infoshare-2020-06-08 notes

Notes from Code of Conduct InfoShare

34 attendees

slides

Q&A:

GDPR is a law – what does the CoCo add?

- GDPR gives extra powers to an approved code of conduct (see slide 5)

Monitoring Body – what should it do and can GÉANT do it?

- a 3-tier model has been planned for GEANT CoCo:
    - Level 1: CoCo monitor that makes automated technical checks to eduGAIN metadata
    - Level 2: Regular self assessments carried out by the SP administrators, potentially with an online tool
    - Level 3: Ability to lodge a complaint to the monitoring body
- Outcome of a monitoring failure would be loss of the CoCo tag

What would be the timescale?

- We can only give estimates
- For "option 1": Non-international could be submitted in Autumn 2020. Likely to take a year or so to pass through Dutch DPA and EDPB.
- For "option 2": International transfers could take a few years, we don't know when EDPB will publish the guidelines for international transfers.

What about the non-EU if we go ahead with "option 1"?

- Can we have a best practice for non-EU and approved "official" for EU?
- Yes but only approved codes provide appropriate safeguards for international transfers

Can we put pressure to move faster?

- Unlikely unless this comes from the EC.

Summary of the prefered options, from people that expressed their opinion during the infoshare:

- Option 1 was preferred one for four persons.
- On the question by Nicole if people felt that "option 1" should not be taken, nobody came forward.

Comments from the chat:

10:22:42   From *** : Question: any idea when those guidelines will become available ?

10:23:56   From *** : Did your answer got an answer?

10:24:16   From *** : kind of :)

10:25:14   From *** : I think a CoCo *with* a blessing from the official authorities would really add some value. So stopping is not a good idea IMO.

10:25:30   From *** : I agree with *** on this

10:25:54   From *** : +1

10:26:16   From ***: Since a lot of work has already been done and it's unclear when those guidelines would become available, I would be in favour of option 1. It's really unfortunate for all non-EU SPs :(

10:26:46   From ***: Option 3: 'publish the current CoCo t' =that is the updated version isn't it?

10:26:56   From ***: I would also opt to proceed with the blessing of the official authorities. So option 1

10:27:39   From ***: Option 2 could take long

10:27:41   From ***: Question: any idea what a monitoring body should actually do? Is GEANT up for that task?

10:31:09   From ***: thanks :)

10:31:17   From ***: Also think Option 1 is the best. If there is a committment to update the new version as soon as guidelines etc. are ready, option 1 is not worse for Non-EU SPs than option 2...

10:35:03   From ***: Is there any direct effects of applying option 1 on non EU members?

10:36:30   From ***: I guess independent entities (approved by the monitoring body) should be able to perform compliance audits, to give a level of trust to this attachment

10:37:02   From ***: Could CoCo v1 and v2 co-exist for this interim period?

10:37:35   From ***: Was thinking about that too

10:41:49   From ***: UKf has a few Eps with code-of-conduct & there's no guarantee we'll have data adequacy agreement post-brexit

10:44:58   From ***: Thank you for the good presentation!

10:45:26   From ***: Excellent presentation - very clear, thanks !

10:45:37   From ***: Thanks all

10:45:37   From ***: Thanks Mikael and Nicole

10:45:39   From ***: Thank you, very interesting!

10:45:39   From ***: Thanks!

10:45:41   From ***: Thanks!

10:45:44   From ***: Thank you!

10:45:44   From ***: Thanks all