

DoH DATA PROTECTION IMPACT ASSESSMENT SCREENING EXERCISE

Please read chapter 4 of accompanying guidance before completing this exercise

Project Name:

Northern Ireland Fostering Services Minimum Standards

Business Area:

**Family and Children's Policy
Directorate**

Branch:

**Looked After Children and Adoption
Policy Unit**

1. PROJECT SUMMARY

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

The proposed new Minimum Standards (MS), together with the Foster Placement and Fostering Agencies Regulations (Northern Ireland) 2025 (the 2025 Regulations) relevant to the placement of children in foster care will form the basis of the new regulatory framework for the conduct of fostering services. Regulations set out what fostering service providers must do in terms of recording information such as the name, age, sex, prior address etc of each foster child. The Minimum Standards gives indicators of how fostering service providers can accomplish this.

It is intended that the Minimum Standards will be used, both by fostering service providers and by the Regulation and Quality Improvement Authority (RQIA), to focus on securing positive welfare, health, and education outcomes for children, and reducing risks to their welfare and safety.

The Minimum Standards will set a benchmark of quality care, which will bring fostering service providers within the scope of inspection and regulation by the RQIA. This will ensure that all fostering service providers are adhering to a coherent and robust policy framework and operating in the best interests of children in foster placements with foster parents. Fostering service providers will be required to register with the RQIA and the fostering service will be inspected or assessed by the RQIA. These Minimum Standards apply to all fostering service providers registered with RQIA as a fostering agency under the 2025 regulations and will also be used by RQIA in assessing the quality of Health and Social Care Trusts' fostering services.

2. STAKEHOLDERS

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

The main data subjects are:

- Prospective foster parents
- Looked after child whose personal data may need to be shared with the foster service provider and foster parent
- Birth parents whose personal data may need to be shared with fostering service provider and foster parent
- Fostering Services staff

Main stakeholders are the HSC Trusts and Independent Fostering Agencies as the bodies responsible for ensuring relevant checks and data is held securely for the required retention period.

3. BRIEF DESCRIPTION OF PERSONAL DATA INVOLVED

The Foster Placement and Fostering Agencies Regulations (Northern Ireland) 2025 will replace and revoke the existing Foster Placement (Children) Regulations (Northern Ireland) 1996. The 1996 Regulations already provide a statutory basis for the collection and retention of some personal data; the 2025 Regulations will expand this statutory basis further, providing more details on what must be recorded and shared. The Minimum Standards are designed to complement the 2025 Regulations but do not themselves introduce requirements to store additional data.

The 2025 Regulations place on a statutory basis much of existing practice relating to the collection, retention, sharing and deletion of data held by fostering service providers and any policies required in that respect such as safeguards, concerns, complaints and allegations, recruitment, assessment and review of foster parents. They will enable fostering agencies to register with and be inspected or assessed by the Regulation and Quality Improvement Authority and will enable HSC Trusts to enter into written agreements with fostering agencies—both in the community and voluntary, and independent sectors—to assess and approve foster parents on their behalf. They will place upon the fostering service provider a duty to safeguard and promote the welfare of children placed with foster parents approved by the agency; and to promote contact between foster children and their families and places a duty on the fostering agency to prepare and implement policies for the protection of children.

Personal data that is collected and retained under the provisions of the 2025 Regulations includes:

- prospective foster parents and approved foster parent records including name, address, date of birth and sex of each foster parent (or, where foster parents are approved jointly, of both foster parents), and an enhanced disclosure checks (for foster parent, members of their household and family),

- placement records to include a looked after child's personal data including the name, age and sex of each child placed and the child's address prior to and on leaving placement
- records of each member of staff working for the purposes of the fostering agencies.
- information enabling assessments of prospective foster parents by panel including sensitive and special category data such as enhanced disclosure checks (for foster parent, members of their household and family), medical records and personal references
- information in relation to looked after children contained within foster placement agreements, which may also include their personal history, state of health and educational needs
- Fostering Service Providers – checks on provider, manager, and staff. Details of staff records must be kept for 15 years

The Minimum Standards provide more detailed guidance to fostering standards on they can demonstrate that they are fulfilling their statutory duties for management of personal data. For example, they set out timescales for sharing information when foster parents transfer to a new fostering service, and there are requirements to have appropriate data management policies in place.

In Minimum Standard 4, under Key indicator 4.3.e, fostering services are required to ensure that access to personal and protected information is clearly monitored and managed in accordance with relevant data protection and information management policies.

