# Department for Communities DPIA Template

This template follows the process set out in the ICO's DPIA guidance, and should be read alongside that guidance and the Criteria for an acceptable DPIA set out in European guidelines on DPIAs.

You should start to fill out the template at the start of any major project involving the use of personal data, or if you are making a significant change to an existing process. The final outcomes should be integrated back into your project plan.

Please complete using plain English, with a non-specialist audience in mind. Any technical terms or acronyms used should be fully explained.

| Reference Number | DPIA2026-137 |
|---|---|

## Screening Assessment

This section of the DPIA is intended to help decide whether a full DPIA is necessary. Answering 'yes' to any of these questions is an indication that a DPIA would be a useful exercise. You can expand on your answers as the project develops if you need to.

| Provide a brief description of the aim of the exercise and the type of personal information which will be processed |
|---|
| The Active Ageing Strategy Action Plan sets out the Northern Ireland Executive's commitment to ensuring that all older people can participate as equal members of our society.<br><br>The Active Ageing Strategy & Action Plan's vision is for: **"That Northern Ireland becomes a truly Age-Friendly society in which people, as they grow older, are valued and supported to live actively to their fullest potential; with their rights respected and their dignity protected."**<br><br>The Executive agreed on the 21st October that the draft Active Ageing Strategy Action Plan could go forward for public consultation. For the first time there is an integrated framework across Government which will ensure targeting actions and funding together to make a real and lasting difference to older people's lives.<br><br>As DfC are responsible for the development and progression of the strategy on behalf of the Executive, Minister Lyons has directed us to take this matter forward as quickly as possible by carrying out a full public consultation. The aim of the consultation is to seek evidence to inform further on the development of the Action Plan by inviting fresh insights and perspectives. |

| Provide a brief description of the aim of the exercise and the type of personal information which will be processed |
| --- |
| Respondents are under no obligation to provide any personal details to this consultation. References to the privacy notice and were to obtain a copy (including where to locate details on the privacy, confidentiality and access to the consultation responses) will be included in the consultation documents.<br><br>We will publish a summary of the consultation responses and, in some cases, the responses themselves but these will not contain any personal data. The survey will contain free text fields, while there is no requirement for respondents to provide personal/sensitive data the survey will include instructions that respondents should not include any information that could directly or indirectly identify themselves or another individual. If personal/sensitive information is provided it will be deleted. We will not publish the names or contact details of respondents (as these will not be collected as part of the process) but will include the names of organisations responding.<br>The lawful basis we are relying on to process any personal data is Article 6(1)(e) of the UK GDPR, which allows us to process personal data when this is necessary for the performance of our public tasks in our capacity as a Government Department.<br><br>While aggregated and statistical information may be shared with third parties, there will be no intention to share personal information with any third parties Any specific requests from a third party for us to share personal data with them will be dealt with in accordance the provisions of the data protection/freedom of information laws as appropriate.<br><br>Data from the online survey will be collected and stored on Citizen Space, which is the accredited NICS recommended online consultation and survey tool that will be used to host the survey. The data collected will be analysed and compiled into a report by the Analytics Division Staff. Only designated staff will have access to the survey responses recorded and stored on Citizen Space. Any complied reports will be stored in secure containers on the Content Manager Database, again with only designated staff having access. Data will be held for 7 years before consideration for disposal in line with standard retention/disposal schedule for DfC documentation.<br><br>The Citizen Space survey will be set up and managed by Analytics Division. The only personal information being processed will be IP addresses collected passively (however consideration is being given to turning off IP address collection within Citizen space for this work) by participation in the consultation. These addresses will be deleted on closure of the consultation and will not be used anywhere else and throughout the consultation will not be accessible to anyone outside of the AD survey team.<br><br>A dedicated consultation mailbox (agefriendly.consultation@communities-ni.gov.uk) will be set up and only members of the Active Ageing Strategy team and Analytics Division will have access for any email responses to the consultation. This data will be locked down and |

| Provide a brief description of the aim of the exercise and the type of personal information which will be processed |
| --- |
| only accessible to the above teams. Data will be stored in line to the above teams and will be stored in line with standard retention disposal requirements (7 years).<br><br>Some data from consultation responses may be shared with other Departments in relation to their area of responsibility as this is an Executive Strategy. However, in the event of this information being shared, we will ensure responses are anonymised and no identifiable personal data will be shared. |

