45

IF THE PASSPORT OFFICE CURRENTLY REQUIRES A PHOTOCOPY OF THE PSC FOR THE PURPOSES OF PASSPORT PROCESSING, HOW IS THIS UTILISING THE **SECURITY FEATURES** THE CARD WAS DESIGNED WITH?

WHAT DOES THE **PASSPORT OFFICE** DO WITH THE PHOTOCOPY?

HOW DOES IT ASSIST THE PASSPORT OFFICE IN **AUTHENTICATING IDENTITY?**

The Passport Service currently requires a photocopy of the PSC for first time adult applicants and those replacing lost, stolen or damaged passports that were issued prior to 2005. A photocopy of the PSC is currently required as evidence that the applicant is SAFE 2 registered, but the Passport Service does not require nor does it utilise the security features of the card itself.

The photocopy of the PSC enables the Passport Service to authenticate an applicant's identity by verifying their details against the Single Customer View (SCV). The photocopy of the card is scanned onto the Passport Service system. The photocopy is then securely stored before being shredded in line with the Passport Service's data retention policy. This is an interim process which the Passport Service will streamline over the next two years through its Passport Reform Programme. The new Passport Application process will enable passport applicants to access its services online and verify their identity using the MyGovID solution – thereby removing the need for applicants to submit a photocopy of their PSC.

46

WHO IS RESPONSIBLE FOR IDENTITY SERVICES AND STANDARDS IN THE PUBLIC SERVICE?

The **SAFE** standard, including the PSC and MyGovID platforms, are overseen and managed by a senior level Interdepartmental Implementation and Policy Group on Public Service Identity which is co-chaired by the Department of Public Expenditure and Reform and the Department of Employment Affairs and Social Protection. This group reports to the Civil Service Management Board. All decisions are subject to Government approval, and if required, to legislative change.

47

WHAT IS THE “SINGLE CUSTOMER VIEW”?

The Single Customer View (SCV) is a read only, periodically updated, consolidated view of Public Service Identity (PSI) data only. Essentially, it is a mechanism used to enable sharing of the PSI dataset with specified bodies. The Single Customer View is held electronically on secure systems owned by the State in a secure Government Data Centre on the private Government Network in Ireland.

48

WHAT IS THE LEGAL BASIS FOR THE SHARING OF THIS DATA BY DEPARTMENTS, AGENCIES AND OFFICES WITH THE SINGLE CUSTOMER VIEW?

The Single Customer View was developed to enable sharing of PSI data in accordance with Sections 262 (5) and 262 (6) of the Social Welfare Consolidation Act 2005 (as set out in the response to Question 15). In addition, the system facilitates the sharing of PSI data for control purposes in accordance with Section 261 of the Social Welfare Consolidation Act 2005 which states –

“Information held by the Minister for the purposes of this Act or the control of schemes administered by or on behalf of the Minister or the Department of Social and Family Affairs may be transferred by the Minister to another Minister of the Government or a specified body, and information held by another Minister of the Government or a specified body which is required for those purposes or the control of any such scheme administered by another Minister of the Government or a specified body may be transferred by that Minister of the Government or the specified body to the Minister.”

49

WHAT DEPARTMENTS, AGENCIES AND OFFICES **FEED DATA** INTO THE SINGLE CUSTOMER VIEW?

The single customer view combines PSI data held by the following contributors –

- Department of Employment Affairs and Social Protection;
- Department of Agriculture, Food and the Marine;
- Department of Tourism, Transport and Sport;
- Revenue Commissioners;
- Health Service Executive (Primary Care Reimbursement Service); and
- General Register’s Office (Death Registrations).

The PSI data displayed will be that obtained by each contributor during their most recent transaction with the customer. This allows all specified bodies the opportunity to check the currency of their PSI data and a means of keeping it up to date.