The intended outcome is that information and personal data about individual children and/or potential foster parents and staff within fostering service providers are kept confidential and only shared with those who have a legitimate and current need to know the information. Records are clear, up to date, stored securely and contribute to an understanding of the child's life and the role that the foster parent played in the child's life. The child's welfare, safety and needs are at the centre of their care. Children and young people know that information about them is managed appropriately and will only be disclosed to others when this is in the interests of their welfare.

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 | <input type="checkbox"/> | <input checked="" type="checkbox"/> | |
| Large scale processing of sensitive data | <input type="checkbox"/> | <input checked="" type="checkbox"/> | |
| Systematic monitoring of individuals | <input type="checkbox"/> | <input checked="" type="checkbox"/> | |
| Use of new technology or novel use of existing technology | <input type="checkbox"/> | <input checked="" type="checkbox"/> | |
| Denial of an individuals' access to a service | <input type="checkbox"/> | <input checked="" type="checkbox"/> | |
| Profiling of individuals on a large scale | <input type="checkbox"/> | <input checked="" type="checkbox"/> | |
| Processing of biometric data | <input type="checkbox"/> | <input checked="" type="checkbox"/> | |
| Processing of genetic data | <input type="checkbox"/> | <input checked="" type="checkbox"/> | |
| Processing of sensitive data or data of a highly personal nature | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <p>Minimum Standard 3, key indicator 3.2.m requires all fostering service providers to maintain records of assessments, approvals and reviews of foster parents and placements, and for those working for the fostering service. Minimum Standards references at Standard 4, key indicator 4.3.e that access to personal and protected information is clearly monitored and managed in accordance with relevant data protection and information management policies. This will require DoH and all fostering service providers to adhere to obligations under ICO guidance:</p> <p>https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/accountability-and-governance/data-protection-by-design-and-default/</p> <p>Compliance with the guidance will be considered by RQIA as part of their assessments of fostering services.</p> <p>Legislative measures are already in place to safeguard the integrity and confidentiality of personal data when processing the assessment and approval of new foster parents. Regulation 16(5)(a)-(b) of the 2025</p> |

| | | | |
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| | | | <p>Regulations provides that any fostering service agency responsible for maintaining any record or register in relation to the foster child or foster parent must ensure that it is kept securely and must ensure that information which it contains is not disclosed to any person except in accordance with any statutory provision under which access to such register, record or information may be obtained or should be granted and any court order under which access may be obtained or given.</p> <p>The Minimum Standards and any guidance will also ensure ICO requirements around integrity and confidentiality of processing personal data, in relation to the assessment and approval of new foster parents, is referenced.</p> |
| Combining, comparing or matching data obtained from multiple sources | <input type="checkbox"/> | <input checked="" type="checkbox"/> | |
| Invisible processing | <input type="checkbox"/> | <input checked="" type="checkbox"/> | |
| Tracking geolocation or behaviour | <input type="checkbox"/> | <input checked="" type="checkbox"/> | |
| Targeting of children or other vulnerable individuals | <input type="checkbox"/> | <input checked="" type="checkbox"/> | |
| Risk of physical harm | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <p>It is important that children in foster care maintain contact with family, friends and others important to them, where it is safe and appropriate for them to do so. Any information relating to such contact arrangements will be recorded in the child's care plan. The Minimum Standards are not introducing new requirements relating to the collection or sharing of information in the care plan, but rather reflecting good practice in that regard.</p> |
| <p>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 the DoH Data Protection Officer for further advice.</p> | | | |
| (ii) Does the project involve any of the following? | Yes | No | If yes, explain your response |

