



LEADER IT System User Policy



Rialtas
na hÉireann
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Tionscaldal Éireann
Project Ireland
2040

Ár dTodhchaí
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LEADER IT System

User Policy

To be completed by each nominated user in the Local Action Group/Financial Partner and Implementing Partner and returned to Pobal at leadersystem@pobal.ie. A copy of the policy should also be held on file in the event of an inspection or audit.

1. Who does this policy apply to?

The LEADER IT System - User Policy applies to Local Action Group (LAG)/Financial Partner (FP) and Implementing Partner (IP) staff who are nominated users of the LEADER IT System. Nominated LAG/FP and IP staff have access to the CRM system including its SharePoint folders in the execution of their functions as per the terms of the funding agreement. Use of the LEADER system is restricted to licence holders who are nominated via the user mandate process. Violation of these policies could result in disciplinary and/or legal action against the LAG/FP or IP. Each individual user is required to acknowledge receipt and confirm that they have understood and agree to abide by the rules hereunder by completing the declaration in Section 7.

2. About the LEADER IT System

The LEADER IT System is a customised online CRM application that must be utilised by those administering the LEADER programme in each LAG/FP and IP. The development and roll-out of the ICT system is being undertaken on a phased basis over 2016 and 2017.

3. Accessing the LEADER IT System

3.1 System Requirements

The LEADER IT System is accessed via the internet. It is recommended that Internet Explorer 10 or 11 be utilised. It is the responsibility of LAGs/FPs and IPs to ensure that they have the necessary software installed to ensure optimum utilisation of the system. Neither the Department of Rural and Community Development nor Pobal is responsible for advising on hardware, software and broadband connectivity. A firewall allowing for standard web port 80 (or 443 if using IFD) is required. Pobal will keep users informed of any system upgrades, enhancements or changes as they are implemented and will provide supporting information to assist users in using the system.

3.2 Licencing

A limited number of licences will be awarded to LAG/FP and IP staff for the purpose of programme implementation and administration as specified in the funding agreement. Users will be limited to one user account relevant to their work requirements and based upon job function. The only exceptions are (1) in the case of IPs working with multiple LAGs where the users will have separate accounts pertaining to each LAG they are associated with and (2) LAG Users and Managers (within LCDC LAGs) who are also involved in the Article 48 checking process and will have one account for their normal LAG duties and a second account for their Article 48 duties.

3.2.1 User Account Setup

The Department of Rural and Community Development will advise Pobal on the standard number of user accounts for the specific user roles within each LAG/FP and IP (roles are defined in Section 5 of this policy). All system users are nominated by the contracted LAG/FP or IP who completes a user mandate form and submits to Pobal (onlinesupport@pobal.ie). Pobal is responsible for setting up the user accounts, and communicating the username and password directly to each system user via an email addressed to that individual user and sent to their specific email account.

3.2.2 User Account Changes

Any subsequent changes to users of the system must be advised to Pobal (onlinesupport@pobal.ie) by the relevant LAG/FP or IP via the completion of a 'Change to User' mandate form. This form is provided by Pobal upon request and is to be used in instances where a member of staff is to be removed and/or where one staff member is being replaced by another.

It is imperative that LAGs/FPs and IPs inform Pobal (onlinesupport@pobal.ie) without delay when a registered user leaves the organisation or ceases to have a role that is relevant to the LEADER IT System, so that their account is disabled and access removed. The onus is on LAGs and IPs respectively to ensure that their staff access rights are up-to-date and relevant to the system at all times.

3.3 Usernames and Passwords

All access to the LEADER IT System is via a username and password combination supplied directly to each user by Pobal, the system administrators. This username and password provides verification of the user's identity and defines their access level to the system. Access levels will be set at the minimum rights necessary for the user to fulfil their business responsibilities as determined by their role.

Each username and password combination is intended for use only by the person to whom it is issued and must not be used by anyone else. Each transaction carried out on the system is traceable back to the individual user via their log-in credentials and provides an audit trail of activity.