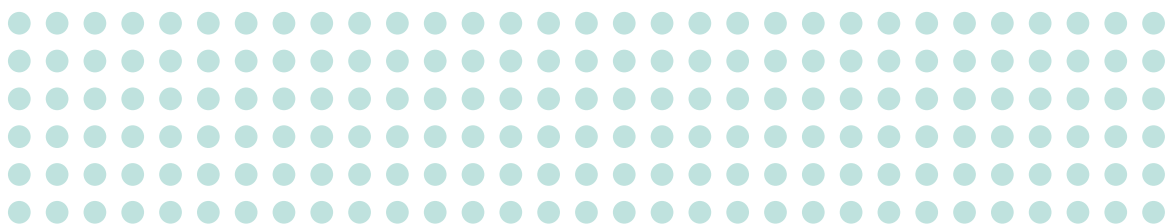
50

WHAT THIRD PARTIES HAVE ACCESS TO THE DATA IN THE SINGLE CUSTOMER VIEW (SCV)?

No 'third parties' have access to the Single Customer View. All Specified Bodies are legally entitled to access the Single Customer View.

To date, the following Specified Bodies have been granted access to various services (see Question 44 for an explanation of these) on the Single Customer View as follows –

- Department of Employment Affairs and Social Protection (PSI look-up and Control application)
- Passport office (Department of Foreign Affairs and Trade) (PSI look-up)
- Residential Tenancy Board (Control application)
- Department of Justice (section that processes Naturalisation certificates) (PSI look-up)
- Irish Prisons Service (PSI look-up)
- Road Safety Authority (PSI look-up and PSI Reporting)
- Revenue Commissioners (PSI Reporting)
- Department of Education (PSI Reporting)
- Pobal (PSI Reporting)
- NTMA (PSI Reporting)



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WHO IS THE STATE DATA CONTROLLER OF THE “SINGLE CUSTOMER VIEW”?

The Single Customer View is maintained in the Department of Public Expenditure and Reform on behalf of the Department of Employment Affairs and Social Protection. The Secretary General of the Department of Employment Affairs and Social Protection is the Data Controller.

WHAT **GOVERNANCE ARRANGEMENTS** ARE IN PLACE FOR THE SINGLE CUSTOMER VIEW?

WHAT SAFEGUARDS ARE IN PLACE FOR THE SINGLE CUSTOMER VIEW?

FOR EXAMPLE, HOW DO YOU ENSURE THAT ENTITIES PROVIDING INFORMATION TO THE **SINGLE CUSTOMER VIEW** DO NOT PROVIDE MORE INFORMATION THAT IS REQUIRED UNDER LAW. WHAT **MECHANISMS** ENSURE THAT STATE ENTITIES DO NOT HAVE ACCESS TO IRRELEVANT OR EXCESSIVE PERSONAL DATA?

The Single Customer View system supports four data services that can be accessed by Specified Bodies, *viz.*

1. PPSN Checker which allows a specified body to validate a PPSN, Name, Address and Date of Birth in real-time – it simply confirms if the data input is valid or not;
2. PSI Lookup which allows a specified body to lookup the PSI data for an individual based on PPS Number;
3. PSI Reporting which facilitates specified bodies in comparing their PSI data with that held on the system to assist them with their overall PSI data quality; and
4. Control which facilitates specified bodies to view and search all of the PSI information in the Single Customer View for control and/or fraud detection purposes.

All specified bodies can access the PPSN checker (Item 1).

However, the Department of Employment Affairs and Social Protection must formally approve access to the other three services. That approval is conditional on a business need being established and on the agreement to and implementation of rigorous data security and protection (both technical and business) protocols and standards. This includes the nomination of a Compliance Officer in the specified body who liaises with the Client Identity Services Division of the Department of Employment Affairs and Social Protection with respect to each element of the agreement. That Compliance Officer is responsible for managing the agreement, for nominating specific officers to access specific services on the Single Customer View, and for ensuring that each such officer signs an Officer User Agreement (this agreement sets out the officer's responsibilities under Social Welfare legislation in relation to the use of the PPS number/Public Service Identity Data, and the Data Protection Acts 1988 and 2003).

All accesses to the Single Customer View application are logged. Information is logged about what information was accessed, by whom, and when. The Office of the Government Chief Information Officer in the Department of Public Expenditure and Reform, the Client Identity Services Division of the Department of Employment Affairs and Social Protection and the user organisations management hierarchy can access all relevant access history on the Single Customer View.

