Template for
DoF DATA PROTECTION IMPACT ASSESSMENT
SCREENING EXERCISE

Please refer to DPIA guidance before completing this exercise

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Project Name:

Consultation on Scheme Yield / Member Contributions and associated Amendment Regulations that amend the provisions of The Public Service (Civil Servants and Others) Pensions Regulations (Northern Ireland) 2014.

Business Area: DoF, NICS HR, Pensions Division	Branch: Civil Service Pensions Policy, Legislation and Communications

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1. PROJECT SUMMARY

Briefly describe your project, plan or proposal. Set out its purpose and any projected benefits.

Plans to adjust the rates of member pension contributions through a set of Amendment Regulations to amend the provisions of The Public Service (Civil Servants and Others) Pensions Regulations (Northern Ireland) 2014 and establish the rates of employee contributions for the alpha pension scheme to take effect from 1 July 2025. Adjustments to the employee contribution rates are required in order to achieve the required scheme yield and address the current shortfall.

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2. STAKEHOLDERS

Identify your data subjects and also the main stakeholders or bodies involved and their role in the project.

Trade Unions, Political Reps, Equality Consultees, employers and scheme members

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3. BRIEF DESCRIPTION OF PERSONAL DATA INVOLVED

The making of these amendment regulations and associated consultation exercise do not involve accessing, processing or sharing any personal member data.

Generic anonymised data and statistics were analysed by Government Actuary's Department and the Department of Finance and were sourced from scheme data and other information in the public domain such as NISRA published data and NICS Salary Scales etc.

4. PRIVACY ASSESSMENT

Use this checklist to assess the project for privacy risks. The questions below will help you consider whether a DPIA is necessary.

(i) Does the project/activity involve any of the following high risk processing?	Yes	No	If yes, explain your response
Systematic or extensive profiling, evaluation or scoring	☐	☒	
Large scale processing of sensitive data	☐	☒	
Systematic monitoring of individuals	☐	☒	
Use of new technology or novel use of existing technology (e.g. AI)	☐	☒	
Denial of individuals' access to a service	☐	☒	
Profiling of individuals on a large scale	☐	☒	
Processing of biometric data	☐	☒	
Processing of genetic data	☐	☒	
Processing of sensitive data or data of a highly personal nature	☐	☒	
Combining, comparing or matching data obtained from multiple sources	☐	☒	
Invisible processing	☐	☒	
Tracking geolocation or behaviour	☐	☒	
Targeting of children or other vulnerable individuals	☐	☒	
Risk of physical harm	☐	☒	

If you answer yes to any of the questions in section 4(i) above, it is likely that a DPIA will be automatically required. Consult to DoF Data Protection Officer for further advice.

(ii) Does the project involve any of the following?	Yes	No	If yes, explain your response

Automated decision-making with a legal or similar significant effect.	☐	☒	
Processing of data on a large scale.	☐	☒	
A change to an existing policy, process or system that involves personal data (e.g. new legislation or policy that makes it compulsory to collect or disclose information).	☐	☒	
A change in location of a business area or branch (e.g. plans to centralise a service or an office move).	☐	☒	
A practice or activity that is listed on a risk register (e.g. activities listed on your business area's risk register or health and safety register).	☐	☒	
Collecting new information about an individual (e.g. gathering information about individuals' location).	☐	☒	
A new way of gathering personal information (e.g. collecting information online rather than on paper forms).	☐	☒	
A change in the way personal information is stored or secured (e.g. cloud storage).	☐	☒	
A change to how sensitive personal information is managed (e.g. moving health records to a new database).	☐	☒	
Transferring personal information offshore (e.g. using a cloud based application to store data).	☐	☒	
A decision to retain personal information for longer than previously kept (e.g. keeping information for 10 years when you previously only held it for 7).	☐	☒	
Using information classed as 'special category data' (e.g. information about an individual's health).	☐	☒	
Using personal data already held for a new purpose (e.g. to obtain customer profiles).	☐	☒	