Usernames and passwords are the main protection against unauthorised access to the system and should never be revealed to anyone, not even to close colleagues. Sharing of usernames and passwords is not permitted. Revealing a username and password permits others to act on your behalf without your knowledge or consent and could result in unauthorised access to the LEADER IT System. Any known or suspected compromise of a login username or password must be reported to the Department Data Controller (dataprotectionunit@drcd.gov.ie) immediately. It should be borne in mind that the audit trail will always lead any investigation back to the person assigned the username/password. If an individual knows of your username and password, you could be held accountable for any actions the individual undertakes while using these credentials.

4. Data Confidentiality, Data Protection & Data Security

4.1 Confidentiality

Any data accessed via the LEADER IT System must be treated as confidential, and not disclosed to anyone unless in an official capacity.

4.2 Data Protection

All users are reminded of their obligations under both EU General Data Protection Regulation (the “GDPR”) and the Irish Data Protection Acts. As detailed in the LEADER Operating Rules (section 14.8), LAGs (this includes both FPs and IPs) are classified as **data controllers** in the LEADER programme. Data controllers are the legal entities responsible for the acquisition, processing and use of personal data. Where applicable, the LAG must also ensure that its IPs and FPs are compliant with data protection legislation.

The Department of Rural and Community Development as the Programme Manager for LEADER is also a data controller and the owner of the LEADER IT System, which is made available for use by the other data controllers (the LAGs/FPs and their associated IPs). Please refer to the relevant circulars from the Department of Rural and Community Development for further information in relation to Data Protection.

The LEADER IT System is hosted on the Pobal network and Pobal is a data processor. Pobal’s external third party software provider is a data processor also, but in the context of system development and support only. Pobal and the external IT provider, like the data controllers, have a responsibility to keep personal data secure from unauthorised access, disclosure, destruction or accidental loss.

4.3 Data Security

Pobal systems are secure and system security is proactively monitored, in line with best practice guidelines. Access to the system is via a username and password supplied directly to each user by Pobal.

Pobal has in place a number of security policies that address security requirements for users who remotely access systems that are hosted on the Pobal network. These include an access control policy, a remote access policy and a passwords standards policy. In addition, penetration tests are carried out on all externally facing systems annually, to ensure that they meet appropriate standards. These tests are undertaken by an independent 3rd party ICT company.

In addition, Pobal carry out a comprehensive suite of backups on all systems and have the necessary disaster recovery measures in place. Details of these backups are contained in the *Pobal Business Continuity Plan* documentation.

Pobal has a Data Protection Breach Management policy in place. This policy contains details of Pobal’s Data Protection responsibilities and the process that is followed by Pobal in the event of a data breach.

5. LEADER User Groups & Security Role

Access to the LEADER IT System is via the following user roles¹ and is granted in line with the requirements of the specific role. Further details are provided in the system User Guides.

Local Authority User Roles		
User Role	Monthly Returns	Projects Project Claims
LFP Article 48 Manager	N/A – no access to the Monthly Returns functionality	<p>A user within the Local Authority/LCDC LAG responsible for signing off the Article 48 checks on project applications and payment claims² in their own LDS area (i.e. LCDC flag), with the exception of in-house projects and claims (i.e. projects delivered directly by the LAG or IP).</p> <ul style="list-style-type: none"> • Can sign off Article 48 checks for all LCDC-flagged projects at Stages 09 and 14 in their own LDS area. • Can progress all LCDC-flagged projects to Stages 10 and 15 in their own LDS area. • Can sign off Article 48 checks on all LCDC-flagged claims at Stage 06 in their own LDS area. • Can progress all LCDC-flagged claims to Stage 07 in their own LDS area • Can view Project Promoters in their own LDS area • Has access rights to documents for any projects or claims in their own LDS area
LFP Article 48 User	N/A – no access to the Monthly Returns functionality	<p>A user within the Local Authority/LCDC LAG responsible for performing the Article 48 checks on project applications and payment claims in their own LDS area (i.e. LCDC flag), with the exception of in-house projects and claims (i.e. projects delivered directly by the LAG or IP)</p> <ul style="list-style-type: none"> • Can perform Article 48 checks for all LCDC-flagged projects at Stages 08 and 13 in their own LDS area. • Can progress all LCDC-flagged projects to Stages 09 and 14 in their own LDS area. • Can perform Article 48 checks on all LCDC-flagged claims at Stage 05 in their own LDS area. • Can progress all LCDC-flagged claims to Stage 06 in their own LDS rea • Can view Project Promoters • Has access rights to documents for any projects or claims in their own LDS area