53

IF I WISH TO MAKE AN ACCESS REQUEST TO ASCERTAIN WHAT PERSONAL DATA IS HELD ABOUT ME IN THE SINGLE CUSTOMER VIEW, TO WHOM DO I DIRECT MY REQUEST AND HOW DO YOU ENSURE THAT ANY **INACCURACIES ARE FULLY RECTIFIED?**

Subject Access requests are dealt with in accordance with the guidance of the Data Protection Commissioner (as set out at <https://www.dataprotection.ie/docs/Making-an-Access-Request/963.htm>) and should be sent to –

**Subject Access Requests,
Department of Employment Affairs and Social Protection,
Shannon Lodge,
Carrick-on-Shannon,
Co. Leitrim
N41 KD81**

The identity of the person making the request must be verified before data will be provided. The data may be provided either electronically or in paper format as preferred by the requestor.

Data on Single Customer View reflects the PSI data held on an individual by each contributor at the time of contact with the individual. If it is believed that inaccurate data is held by one of the contributing bodies, that body should be contacted to discuss any corrections.



54

THE GOVERNMENT IN 2013
COMMITTED TO A REVIEW
OF THE LEGAL BASIS OF THE
PPSN TO ENSURE IT REMAINED
ALIGNED WITH THE **WIDER
PUBLIC SERVICE?**

HAS THIS REVIEW BEEN
CONDUCTED? WHAT WAS THE
OUTCOME? WHAT ARE/WERE
THE TERMS OF REFERENCE
FOR THE REVIEW?

WHO IS COMPLETING
THE REVIEW?



At present, the PPS Number is a restricted number for use by specified bodies and their agents in the conduct of public transactions with and for the person concerned and the functions of the specified body in accordance with the provisions of Section 262 of the Social Welfare Consolidation Act 2005 (as amended). The Government decision of September 2013 provided that the Department of Social Protection would lead a research and consultation exercise on the suitability of the current legal basis for the PPS Number and the making of recommendations. This examination is to include –

1. The preparation of a paper on the experience in comparable countries, focussing in particular on the link between the restrictiveness of the legal framework and the associated levels of fraud;
2. Consideration of any categories of service for which the collection of the PPSN should not be mandatory; and
3. Consultation across a range of public service bodies, including all Departments, the Office of the Revenue Commissioners, the Office of the Data Protection Commissioner, the Central Statistics Office and the Central Bank.

The initial task of examining and preparing a comparative report with other countries' treatment of personal identity numbers, cards and eIDs in the provision of public services is underway but has not yet been completed. It is likely to be 2018 before this element of the examination will be complete. Once it is, a senior level Interdepartmental Group established by the Civil Service Management Board to oversee identity services in the public service will consider how best to progress the two other elements of the examination. In the meantime, the legislative basis referred to above maintains the PPS Number as a restricted number.

APPENDIX 1

GUIDE TO THE LEGAL PROVISIONS ASSOCIATED WITH THE PUBLIC SERVICES CARD (PSC)

(This listing is for guidance purposes only and does not purport to be a legal interpretation)



POWER	LEGISLATIVE REFERENCE	ENABLING ACT	DATE ENACTED
Minister may issue a PSC	Section 263(1) of the Social Welfare Consolidation Act, 2005	Section 14 of the Social Welfare Act 1998; carried forward into the Social Welfare Consolidation Act 2005; and substituted by Section 9(1) of the Social Welfare and Pensions Act 2010	1 April 1998; 1 December 2005 (enactment of SWCA 2005); 21 December 2010
Information to be inscribed on the PSC	Section 263 (1A) and (1B) of the Social Welfare Consolidation Act, 2005	Section 9(1) of the Social Welfare and Pensions Act 2010	21 December 2010
Minister must be satisfied as to the identity of the person before a PSC is issued	Section 263 (1C) of the Social Welfare Consolidation Act, 2005	Section 15 of the Social Welfare and Pensions Act 2012	7 June 2012
A person will be provided with the information that is encoded on his/her card within 28 days of requesting that information	Section 263 (2) of the Social Welfare Consolidation Act, 2005	Section 14(1) Social Welfare Act 1998	1 August 1998
A person is required to produce the PSC for the purposes of a transaction when asked to do so by a specified body	Section 263 (3) of the Social Welfare Consolidation Act, 2005	Section 14(1) Social Welfare Act 1998	1 August 1998