Answer each of the questions below. If you answer 'yes' to any of them that may indicate that a full DPIA is required. Where you have answered 'yes' please provide additional detail in the space provided to assist in the initial assessment of the project.

| | |
|---|---|
| 1 | Will the project involve the collection of new information about individuals? |
| No | Those responding to the consultation will be asked to respond to the draft Active Ageing Strategy Action Plan. It will not contain requests for personal data. |
| 2 | Will the project compel individuals to provide information about themselves? |
| No | This consultation will not compel any individuals to provide any personal information about themselves. |
| 3 | Will information about individuals be disclosed to organisations or people who have not previously had routine access to the information? |
| No | No |
| 4 | Are you using information about individuals for a purpose it is not currently used for, or in a way it is not currently used? |
| No | No |
| 5 | Does the project involve you using new technology which might be perceived as being privacy intrusive? For example, the use of biometrics or facial recognition. |
| No | No |
| 6 | Will the project result in you making decisions or taking action against individuals in ways which can have a significant impact on them? |
| No | No |
| 7 | Is the information about individuals of a kind particularly likely to raise privacy concerns or expectations? For example, health records, criminal records or other information that people would consider to be particularly private. |
| No | No |
| 8 | Will the project require you to contact individuals in ways which they may find intrusive? |
| No | No |

## IAO / DPO Screening Assessment Decision

| Business area | I consider that a full DPIA is ~~required~~/not required | Date |
|---|---|---|
| Active Ageing Strategy Action Plan | Ciaran Cunningham | XX October 2026 |
| Information Asset Owner | I consider that a full DPIA is ~~required~~/not required | Date |
| Christo McConnell | Christo McConnell | XX October 2026 |

| Data Protection Officer | I agree that a full DPIA is not required | Date |
|---|---|---|
| Karen McMullan | Gordon McIlmoyle obo DPO | 29/10/2026 |

| Reason why DPO considers a full DPIA is required |
|---|
| |

## Step 1: Identify the need for a DPIA

| Explain broadly what the project aims to achieve and what type of processing it involves. You may find it helpful to refer or link to other documents, such as a project proposal. What is it you want to achieve / intended benefits to individuals and to the Department. |
| --- |
| |
| Summarise why you identified the need for a DPIA. |
| |

| Does the project involve any other organisation external to DFC? If so detail those organisations below. | |
|---|---|
| Yes / No | |
| Identify each partner's role below | |
| Controller | |
| Joint Controller | |
| External Processor | |
| Crown Processor | |

| Which Lawful Basis Applies to this Project (select each which apply) | |
|---|---|
| Article 6(1)(a) Consent of the data subject | |
| Article 6(1)(b) Performance of a contract at the data subject's request | |
| Article 6(1)(c) Compliance with a legal obligation | |
| Article 6(1)(d) Vital Interests of the data subject | |
| Article 6(1)(e) Performance of a public task with a basis in law | |
| Article 6(1)(f) Legitimate interests | |

| If relying on Article 6(1)(c) or Article 6(1)(e) provide detail of the domestic law which is relevant to this project |
|---|
| |

| If relying on Article 6(1)(f) confirm below that you have completed a Legitimate Interests Assessment (LIA) and have attached a copy of it to this DPIA |
|---|
| |

| If you have indicated that the project will involve processing special category data identify below the Article 9 condition which applies to this activity | |
|---|---|
| Article 9(2)(a) Explicit consent of the data subject | |
| Article 9(2)(b) Obligations of the Department in relation to employment, social security or social protection with a basis in law | |
| Article 9(2)(c) The vital interests of the data subject or another person | |
| Article 9(2)(d) Processing for a not for profit body | |
| Article 9(2)(e) Personal data made manifestly public by the data subject | |
| Article 9(2)(f) Establishment, exercise or defence of legal rights or the courts acting in their judicial capacity | |

| If you have indicated that the project will involve processing special category data identify below the Article 9 condition which applies to this activity | |
|---|---|
| Article 9(2)(g) Reasons of substantial public interest with a basis in domestic law | |
| Article 9(2)(h) For the purpose of preventative or occupational medicine | |
| Article 9(2)(i) For reasons of public health including cross border threats to health | |
| Article 9(2)(j) Archiving in the public interest | |

