Your group: Joint submission from the BC and IPC

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| **Issue** | **Line number(s)** | **Cannot live with rationale** | **Proposed changes** |
|  | Rec #3 – Contents of RequestsLine 775 | The use of the phrase “at a minimum” is problematic as it will allow disclosers (contracted parties) to deny/reject a request simply by asserting they require information that is not specified in the existing list. To ensure we meet our principle of predictability we must not allow a situation where a request is denied if additional information not described in this section (and by policy) is required. We note however that some information specified in other sections of this policy is missing and should be added. Including 1) the ability to indicate the urgency of a request and 2) to allow LEA to indicate that the request should not be disclosed to the registrant. (There may be others….) | Strike “at a minimum”“The EPDP Team recommends that each SSAD request must include~~, at a minimum,~~ the following information:” |
|  | Rec #5 – Ack. Of ReceiptLine 812 | A 2-hour SLA for acknowledgement of receipt of a request is unacceptable. Remember that we are assuming the use of modern web services/web protocols/web servers/etc. In that environment a web client will typically time out after 120 seconds - long before the 2-hour mark hits. (As a thought exercise try to Imagine the last time you submitted a form on a web page and had to wait up to two hours for a response.) Note that this recommendation applies to the Central Gateway, not the Contracted Party (i.e. the authorizer/discloser)This recommendation also is in conflict with the Automation Recommendation # 16 which states "The SSAD must allow for the automation of an immediate and synchronous response that indicates the receipt of a valid request and some indication that it will be processed. "    | The wording in Rec #5 should reference (or be consistent with the language in Rec 16. (line 988) e.g. “….by the Central Gateway Manager must be without undue delay and result in an immediate and synchronous response that indicates the receipt of a valid request and some indication that it will be processed. (cf. Recommendation #16 line 988).” ~~not more than two (2) hours from receipt.~~ |
|  | Rec #8 – Response Requirements Line 1010 | The requirement to respond to denied requests with a rational should not be optional. | Update line 1009-1010 as follows1. “e) Responses where disclosure of data (in whole or in part) has been denied ~~should~~ MUST include: rationale sufficient…”
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|  | Rec #17 – LoggingLine 1438 | In order to ensure transparency, an additional logging requirement is necessary to support the analysis and measurement of data associated with disclosure responses. This will aid and support the continuous evolution of the SSAD over time.  | Add the following bullet to the list of EPDP recommendations : f) Periodic reports of log data should be published in aggregate and without PII to enable an assessment of disclosure request responses on a per contract party basis.   [We note this may be better suited as an addition in the Auditing section – specifically the “Audits of the Central Gateway Manager & Contracted Parties” Section]  |