POWER	LEGISLATIVE REFERENCE	ENABLING ACT	DATE ENACTED
<p>The only people that can use the card or ask for it to be produced are (i) the holder of the PSC or a person appointed to act on his/her behalf (ii) a specified body for the purposes of a transaction and (iii) a person who has a transaction with a specified body and the personal public service number of the card is relevant to that transaction. Any other use of the card is an offence</p>	<p>Section 263 (4) of the Social Welfare Consolidation Act, 2005</p>	<p>Section 14(1) Social Welfare Act 1998</p>	<p>1 August 1998</p>
<p>Minister may cancel a PSC in certain circumstances (e.g. when the PSC is lost or stolen)</p>	<p>Section 263 A(1) of the Social Welfare Consolidation Act, 2005</p>	<p>Section 15 of the Social Welfare and Pensions Act 2011</p>	<p>29 June 2011</p>
<p>Where a card is cancelled, the Minister will explain why to the card holder</p>	<p>Section 263A (2) of the Social Welfare Consolidation Act, 2005</p>	<p>Section 15 of the Social Welfare and Pensions Act 2011</p>	<p>29 June 2011</p>
<p>Where a card is cancelled, it must be surrendered to the Minister</p>	<p>Sections 263A (3) and 263A (4) of the Social Welfare Consolidation Act, 2005</p>	<p>Section 15 of the Social Welfare and Pensions Act 2011</p>	<p>29 June 2011</p>
<p>Any person who has a PSC which is not their own must surrender it to the Minister</p>	<p>Section 263A (5) of the Social Welfare Consolidation Act, 2005</p>	<p>Section 15 of the Social Welfare and Pensions Act 2011</p>	<p>29 June 2011</p>

POWER	LEGISLATIVE REFERENCE	ENABLING ACT	DATE ENACTED
A person who refuses to surrender a PSC which is not their own, or has been cancelled, is guilty of an offence	Section 263A (6) of the Social Welfare Consolidation Act, 2005	Section 15 of the Social Welfare and Pensions Act 2011	29 June 2011
A payment service provider (for example, a post office) can confiscate a PSC and surrender it to the Minister in certain circumstances (e.g. when they are aware that the card is not being used by the owner of the card)	Section 263A (7) of the Social Welfare Consolidation Act, 2005	Section 3(e) of the Social Welfare and Pensions Act 2014.	17 July 2014
For the purposes of authenticating the identity of a person to whom a PSC is to be issued, the Minister may request the person to present themselves at a specified place, provide certain documentation, have a photograph taken and provide a signature in electronic form	Section 263B (1) of the Social Welfare Consolidation Act, 2005	Section 15 of the Social Welfare and Pensions Act 2012.	7 June 2012
The Minister will retain, in electronic form, the photograph and signature obtained under the process set out in Section 263B (1)	Section 263B (2) of the Social Welfare Consolidation Act, 2005	Section 15 of the Social Welfare and Pensions Act 2012.	7 June 2012
A condition of a person's right to a benefit is that they satisfy the Minister as to their identity	Section 241 (1) of the Social Welfare Consolidation Act, 2005	Section 15 of the Social Welfare and Pensions Act 2012.	7 June 2012

POWER	LEGISLATIVE REFERENCE	ENABLING ACT	DATE ENACTED
<p>For the purposes of authenticating the identity of a person making a claim for a social welfare payment, the Minister may request the person to present themselves at a specified place, provide certain documentation, have a photograph taken and provide a signature in electronic form</p>	<p>Section 241 (1C) of the Social Welfare Consolidation Act, 2005</p>	<p>Section 15 of the Social Welfare and Pensions Act 2012.</p>	<p>7 June 2012</p>
<p>The Minister will retain, in electronic form, the photograph and signature obtained under authentication process set out in Section 241 (1C)</p>	<p>Section 241 (1D) of the Social Welfare Consolidation Act, 2005</p>	<p>Section 15 of the Social Welfare and Pensions Act 2012.</p>	<p>7 June 2012</p>
<p>For the purposes of authenticating the identity of a person in receipt of a social welfare payment, the Minister may request the person to present themselves at a specified place, provide certain documentation, have a photograph taken and provide a signature in electronic form</p>	<p>Section 247C (3) of the Social Welfare Consolidation Act, 2005</p>	<p>Section 11 of the Social Welfare and Pensions (Miscellaneous Provisions) Act 2013.</p>	<p>28 June 2013</p>

POWER	LEGISLATIVE REFERENCE	ENABLING ACT	DATE ENACTED
The Minister will retain, in electronic form, the photograph and signature obtained under the process set out in Section 247C (3)	Section 247C (4) of the Social Welfare Consolidation Act, 2005	Section 11 of the Social Welfare and Pensions (Miscellaneous Provisions) Act 2013.	28 June 2013
The Minister is not prevented from using a different method of authentication to that set out in Section 247(C)	Section 263A (2) of the Social Welfare Consolidation Act, 2005	Section 11 of the Social Welfare and Pensions (Miscellaneous Provisions) Act 2013.	28 June 2013
A person presenting for a social welfare benefit shall furnish his/her public services card in order to satisfy the Minister as to his/her identity.	Section 242 (4) of the Social Welfare Consolidation Act, 2005	Section 9(a) of the Social Welfare (Miscellaneous Provisions) Act 2015.	6 May 2015
List of specified bodies who may use the PSC for the purposes of a transaction	Schedule 5 of the Social Welfare Consolidation Act, 2005		1 December 2005*

* Note that Schedule 5 has been amended on a number of occasions to provide for additions to the list of specified bodies or to reflect changes in the title of specified bodies.

APPENDIX 2
SCHEDULE 5 OF
THE SOCIAL WELFARE
CONSOLIDATION
ACT 2005
(AS AMENDED)



An Roinn
Gnóthaí Fostaíochta agus Coimirce Sóisialaí
Department of
Employment Affairs and Social Protection

SPECIFIED BODIES



1. Each of the following shall be a specified body for the purposes of this Schedule and sections 262 to 270:

(1)

- a Minister of the Government
- the Commission for Public Service Appointments
- the Public Appointments Service, the Revenue Commissioners

(2) a local authority (for the purposes of the Local Government Act 2001)

(2A) an education and training board

(3) the Health Service Executive

(4)

- a body established by the Minister for Education and Science under section 54 of the Education Act 1998
- a payment service provider (within the meaning of section 122(1) of the Finance (Local Property Tax) Act 2012) in relation to the purpose specified in that section of that Act
- payment service provider
- An tSeirbhís Oideachais Leanúnaigh Agus Scileanna
- An Garda Síochána and the Defence Forces in respect of their own members
- An tArd-Chláraitheoir
- An tÚdaras um Ard-Oideachas
- Central Applications Office
- Coillte Teoranta
- Companies Registration Office
- Enterprise Ireland
- Health and Social Care Professionals Council
- Irish Water
- Legal Aid Board
- Mental Health Commission
- National Breast Screening Board

- Child and Family Agency
- Quality and Qualifications Ireland
- the Central Statistics Office
- the Commission for Taxi Regulation
- the General Medical Services (Payments) Board
- the Insolvency Service of Ireland
- the National Cancer Registry Board
- the National Council for Special Education
- the National Treasury Management Agency
- the Pensions Authority
- the Pensions Ombudsman
- the Personal Injuries Assessment Board
- the Private Residential Tenancies Board
- the Private Security Authority
- the Probate Office
- the Property Services Regulatory Authority
- the Pyrite Resolution Board
- the Road Safety Authority
- the Sustainable Energy Authority of Ireland
- the Teaching Council
- the Workplace Relations Commission

(5) the following Voluntary Hospitals:

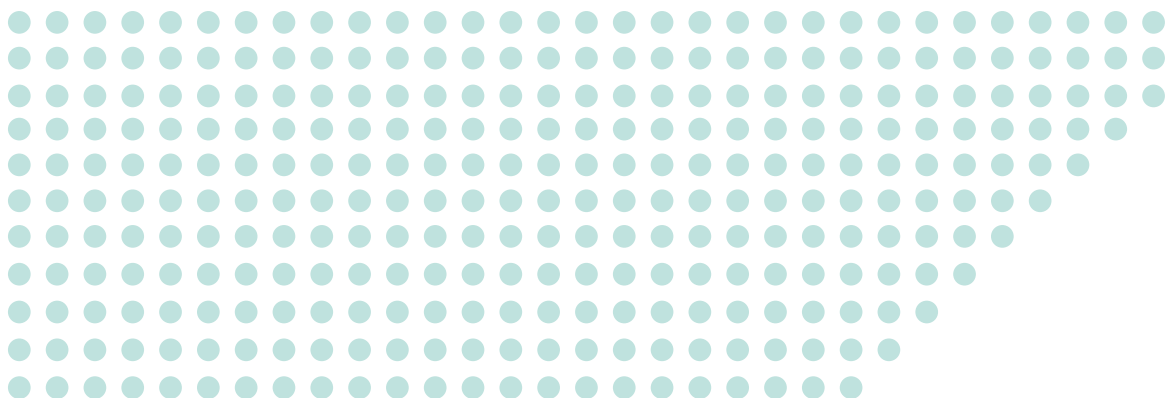
- Beaumont Hospital, Dublin
- Cappagh National Orthopaedic Hospital, Dublin
- Coombe Women’s Hospital, Dublin
- Dublin Dental Hospital
- Hume Street Hospital, Dublin
- Incorporated Orthopaedic Hospital of Ireland, Clontarf, Dublin
- Leopardstown Park Hospital
- Mater Misericordiae University Hospital, Dublin
- Mercy Hospital, Cork
- National Maternity Hospital, Dublin
- National Rehabilitation Hospital, Dun Laoghaire
- Our Lady’s Hospice, Dublin
- Our Lady’s Hospital for Sick Children, Crumlin, Dublin
- Portiuncula Hospital, Ballinasloe, Co. Galway
- Rotunda Hospital, Dublin
- Royal Victoria Eye and Ear Hospital, Dublin
- South Infirmery/Victoria Hospital, Cork
- St. James’s Hospital, Dublin
- St. John’s Hospital, Limerick
- St. Luke’s Hospital, Dublin
- St. Mary’s Hospital and Residential School, Baldoyle, Dublin
- St. Michael’s Hospital, Dun Laoghaire
- St. Vincent’s University Hospital, Elm Park, Dublin
- St. Vincent’s Hospital, Fairview, Dublin

-
- The Adelaide and Meath Hospital, Dublin incorporating the National Children's Hospital
 - The Children's Hospital, Temple Street, Dublin
 - The Royal Hospital, Donnybrook
 - University Dental School and Hospital, Cork

2. Each of the following shall be a specified body for the purposes of this Schedule and section 266:

- a person who provides, organises or procures a programme of education or training
- a recognised school or centre for education (within the meaning of section 2 of the Education Act 1998)
- a university to which the Universities Acts 1997 and 1999 apply
- an educational institution to which the Regional Technical Colleges Acts 1992 to 2001 apply

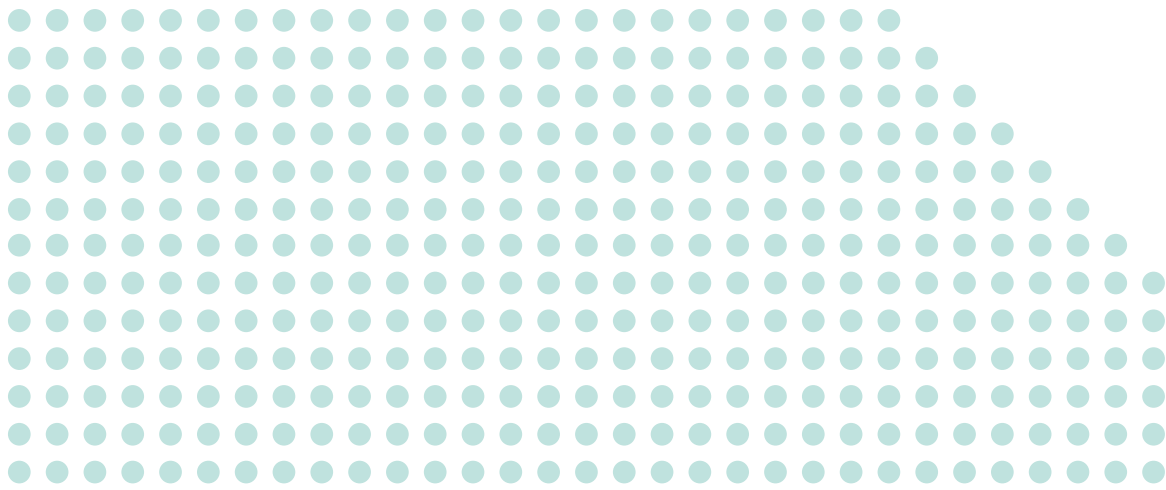
3. The Minister may by regulations amend paragraph 1 or 2 by adding a specified body to, deleting a specified body from, or amending a reference to a specified body in, those paragraphs.



APPENDIX 3

SECURITY QUESTIONS OFFERED FOR SAFE 2 REGISTRATION PROCESS





People are asked to answer only 2 of the following 10 security questions and leave the remainder blank.

People are reminded that these questions may be used to assist in confirming a person's identity when they contact the Department about their SAFE registration or their PSC so it is important that they can easily remember the responses they provided.

Questions to choose from –

1. What was your childhood nickname?
2. What was the make of your first car?
3. What was the surname of your best childhood friend?
4. What is your maternal grandmother's birth surname?
5. Where was your first holiday?
6. What is the middle name of your oldest child?
7. What primary school did you attend?
8. What is your oldest child's birth month (e.g. January)?
9. What was the location of your first employment?
10. What is your favourite sport?

APPENDIX 4
BODIES WHOM
RECEIVED THE PUBLIC
SERVICE IDENTITY
DATA FROM THE
DEPARTMENT OF
SOCIAL PROTECTION
IN 2016



This schedule lists the bodies that received the Public Service Identity data from the Department of Social Protection in 2016 along with the relevant legislative basis under which it was released.

LEGISLATIVE BASIS	DESTINATION ORGANISATION
S262 Social Welfare Consolidation Act 2005	<ul style="list-style-type: none"> • Department of Agriculture, Food & the Marine • Department of Children & Youth Affairs • Department of Education & Skills • Department of Foreign Affairs (Passport Service) • Department of Justice (Citizenship section) • Central Statistics Office • Revenue Commissioners • Tusla - Child and Family Agency • Student Universal Support Ireland • Office of the Refugee Applications Commissioner • Local Authorities • HSE • Hospitals (Specified Body Only) • Nursing Homes (HSE Run i.e., Specified Body) • National Cancer Screening • BreastCheck Agency • ColoRectal Cancer Screening • Solicitors (Legal Aid Board Scheme and Client PPSN Verification requests) etc.
Section 8 of the Health Identifiers Act 2014 (provided solely for the purpose of establishing, or maintaining the accuracy of, the National Register of Individual Health Identifiers)	<ul style="list-style-type: none"> • Department of Health/HSE (Individual Health Identifier)
Section 8d of the Data Protection Acts (required urgently to prevent injury or other damage to the health of a person or serious loss of or damage to property)	<ul style="list-style-type: none"> • Irish Blood Transfusion Service

LEGISLATIVE BASIS	DESTINATION ORGANISATION
Immigration Act 2003 S8 (for the sharing of information regarding non-nationals)	<ul style="list-style-type: none"> Irish Naturalisation and Immigration Service
S146 Residential Tenancy Act 2004 (supply of information which to the Board is reasonably necessary for the performance by the Board of its functions)	<ul style="list-style-type: none"> Residential Tenancies Board
Section 8b of the Data Protection Acts (required for the purpose of preventing, detecting or investigating offences, apprehending or prosecuting offenders or assessing or collecting any tax, duty or other moneys owed or payable to the State, a local authority or a health board, in any case in which the application of those restrictions would be likely to prejudice any of the matters aforesaid)	<ul style="list-style-type: none"> Chief State Solicitor An Garda Síochána Garda Síochána Ombudsman Commission