| If relying on Article 9(2)(b) or Article 9(2)(g) provide detail of the domestic law which is relevant to this processing |
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| If relying on Article 6(1)(b), Article 6(1)(h), Article 6(1)(i) or Article 6(1)(j) identify below the condition in Part 1 of Schedule 1 of the DPA18 is relevant to this processing | |
|---|---|
| Employment, social security and social protection | |
| Health or social care purposes | |
| Public health | |
| Research etc | |

| If relying on Article Article 9(2)(g) provide detail of the 'substantial public interest' condition which is relevant to this processing | |
|---|---|
| Statutory and government purposes | |
| Administration of justice and parliamentary purposes | |
| Equality of opportunity or treatment | |
| Racial and ethnic diversity at senior levels | |
| Preventing or detecting unlawful acts | |
| Protecting the public | |
| Regulatory requirements | |
| Journalism, academia, art and literature | |
| Preventing fraud | |
| Suspicion of terrorist financing or money laundering | |
| Support for individuals with a particular disability or medical condition | |
| Counselling | |
| Safeguarding of children and individuals at risk | |
| Safeguarding of economic well-being of certain individuals | |
| Insurance | |
| Occupational pensions | |

| If relying on Article Article 9(2)(g) provide detail of the 'substantial public interest' condition which is relevant to this processing | |
|---|---|
| Political parties | |
| Elected representatives responding to requests | |
| Disclosure to elected representatives | |
| Informing elected representatives about prisoners | |
| Publication of legal judgments | |
| Anti-doping in sport | |
| Standards of behaviour in sport | |

## Step 2: Describe the processing

| How will you collect, use, store and delete data? | |
|---|---|
| Collect Data | |
| Use Data | |
| Store Data | |
| Delete Data | |
| What is the source of the data e.g. from the data subject; provided by a partner organisation? | |
| | |
| Will you be sharing data with anyone? | |
| Yes / No | *If yes with who?* |
| If sharing personal data describe the data flow below | |
| | |
| Does the project involve any processing identified as likely high risk? | |
| Yes / No | *If yes detail the high risk processing* |

| What is the nature of the data e.g. name, address, dob etc? |
|---|
| |
| If processing special category or criminal offence data describe the type and nature of the data below |
| |
| How much personal data will you process i.e. how many individual data subjects will be affected |
| |
| How often will the data be processed. |
| |

| What is the nature of the data e.g. name, address, dob etc? |
| --- |
| How long will the data be retained and is it subject to a departmentally approved retention period? |
| |
| What geographical area is covered by the project? |
| |

| Will the project involve any international transfers of personal data? If so what safeguards are in place to ensure the security of the data in transit and when outside the UK? | |
| --- | --- |
| Yes / No | |

## Step 3: Consultation process

| | |
|---|---|
| Will you seek the opinion of individual data subjects? Provide the reason for your decision. | |
| Yes / No | |
| Detail below the other Departmental areas you have consulted in relation to this project and confirm their advice has been incorporated into this DPIA | |
| Departmental Security | |
| IT Security Officer | |
| Data Protection Officer | |
| Others (please specify) | |
| Will this project involve a processor to carry out services on behalf of the Department? If yes-Is the processor in place or is it to be appointed? Please complete the relevant section. | |
| Yes / No | |
| External Processor (current) | *Confirm the processor is subject to a written legally binding contract which addresses its responsibilities to manage personal data in compliance with DFC instruction and data protection legislation* |
| External Processor (to be appointed) | *Confirm that the processor will be subject to a legally binding written contract which clearly describes their responsibilities to manage personal data in compliance with DFC instruction and data protection legislation* |
| Crown Processor (current) | *Confirm the Crown Processor is subject to a written agreement which addresses its responsibilities to manage personal data in compliance with DFC instruction and data protection legislation* |
| Crown Processor (to be appointed) | *Confirm the Crown Processor will be subject to a written agreement which addresses its responsibilities to manage personal data in compliance with DFC instruction and data protection legislation* |

## Step 4: Assess necessity and proportionality

| |
|---|
| Describe how the project will achieve the purpose of this project and any other options considered- nature of relationship with individual/ their level of control/ vulnerable groups? Is it novel in any way? Any current issues of public concern or security flaws to flag? Approved code of conduct or certification? |
| |
| Identify the steps you have implemented to avoid 'function creep' i.e. the temptation to use information outside the specified purpose of this project |
| |
| What considerations have you taken to ensure you process the minimum personal data required for this project? |
| |
| How will you ensure the quality of the personal data processed during this project i.e. ensure it is accurate and up to date? |
| |
| What information will you give individuals i.e. will they be provided with a privacy notice? Provide detail below on how you decided on your approach |

| | |
|---|---|
| DFC Privacy Notice | |
| Bespoke Notice | |
| Not Required | |

| What method will in place to support individuals to exercise their rights e.g. right of access, right to object etc? | |
|---|---|
| Normal DFC Provision | |
| Bespoke Arrangements | |

## Step 5: Security

| | Information Security Assessment Considerations | Confirmed Yes/No |
|---|---|---|
| a) | Please confirm that any information being shared is the absolute minimum amount of information required to achieve the business objective. | |
| b) | Please confirm that any sharing of data by email will adhere to the DfC Information Transfer Guidance | |
| c) | Please confirm if you are using a system or service provided by NICS/IT Assist, that your IAO has been provided with assurance that the system is accredited, and that it is suitable for the purpose of your processing. | |
| d) | Please confirm if this relates to a new DfC system which DfC are responsible for Accrediting that the Departments IT Security Manager has been consulted and the system has been added to the Departments Accreditation Programme. | |
| e) | Please confirm that if you are using a system or service provided by DWP your IAO has been provided with assurance that the system is owned and accredited by DWP via their Continual Risk Assessment process, that any NI element is included within the scope of the DWP assessment, that it is subject to a process of ongoing security review/accreditation and the accreditation and review take account of Department for Communities requirements. If DfC has separate requirements which sit outside DWP's scope, how will these be managed (see section f) below? | |

| f) | If using a system or service provided by DWP please detail how any DfC separate requirements which sit outside DWP's scope will be managed? |
|---|---|
| | |

| g) | Please confirm below the number of personal identifiers (eg, name, dob, nino etc) and the number of customers involved in the data share. |
|---|---|
| Number of Identifiers | Number of Customers |
| | |

| h) | Please confirm who the data will be shared with, including any sub processors of the data. |
|---|---|
| | |

| i) | Please confirm and give detail if any shared data is to be processed outside the UK. |
|---|---|
| | |

| k) | Please confirm when any data shared will be destroyed, and what technical measures will be used to destroy the data |
|---|---|
| | |

| l) | If data is to be shared into the DfC technical estate, please detail what protective measures are in place (as an example: to mitigate against malware coming in by email)? |
|---|---|
| | |

| Departmental Security Unit response: |
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| |

## Step 6: Identify and assess risks

| **Describe source of risk and nature of potential impact on individuals.** Include associated compliance and corporate risks as necessary. | **Likelihood of harm** | **Severity of harm** | **Overall risk** |
|---|---|---|---|
| | Remote, possible or probable | Minimal, significant or severe | Low, medium or high |

## Step 7: Identify measures to reduce risk

| **Identify additional measures you could take to reduce or eliminate risks identified as medium or high risk in step 5** | | | | |
|---|---|---|---|---|
| **Risk** | **Options to reduce or eliminate risk** | **Effect on risk** | **Residual risk** | **Measure approved by business area** |
| | | Eliminated reduced accepted | Low medium high | Yes/no |

## Step 7: Sign off and record outcomes

| Item | Name/date | Notes |
|---|---|---|
| Measures approved by IAO: | | Integrate actions back into project plan, with date and responsibility for completion |
| Residual risks approved by IAO: | | If accepting any residual high risk, consult the ICO before going ahead |
| DPO advice provided: | | DPO should advise on compliance, step 6 measures and whether processing can proceed |
| Summary of DPO advice: | | |
| DPO advice accepted or overruled by IAO: | | If overruled, you must explain your reasons |
| Comments: | | |
| Consultation responses reviewed by: | | If your decision departs from individuals' views, you must explain your reasons |
| Comments: | | |

| Item | Name/date | Notes |
|---|---|---|
| This DPIA will kept under review by: | | The DPO should also review ongoing compliance with DPIA |