An Roinn Caiteachais Phoiblí Bonneagair
Athchóiriúcháin Seirbhíse Poiblí agus Digitiúcháin
Department of Public Expenditure Infrastructure
Public Service Reform and Digitalisation

Data Governance Board Recommendations

NTANSAI 027_250326

SPSV Licence Data

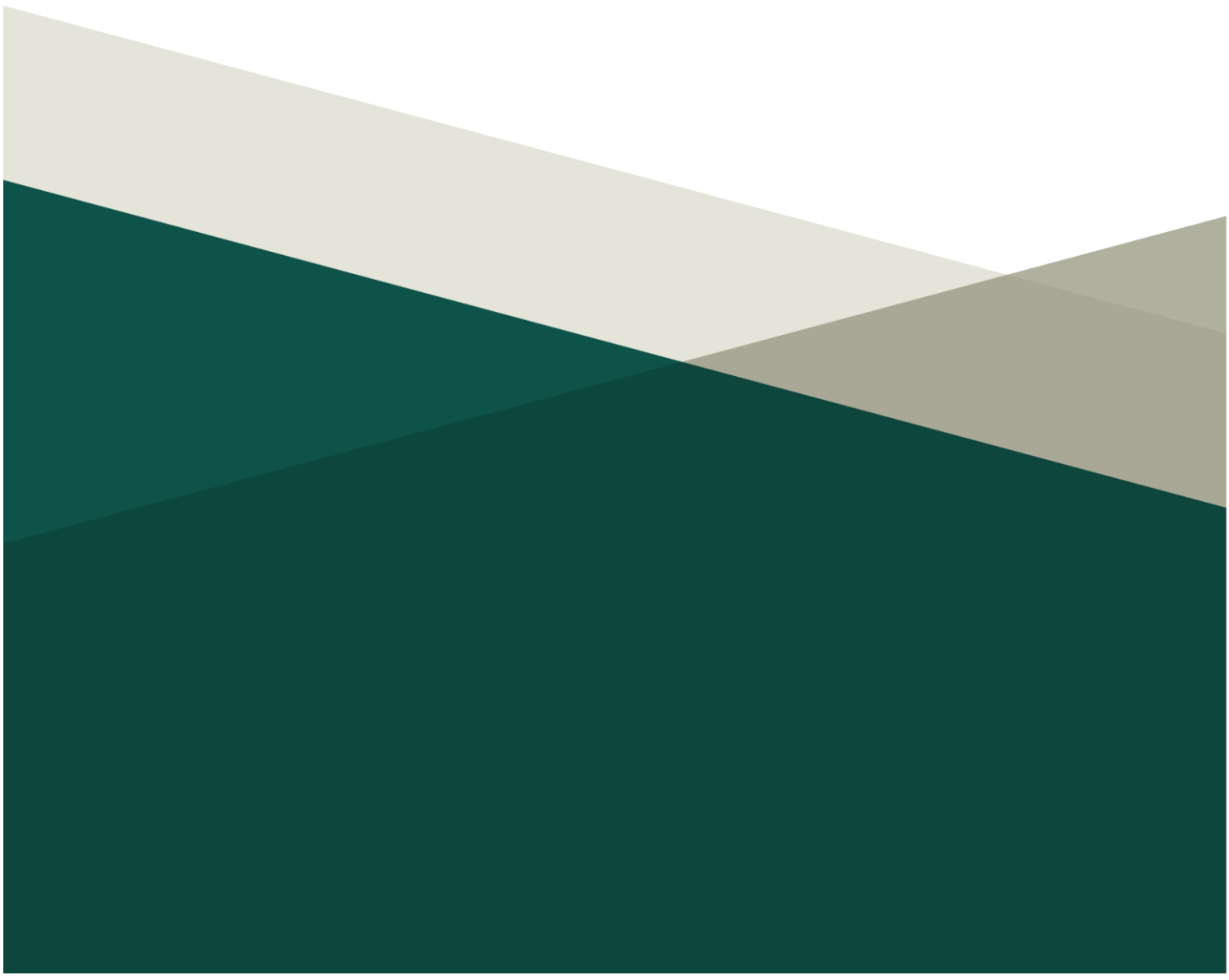
Data Governance Board Recommendations

The Data Sharing and Governance Act 2019 (the Act) sets out that the Data Governance Board must review and, where appropriate; make recommendations on data sharing agreements submitted under the Act.

The Data Governance Board make the following recommendations in relation to this Data Sharing Agreement:

DSA Name	SPSV Licence Data
DSA Register Reference	NTANSAI 027_250326
Public Bodies	1. National Transport Authority 2. National Standards Authority of Ireland Legal Metrology Service
Date of Report	26th June 2025

Data Governance Board Recommendations	
Advice	The Data Governance Board has reviewed this Data Sharing Agreement and submissions and found no substantive issues. The Board highlighted the transparency brought about by the notification to special interest groups, including all data subjects, about public consultation. Noting the complexity of the data journey the Board advises a more simplified description of processing. To improve transparency and understanding of data sharing, plain English should be used throughout the agreement. Included in this is use of the term 'taxi' rather than SPSV, where appropriate. The Data Governance Board recommends the following issues are addressed:

1.	• Title Page The NSAI appears to be a legal entity even if line 3 suggests it is not. National Standards Authority of Ireland Legal Metrology Service “NSAI LMS”, “NSAI” and “LMS” is not a legal entity, suggest the suitable title is National Standards Authority of Ireland. Only this title should be used as the receiving body throughout the agreement.
2.	• Table 2.2 Performance of a Function Given the complexity of the bidirectional flow of data and the element of compliance checking, an additional purpose should be selected that reflects the legal basis for the data sharing. Suggesting: ‘V’ To facilitate the administration, supervision and control of a service, programme or policy delivered or implemented or being delivered or implemented, as the case may be, by, for or on behalf of one or more of the public bodies mentioned Or ‘VII’ To enable the evaluation, oversight or review of a service, programme or policy delivered or implemented or being delivered or implemented, as the case may be, by, for or on behalf of one or more of the public bodies mentioned. Follow up description of additional purpose(s) should be added to Table 2.3 - Details about Purpose. Table 2.3 Details about the Purpose Page 11. Also, for consistency, any reference to a bidirectional data journey should clearly reflected when used throughout the agreement and not just in one place. Overall, the language describing why the data sharing is required should be simplified. It should note the function is to ensure taxis are metered correctly which is ultimately to the benefit of users.

3.	• Table 5.1.2 Appropriate Legislative Provisions for Further Processing On page 16, processing of SPSV personal data is for the purpose of administering a fixed penalty notice and/or prosecution. Processing of personal data for the purposes of prevention, detection, investigation, and prosecution of criminal offenses falls under the scope of Law Enforcement Directive (LED) and outside of both GDPR and the purposes listed the Data Sharing and Governance Act (DSGA). As further processing of SPSV licence data for administrating fines and prosecutions is outside of scope for the DSGA, any references of this purpose under LED shall be removed within the agreement. • On page 17, the description of the controller-controller relationship is more appropriate in Table 9.2 Description of Processing. In addition, this description should be fully described, aligned with the law and reflect the relationship after the data has been shared.
4.	• Table 9.2 Description of Processing Lots of terms and system names used. A plain English review of overall DSA simplifying content to improve public understanding is needed.
5.	• Table 12 Duration of Retention In relation to the NTA data imported into the LMS system, NTA should clarify how long the data is retained after the SPSV licence has expired and how it is deleted.