Disclosing information to a third party (e.g. following a request from a law enforcement agency to provide information for a particular purpose).	☐	☒	
Sharing or matching personal information held by different organisations or in different datasets (e.g. combining data with other information held on systems or sharing information to enable organisations to provide services jointly).	☐	☒	
A change in policy that results in people having less access to information that you hold about them (for example, archiving documents after 6 months into a facility from which they cannot be easily retrieved).	☐	☒	
Establishing a new way of identifying individuals (for example, a unique identifier, a biometric, or online identity system).	☐	☒	
Introducing a new system for searching individuals' property, persons or premises (e.g. adopting a new policy of searching data on mobile phones that have been returned for upgrading).	☐	☒	
Surveillance, tracking or monitoring of movements, behaviour or communications (e.g. installing a new CCTV system or monitoring a member of staff's email account).	☐	☒	
Changes to premises impacting on private spaces where clients/staff may discuss personal data (e.g. changing the location of a reception desk where people may disclose personal details or relocating a branch where sensitive personal data is processed).	☐	☒	

New regulatory requirements that could lead to compliance action against individuals on the basis of information about them (e.g. *adding a new medical condition to the requirements of a licence.*	☐	☒	
Other privacy intrusions such as body searches, or intrusion into physical space.	☐	☒	

Additional Comments/Notes

5. INITIAL RISK ASSESSMENT

If you answered 'Yes' to any of the questions in section 4, use the table below to give a rating - either Low (L), Medium (M), or High (H) – to each of the aspects of the project set out in the first column. If you answered 'No' to all the questions in section 4, move on to section 6.

Aspect of the Project	Rating (L, M or H)	
Level of personal data handling	L – Minimal personal information will be handled	☐
	M – A moderate amount of personal information (or information that could become personal information) will be handled	☐
	H – A significant amount of personal information (or information that could become personal information) will be handled	☐
Sensitivity of information	L – The information is not sensitive	☐
	M – The information may be considered to be, or may become, sensitive	☐
	H – The information is highly sensitive	☐
Significance of the changes	L – Only minor change to existing functions/activities	☐
	M – Substantial change to existing functions/activities; or a new initiative	☐
	H – Major overhaul of existing functions/activities; or a new initiative that's significantly different	☐
Interaction with third parties	L – No interaction with other agencies	☐
	M – Interaction with one or two other agencies	☐
	H – Extensive cross-agency (government) interaction or cross-sectional (non-government and government) interaction	☐
Public impact	L – Minimal impact on the organisation and individuals	☐
	M – Some impact on individuals is likely due to changes to the handling of personal information; or the changes may raise public concern	☐
	H – High impact on individuals and the wider public; concerns over aspects of project or negative media interest is likely.	☐

6. SUMMARY OF PRIVACY IMPACT

The privacy impact for this project has been assessed as:

Low – There is little or no personal information involved; or the use of personal information is uncontroversial; or the risk of harm eventuating is negligible; or the change is minor and something that the individuals concerned would expect; or risks are fully mitigated.	☒
Medium* – Some personal information is involved, and several low to medium risks have been identified	☐
High* – Sensitive personal information is involved, and several medium to high risks have been identified	☐
Reduced risk – The project will lessen existing privacy risks	☐
Inadequate information – More information and analysis is needed to fully assess the privacy impact of the project.	☐

Briefly summarise reasons for the rating given

The consultation exercise and subsequent amendments to the regulations will have no bearing on our data subjects and how their personal data is processed/stored etc.

* If you have assessed the privacy impact as medium or high, a DPIA must be carried out.

7. RECOMMENDATION

A full data protection impact assessment **is** required	☐
A full data protection impact assessment **is not** required	☒

Reasons

The adjustments to member contributions and associated amendments to the regulations will have no bearing on how members' personal data is processed/stored etc.
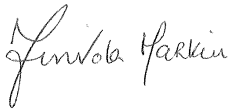
8. SIGN OFF

Project Manager

Name:	Date:
Finvola Harkin	11 November 2024

Signed:

Senior Responsible Owner/Information Asset Owner

Name:	Date:
Jonathan Butler	09/01/2025

Signed: