Mr Barry Lowry,

Government Chief Information Officer,

Office of the Government Chief Information Officer,

3A Mayor Street,

Spencer Dock,

Dublin 1.

Ireland.

16th November 2018

Technology Ireland submission to the public consultation on "Considering Cloud Services" policy document

Dear Mr Lowry,

Technology Ireland welcomes the opportunity to submit its views to Submission to the the Office of the Government Chief Information Officer at the Department of Public Expenditure and Reform as part of its public consultation on the "Considering Cloud Services" policy document.

About Technology Ireland:

Technology Ireland is an Association within Ibec, which represents the ICT, Digital and Software Technology Sector. The Association is a pro-active membership organisation with over 200-member companies located throughout Ireland. We advocate on behalf of Ireland's indigenous and foreign direct investment (FDI) technology companies to Government and policy makers. We welcome the

opportunity to deliver this submission to the Office of the Government Chief Information Officer (OGCIO) at the Department of Public Expenditure and Reform.

Technology Ireland
84/86 Lower Baggot Street
Dublin 2
Ireland

Making Ireland a global
technology powerhouse

tel: + 353 1 605 1500
fax: + 353 1 638 1500
email: info@technology-ireland.ie
web: www.technology-ireland.ie

Summary of Technology Ireland Position:

Technology Ireland is supportive of all efforts to enable the Public Service use ICT to operate in a more efficient, shared and integrated manner across all of Government. The advice note: "Considering Cloud Services" was a very useful addition to those efforts, but it now needs to be updated or entirely replaced to reflect a more proactive and dynamic approach. There are several issues, which must be considered given the rapid rate of change in the development of cloud services. It is crucial also that consideration is given to the human element both in terms of comprehensive training required by public service staff for successful adoption of cloud services, and also the need to encourage businesses and the general public to make use of on-line public services. To meet these requirements, Technology Ireland would like to see the following key points taking into consideration for the revision of "Considering Cloud Services".

Key Points:

1. **"Cloud First Policy"**

Government should commit to a "Cloud First Policy" similar to those already in operation in the United Kingdom and New Zealand. This would see potential Cloud Solutions being considered first before any other options. Departments and public bodies would remain free to choose an alternative to the cloud but would have to justify it by demonstrating better value for money or a compelling security reason why the cloud should not be used. Any security reason for not choosing a cloud solution would have to involve the processing or storage of top secret information. The "Cloud First Policy" should be mandatory for government departments and strongly recommended for other public bodies.

2. "**Uniform Data Classification Model"**

Technology Ireland believes the advice note should include a Uniform Data Classification Model similar to the three-tier models in the United Kingdom and the USA. Under these models data is arranged as
Unclassified, Official, or Secret and above. The current advice note: "Considering Cloud Services" does include a clear guide in Appendix C regarding "Top Secret" material but a mandatory model uniformly

applied across government would remove some of the confusion or uncertainty, which can act as a barrier to adoption of Cloud solutions.

3. Increased Productivity

Public cloud offers improved efficiency and productivity since government agencies can improve server utilisation as well as productivity benefits in application development, management, and networks.

4. Speed & Agility of Operations

Public cloud delivers Increased operational speed and agility. New IT resources can be realised almost immediately, reducing delivery times from weeks or even months to just minutes. This results in a dramatic increase in agility for government agencies, since the cost and time it takes to experiment and develop is significantly lower.

5. Increased Range of Services

The use of Public cloud services affords access to greater service breadth and depth, since Public cloud computing allows governments to access industry-shaping technology quickly, at an affordable cost, irrespective of the scale. Cloud services will also facilitate the extension of new innovative services, which would not have been possible with an on-premise structure.

6. Reduced Costs

Similarly, by using public cloud computing technology, governments can realise cost reduction achieved via a lower variable cost because usage is aggregated in the cloud, which translates into lower, "pay-as-you-go" prices. In short public cloud provides economies of scale, which are not possible using a private cloud model.

7. Continuity in a Crisis

Using public cloud services means that government can avail of enhanced operational continuity and business recovery. With centralised data storage, management, and backups, data retrieval and business recovery during times of crisis (e.g., natural disasters or other disruptive events) become faster, easier, and more cost effective.

8. Greater Security of Data

Storing data and operating services from the public cloud can offer real, tangible security advantages over keeping data on-premises, since consumers of public cloud services benefit from economies of scale that result from the significant investments that service providers make in their hyperscale platforms that are effectively unachievable for smaller entities.

9. Procurement of Cloud Services

A clear, competition-friendly procurement system is required. 'Considering Cloud Services' does not go into the practical detail required by public sector bodies to procure cloud. For public bodies to successfully adopt cloud this must be made clear.

10. Stimulating Business and Driving Innovation

Public cloud services should not be limited to further digitisation and digitalisation, which will improve services to the general public and business. Public cloud should also facilitate an overall digital transformation, which could open up the provision of new services and support Ireland's progress as a smart society.

11. Training Requirements and Cultural Shift

It is essential that public staff and management receive comprehensive training in the introduction and use of cloud services. A lack of proper training can cause knowledge management systems to fall apart and the end result may be less efficient. Emphasise should be placed also on the cultural shift
that may be required to move managers away from a silo mentality, which is an antithesis of the mindset required for successful introduction of public cloud services.

12. Increased Cloud Awareness for General Public

The general public and small businesses must be encouraged to engage with online services if the full fruits of public cloud services are to be delivered. At present only 200,000 people in Ireland have signed up for MygovID.

Conclusion: Technology Ireland believes that widespread adoption of public cloud services is an integral part of Ireland's development as a smart society. Previously the focus was on providing advice to government bodies and public organisations on how to implement cloud services. A much more proactive approach is now required, which should see public cloud services as the norm. Strong Government direction, taking into account the points listed in this submission, is essential for this transition to occur successfully.