¹ User roles are accurate at December 2018. Additional user roles may be created (as required by the Department) as part of any future phases of ICT system development.

LAG/FP User Roles

User Role	Monthly Returns	Projects Project Claims
LAG Manager	<p>A user within the LAG/FP who reviews and approves its own Monthly Return information on the system.</p> <ul style="list-style-type: none"> • Read-only access to own LDS and LAG record and any associated IP record • Has access rights to the LDS Document Library folder • Can review and approve the completed Monthly Return (LAG/FP expenditure, and where relevant IP expenditure) • Can move the Stage on whereby the Monthly Return is submitted to Pobal for the Article 48 check, before it is forwarded to the Department • Has access rights to the Monthly Return Document Library 'main folder' which contains a subfolder of supporting documentation per associated IP (where relevant) as well as their own sub-folder of LAG supporting documentation 	<p>A user within the LAG/FP who reviews and approves its own Project & Project Claim information on the system.</p> <ul style="list-style-type: none"> • Can review and approve the LAG Project (on the system) and any associated IP Project, at the Application Stage • Can view Project Promoters • Can move a Project on to the Stage that the Project is submitted to Pobal for Article 48 checks • Can review and approve the LAG/FP, and any associated IP, Project Claim • Has access rights to the Project & Project Claim Document Library 'main folder' which contains a subfolder of supporting documentation per associated IP (where relevant) as well as their own sub-folder of LAG supporting documentation.
LAG User	<p>A user within the LAG/FP who enters its own Monthly Return data on the system but does not have approval rights.</p> <ul style="list-style-type: none"> • Read-only access to own LDS and LAG record and any associated IP record • Has access to the LDS Document Library folder • Can record LAG/FP administration and animation expenditure on the Monthly Return • Can complete the LAG/FP checklist relating to the LAG/FP expenditure • Can review the completed IP administration and animation expenditure and IP checklist (where there are associated IPs) • Can move Monthly Return on certain Stages • Has access rights to the Monthly Return Document Library 'main folder' which contains a subfolder of supporting documentation per associated IP (where relevant) as well as their own sub-folder of LAG supporting documentation 	<p>A user within the LAG/FP who enters its own Project & Project Claim data on the system.</p> <ul style="list-style-type: none"> • Can input basic Expression of Interest (EOI) information for projects (Phase 1) • Can record LAG Projects & Promoters & move the Project on certain Stages • Can create Project Claims on the LAG/FP Project record & move the Claim on certain Stages • Has access rights to the Project & Project Claim Document Library 'main folder' which contains a subfolder of supporting documentation for the associated IP (where relevant) as well as the sub-folder of LAG supporting documentation.
LAG Project User	<p>N/A – no access to the following: LAG record; LDS record; any associated IP record; Monthly Returns functionality; LDS and Monthly Return folder in the Document Library.</p>	<p>A user within the LAG/FP who enters its own Project & Project Claim data on the system.</p> <ul style="list-style-type: none"> • Can input basic EOI information for projects (Phase 1) • Can record LAG Projects & Promoters & move the Project on certain Stages • Can create Project Claims on the LAG/FP Project record & move the Claim on certain Stages • Has access to the Project & Project Claim sub-folder within the LAG Document Library, which contains the LAGs/FPs supporting documentation (no access to the IP Document Libraries)

IP User Roles

User Role	Monthly Returns	Projects Project Claims
IP Manager	<p>A user within the IP organisation who reviews and approves its own IP Monthly Return information on the system.</p> <ul style="list-style-type: none"> • Read-only access to own LDS record and IP record • No access to the LDS Document Library folder • Can review and approve its own IP Monthly Return expenditure and the supporting documentation uploaded, as well as the IP checklist responses input by the IP User, before this is submitted to the LAG/FP • Has access to the Monthly Return Document Library sub-folder within the main folder that relates to their respective IP (only), into which their own IP supporting documents will be uploaded 	<p>A user within the IP organisation who reviews and approves its own IP Project & Project Claim information on the system.</p> <ul style="list-style-type: none"> • Can review and approve its own IP Projects & Project Claims and the supporting documentation uploaded, as well as the IP checklist responses input by the IP User • Can view Project Promoters • Has access to the Project & Project Claim Document Library sub-folder within the main folder that relates to their respective IP (only), into which their IP supporting documents will be uploaded
IP User	<p>A user within the IP organisation who enters its own IP Monthly Return data on the system but does not have approval rights.</p> <ul style="list-style-type: none"> • Read-only access to own LDS record and IP record • No access to the LDS Document Library folder • Can record IP administration and animation expenditure on the Monthly Return • Can upload documentation in support of the reported expenditure • Can complete the IP checklist relating to the IP expenditure • Has access to the Monthly Return Document Library sub-folder within the main folder that relates to their respective IP (only), into which their own IP supporting documents will be uploaded 	<p>A user within the Implementing Partner (IP) organisation who enters its own IP Project & Project Claim data on the system.</p> <ul style="list-style-type: none"> • Can input basic EOI information for projects (in Phase 1) • Can record IP Projects & Promoters & move the Project on certain Stages • Can create Project Claims on the IP Projects & move the Claim on certain Stages • Has access rights to the IP Project & Project Claim Document Library, which contains the IPs own supporting documentation.
IP Project User	<p>N/A – no access to the following: IP record; LDS record; Monthly Returns functionality; LDS and Monthly Return folder in the Document Library.</p>	<p>A new user role within the IP who enters its own IP Project & Project Claim data on the system.</p> <ul style="list-style-type: none"> • Can record IP Projects & Promoters & move the Project on certain Stages • Can create Claims on the IP Projects & move the Claim on certain Stages • Has access rights to the IP Project & Project Claim Document Library, which contains the IPs own supporting documentation

Department User Roles

User Role	Monthly Returns	Projects Project Claims
Department Manager	Department Manager with read-only access to Monthly Returns. <ul style="list-style-type: none"> Read-only access to all LDS, LAG and IP records and the LDS Document Library Read-only access to Monthly Returns for all LAGs/FPs and IPs, including the Monthly Return Document Library 	Department Manager who is responsible for ultimately approving all LAG & IP Project Claims. <ul style="list-style-type: none"> Read-only access to Projects, Promoters and Project Claims for all LAGs/FPs and IPs, including all supporting documentation uploaded to the Project & Project Claim Document Library Approves all Project Claims and moves onto the Payment stage
Department User	Department User who is responsible for the processing and approval of all Monthly Returns. <ul style="list-style-type: none"> Read-only access to all LDS, LAG and IP records and the LDS Document Library Read-only access to Monthly Returns for all LAGs/FPs and IPs, including the Monthly Return Document Library Monthly Return: Completes a Department Checklist, approves & records payment details against each Monthly Return 	Department User who is responsible for the review of all LAG & IP Project Claims and payment details. <ul style="list-style-type: none"> Read-only access to Projects, Promoters and Project Claims for all LAGs/FPs and IPs Completes a Department Checklist, reviews & records payment details against each Project Claim Can view/contribute to the Project and Project Claim Document Library

Inspectorate User Roles

User Role	Monthly Returns	Projects Project Claims
Inspectorate Manager	Inspectorate Manager with read-only access to Monthly Returns. <ul style="list-style-type: none"> Read-only access to all LDS, LAG and IP records, and to Monthly Returns for all LAGs/FPs and IPs, including the Monthly Return Document Library 	Inspectorate Manager who is responsible for reviewing selected LAG & IP Project Claims. <ul style="list-style-type: none"> Read-only access to all Projects and Promoters Reviews Project Claims at the Optional Inspectorate Stage & can move a Project Claim Stage forward/back as per Stage Transition Has Bulk Edit permissions Can view/contribute to the Project and Project Claim Document Library
Inspectorate User	Inspectorate User with read-only access to Monthly Returns. <ul style="list-style-type: none"> Read-only access to all LDS, LAG and IP records, and to Monthly Returns for all LAGs/FPs and IPs, including the Monthly Return Document Library 	Inspectorate User who is responsible for reviewing selected LAG & IP Project Claims. <ul style="list-style-type: none"> Read-only access to all Projects and Promoters Reviews Project Claims at the Optional Inspectorate Stage & can move a Project Claim Stage forward/back as per Stage Transition Can view/contribute to the Project and Project Claim Document Library

Pobal User Roles

User Role	Monthly Returns	Projects Project Claims
Pobal Article 48 Manager	<p>Pobal staff member who is responsible for verifying all Monthly Return Article 48 checks.</p> <ul style="list-style-type: none"> • Read-only access to all LDS, LAG and IP records • Read-only access to Monthly Returns and expenditure details for all LAGs/FPs and IPs, including all supporting documentation uploaded • Has access to the LDS and Monthly Return Document Library for all LAGs/FPs and IPs • Verifies the Article 48 checklist on the system Moves the Monthly Return to the Article 48 Verified stage 	<p>Pobal staff member who is responsible for signing off Article 48 checks with Pobal flag i.e. on: (1) project applications and payment claims for all LDC LAGs; (2) any in-house projects and claims for LCDC LAGs (where the LAG or IP is the promoter who will deliver the project).</p> <ul style="list-style-type: none"> • Can sign off Article 48 checks for all Pobal-flagged projects at Stages 09 and 14 in any LDS area. • Can progress all Pobal-flagged projects to Stages 10 and 15 in any LDS area. • Can sign off Article 48 checks on all Pobal-flagged claims at Stage 06 in any LDS area. • Can progress all Pobal-flagged claims to Stage 07 in any LDS area • Can view Project Promoters in any LDS area • Has access rights to documents for any projects or claims in any LDS area
Pobal Article 48 User	<p>Pobal staff member who is responsible for executing all Monthly Return Article 48 checks.</p> <ul style="list-style-type: none"> • Read-only access to the LDS, LAG and IP record • Read-only access to Monthly Returns and expenditure details for all LAGs/FPs and IPs, including all supporting documentation uploaded • Has access to the LDS and Monthly Return Document Library for all LAGs and IPs • Completes the Article 48 checklist on all Monthly Returns • Moves all Monthly Returns from Stage 4 (Approved by LAG Manager) to Stage 5 (Article 48 check in progress) 	<p>Pobal staff member who is responsible for performing Article 48 checks with Pobal flag i.e. on: (1) project applications and payment claims for all LDC LAGs; (2) any in-house projects and claims for LCDC LAGs (where the LAG or IP is the promoter who will deliver the project).</p> <ul style="list-style-type: none"> • Can perform Article 48 checks for all LDC LAG and In-House IP & LCDC LAG projects at Stages 08 and 13 in any LDS Area. • Can progress all LDC LAG and In-House IP & LCDC LAG projects to Stages 09 and 14 in any LDS Area. • Can perform Article 48 checks on all LDC LAG and In-House IP & LCDC LAG claims at Stage 05 in any LDS Area. • Can progress all LDC LAG and In-House IP & LCDC LAG claims to Stage 06 in any LDS Area • Can view Project Promoters in any LDS Area • Has access rights to documents for any projects or claims in any LDS Area

<p>Pobal Read-Only User</p>	<p>Pobal staff member with Read-only access to all entities and attributes in the system.</p> <ul style="list-style-type: none"> • Read-only access to all LDS, LAG and IP records • Has access rights to all LDS Document Library folders • Read-only access to Monthly Returns for all LAGs/FPs and IPs • No access to the Monthly Return Document Library for any LAG or IP • Can export results of filters/searches 	<p>Pobal staff member with Read-only access to all entities and attributes in the system.</p> <ul style="list-style-type: none"> • Ready-only access to all Promoters, Projects & Project Claims recorded on the system • No access to the Project and Project Claim Document Library • Can export results of filters/searches
<p>LEADER System Administrator</p>	<p>Pobal staff member fulfilling the LEADER System Administrator role.</p> <ul style="list-style-type: none"> • Full access to the system including Document Libraries, for the purpose of trouble-shooting, training and providing ongoing support to all users. • Maintains User Accounts (access and permissions), sets up the LAG/FP, IP and LDS record • Creates Monthly Returns and document folders for all organisations • Can edit all entity data and all static data 	<p>Pobal staff member fulfilling the Leader System Administrator role.</p> <ul style="list-style-type: none"> • Has full access to all Projects, Promoters and Project Claims records, including Document Libraries • Can edit all entity data and all static data
<p>External 3rd Party Software Developer</p>	<p>External System Administrator</p> <ul style="list-style-type: none"> • On request/approval by Pobal - Full access to all LDS, LAG/FP, IP & Monthly Return data on the system to carry out necessary technical support and maintenance, including Document Libraries • Access is secure and available only to those with authority when required 	<p>External System Administrator</p> <ul style="list-style-type: none"> • On request/approval by Pobal - Full access to all LAG/FP & IP Project & Claim data on the system to carry out necessary technical support and maintenance, including Document Libraries • Access is secure and available only to those with authority when required

6. Proper Use of Licences

The LEADER IT System should be used and updated on an ongoing basis by LAGs/FPs and IPs for:

- Completing the Monthly Returns (Phase 1) and
- Completing Project Records and submitting Project Claims (Phase 2).

Where it is evident that the ICT System is not being utilised by licence holders, Pobal has the right to remove that licence, based on instruction from the Department of Rural and Community Development. Reasons for removal of a licence include, but are not limited to, the following:

- Clear demonstration that the system has not been accessed by that user for a period greater than 12 weeks (exceptions may be made in cases such as sick leave, extended annual holidays etc.). Such decisions are at the discretion of the Department. It is the responsibility of LAGs/FPs and IPs to ensure that their administrative obligations can be met in such cases.
- When Pobal deems that the user has displayed poor ability at utilising the system.
- When a user is found to be no longer in the employment of the LAG/FP or IP or is on special leave such as maternity leave/long term illness leave. In such cases the LAG/FP or IP must notify Pobal immediately to ensure that access is restricted forthwith. The licence can be reassigned to other nominated members/staff in such cases via the user mandate process.
- Unacceptable use of the LEADER IT System but not limited to:
 - Stealing, using, or disclosing someone else's password without authorisation.
 - Downloading, copying or utilising data for use outside of programme business.
 - Introducing malicious software onto the company network and/or jeopardising the security of the LEADER IT System.
 - Any threat to system security and data protection.
 - Sending or posting chain letters, solicitations, or advertisements not related to activities pertaining to the LEADER Programme.

In cases where a user licence has been revoked, requests for account reactivation must be made in the first instance to Pobal online support at: onlinesupport@pobal.ie.

7. User Compliance

I understand and will abide by the LEADER IT System Usage Policy and am aware of my obligations to ensure that I treat the data contained in the system with confidence.

I am also aware of my obligations as set out in my employer's data protection policy.

I further understand that should I commit any violation of this policy, my access privileges may be revoked, disciplinary action and/or appropriate legal action may be taken against my employer by the Department Rural and Community Development or Pobal.

Licensee Name (Print):	
Licensee Signature:	
Organisation:	
Date:	

**Please sign and scan this entire User Policy and return to
leadersystem@pobal.ie
Thank you**