

Cloud Computing Policy

Ref: IC016, v1

November 2024



**An Bord Um
Chúnammh Dílíthiúil**
Legal Aid Board

Providing access to justice since 1979

Policy and Procedure Document Summary

Document Governance and Management	
Document Name	Cloud Computing Policy
Current Version	v1
Document Reference Number	IC016
Date Effective From	27th November 2024
Date Effective Until	26th November 2025
Commissioning Directorate	Information & Communications Directorate
Commissioning Unit	Knowledge & Information
Document Owner (Director)	Gareth Clifford
Document Author	Dr. Brian Moss
Document Approver (Person or Group)	Executive Management Team
Note: Formal review may occur sooner if new legislative/regulatory or emerging issues/research/technology/audit etc. dictates sooner.	

Version Control				
Version No.	Date Reviewed	Description of Change	Author	Approved by
1	27/11/2024	Full Review	Brian Moss	Gareth Clifford



1. Purpose

This Cloud Policy is the Legal Aid Board's statement governing how staff within the Legal Aid Board, design, utilise and review cloud-based IT services in the course of fulfilling their work tasks.

The use of cloud-based services is a priority of Government for effective delivery of Irish public sector services. The policy has been informed by cloud computing advice published by the Office of the Government Chief Information Officer and the Office of Government Procurement and will incorporate any future advice from those sources as necessary. Equally, in taking advantage of cloud-based services, the Board is mindful of its statutory obligations under GDPR and the Data Protection Acts 1988-2018 to ensure that all data it holds are collected for a designated purpose, retained only for as long as possible, and kept secure. The placing of personal data in the cloud presents both benefits and challenges which this policy seeks to address.

2. Scope

This policy applies to all Board staff, to all on-site, remote, or blended working arrangements and to all data held by the Board in hard or soft/ digital formats on managed ICT services operated by the Board.

The policy should be read in conjunction with all Board data protection policies. All Board data policies are available at www.legalaidboard.ie.

3. Roles and Responsibilities

IT Unit: maintains all of the Board technologies, devices and all managed databases/systems. The IT Unit is responsible for ensuring that all technological measures remain fit for purpose, offering the protections expected under GDPR, to minimise risk to the Board and to maintain the Board's standing. Any planned software or hardware purchase that is cloud-based must be explored in writing with the IT Unit ahead of its acquisition.

EMT and Directors: The Executive Management Team approves all proposals by Directors for the acquisition of tools and services they identify as necessary for their Directorate and sub-units. Every cloud-based proposal advanced by a Director must be submitted to the EMT for approval and must adhere to this policy.

Local Managers: have responsibility for ensuring compliance with GDPR in the teams that report to them.

Staff of the Legal Aid Board: all are individually responsible for reading, understanding, and complying with obligations of the GDPR and the Data Protection Act 2018, set out in this policy, and in all Board data policies in their daily work. All policies are available on www.legalaidboard.ie. Individually, staff are responsible for engaging with data protection training provided by the Board to inform themselves of data protection legislation and good practice.



All staff should consult the Data Protection section if in doubt about any aspect of this policy or aspect of their work where Board data are concerned.

Data Protection section: advises on and monitors compliance with data protection legislation, taking timely action and making recommendations to improve the Board's performance where needed. The section manages subject access requests, breaches, and conducts data protection impact assessments where needed. The section also acts as the main contact point for the Data Protection Commission, the Irish supervisory authority on data protection.

4. Definitions

Board Staff: for the purpose of this policy, Board staff are understood as those directly employed or contracted to undertake a service on the Board's behalf and given access to Board data to do this.

Cloud-based services: these are various forms of ICT services largely delivered via the internet, and also known as cloud-computing, the cloud, or cloud. Cloud-based services are deployed and delivered in different ways (e.g. private, public, etc.). Cloud-based services are understood here as meaning any ICT product, service, technical, and sales and all other support services through which such internet-based services are delivered by a contractor to the Legal Aid Board.

5. Cloud Policy

The requirements of cloud-based products, services and staff conduct are set out below.

Any cloud-based service intended for the Legal Aid Board should:

- Be informed by a DPIA in line with the Legal Aid Board DPIA Policy and completed by the relevant Director at the start of any planned move to the cloud;
- Have secured DPIA approval from the Legal Aid Board Data Protection section;
- Be guided by discussion with the IT Unit at the start of any project;
- Demonstrate consideration of effective risk management and assessment of the service over time;
- Undergo the established Legal Aid Board RFT/contract procedures for all contracted services;
- Be fit, necessary, and appropriate for the business purpose for which it is acquired;
- Be compatible with existing Legal Aid Board ICT infrastructure and accessibility requirements;
- Have a high degree of availability, be flexible to different scales, be confidential and secure in terms of the Legal Aid Board data it is intended to hold, demonstrate data integrity and data recovery functionality;
- Facilitate easy Legal Aid Board extraction from a contract where business need requires it;
- Have a proven backup and recovery plan that enables data backup/retention and recovery;
- Be subject to regular review; and
- Otherwise comply with EU GDPR and cybersecurity legislation (NIS2) and Irish data protection and cybersecurity legislation.



All staff must inform the IT Unit or Data Protection section of any conduct they observe in breach of this or the other LAB Data Protection policies.

6. Contact details

The Board's Data Protection section and Data Protection Officer can be contacted at the details below. These are also published on the Board's website www.legalaidboard.ie

Data Protection Officer
Legal Aid Board
Quay Street,
Cahirciveen
Co. Kerry
V23 RD36

Phone: (066) 947 1000

Email: dataprotection@legalaidboard.ie

7. Making a Complaint

A person dissatisfied with the Board's response to matters relating to its Cloud Computing Policy may then submit a complaint as follows:

Data Protection Commission
21 Fitzwilliam Square
Dublin 2.
D02 RD28
Ireland

Phone: 01 765 0100

Email: info@dataprotection.ie

Web: www.dataprotection.ie

8. Monitoring, Enforcement, and Alteration

Compliance with this policy will be monitored by the Data Protection section and the Executive Management Team members reporting to the Board Audit, Finance, and Risk Committee.



The Board reserves the right to take action it deems appropriate where individuals breach this policy. Board staff who breach this policy may be subject to disciplinary action. The Board reserves the right to remedy a breach of this policy by contractors, sub-contractors and commercial service providers via contracts in existence with them.

The Board will amend this policy regularly but may amend this policy at any time to take account of business, legislative, or organisational changes.

Any changes to the policy will be notified on the Board website