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|---|--------------------------|-------------------------------------|---|
| Automated decision-making with a legal or similar significant effect. | <input type="checkbox"/> | <input checked="" type="checkbox"/> | |
| Processing of data on a large scale. | <input type="checkbox"/> | <input checked="" type="checkbox"/> | |
| 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). | <input type="checkbox"/> | <input checked="" type="checkbox"/> | Minimum Standards will set out the direction for RQIA to inspect and/or assess against the relevant 2025 regulations which allows HSC Trusts to make arrangements with fostering agencies to engage in the activities of recruiting and approving foster parents on their behalf subject to a written agreement that requires data to be collected in relation to perspective foster parents by fostering agencies. |
| A change in location of a business area or branch (e.g. plans to centralise a service or an office move). | <input type="checkbox"/> | <input checked="" type="checkbox"/> | |
| 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). | <input type="checkbox"/> | <input checked="" type="checkbox"/> | |
| Collecting new information about an individual (e.g. gathering information about an individuals' location). | <input type="checkbox"/> | <input checked="" type="checkbox"/> | |
| A new way of gathering personal information (e.g. collecting information online rather than on paper forms). | <input type="checkbox"/> | <input checked="" type="checkbox"/> | |
| A change in the way personal information is stored or secured (e.g. cloud storage). | <input type="checkbox"/> | <input checked="" type="checkbox"/> | |
| A change to how sensitive personal information is managed (e.g. moving health records to a new database). | <input type="checkbox"/> | <input checked="" type="checkbox"/> | |
| Transferring personal information offshore (e.g. using a cloud based application to store data). | <input type="checkbox"/> | <input checked="" type="checkbox"/> | |
| A decision to retain personal information for longer than previously kept (e.g. keeping information for 10 years when | <input type="checkbox"/> | <input checked="" type="checkbox"/> | The 2025 Regulations have increased the retention period for foster parents' records from 10 years to at least 75 years from the date on which approval / placement is terminated, or until foster |

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| you previously only held it for 7). | | | <p>parent's death, if earlier. This change was introduced following consultation on the draft regulations, and will bring fostering regulations in line with adoption legislation and other similar regulations.</p> <p>The Department's framework for document management is 'Good Management, Good Records'. Within the disposal schedule of that document, foster care records must be kept for a minimum of 40 years. It is intended that GMGR will be annotated to reflect the change, and the Department will publicise the change to appropriate end users.</p> <p>No further changes are being made to the retention of documents through the Minimum Standards.</p> |
| Using information classed as 'special category data' (e.g. information about an individual's health). | <input checked="" type="checkbox"/> | <input type="checkbox"/> | Information regarding an application to become a foster parent includes details on health and religion of applicants. |
| Using personal data already held for a new purpose (e.g. to obtain customer profiles). | <input type="checkbox"/> | <input checked="" type="checkbox"/> | |
| Disclosing information to a third party (e.g. following a request from a law enforcement agency to provide information for a particular purpose). | <input type="checkbox"/> | <input checked="" type="checkbox"/> | |
| 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). | <input type="checkbox"/> | <input checked="" type="checkbox"/> | |
| A change in policy that results in people having less access to information that you hold about them (e.g. archiving documents after 6 months into a facility from which they cannot be easily retrieved). | <input type="checkbox"/> | <input checked="" type="checkbox"/> | |

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|--|--------------------------|-------------------------------------|--|
| Establishing a new way of identifying individuals (e.g. a unique identifier, a biometric, or online identity system). | <input type="checkbox"/> | <input checked="" type="checkbox"/> | |
| 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). | <input type="checkbox"/> | <input checked="" type="checkbox"/> | |
| 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). | <input type="checkbox"/> | <input checked="" type="checkbox"/> | |
| 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). | <input type="checkbox"/> | <input checked="" type="checkbox"/> | |
| 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). | <input type="checkbox"/> | <input checked="" type="checkbox"/> | |
| Other privacy intrusions such as body searches, or intrusion into physical space. | <input type="checkbox"/> | <input checked="" type="checkbox"/> | |

Additional Comments/Notes

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

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. | <input type="checkbox"/> |
| Medium* – Some personal information is involved, and several low to medium risks have been identified | <input checked="" type="checkbox"/> |
| High* – Sensitive personal information is involved, and several medium to high risks have been identified | <input type="checkbox"/> |
| Reduced risk – The project will lessen existing privacy risks | <input type="checkbox"/> |
| Inadequate information – More information and analysis is needed to fully assess the privacy impact of the project. | <input type="checkbox"/> |
| Briefly summarise reasons for the rating given | |
| <p>It is recognised that fostering services will be required to obtain, store, share and delete some sensitive personal data in respect of both foster parents and children in foster care. This is for the purposes of ensuring that foster parents are, and continue to be, suitable to care for children, and that children are being cared for in a safe, stable and caring home environment.</p> <p>However, the majority of this information is already collected by HSC Trusts in relation to approval of foster parents, with a small number of additional requirements being introduced through the 2025 Regulations. No new requirements are being introduced through the Minimum Standards.</p> <p>Fostering Agencies will be required to follow the new Minimum Standards developed by the Department which will include requirements in respect of data processing and retention of records and will be subject to inspection by RQIA.</p> | |

*** 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

Given the assessment of privacy impact as medium it is considered that a full data protection impact assessment is required.

8. SIGN OFF

Project Manager

Name: Ursula Mills

Date: 27/03/2025

Signed: *Ursula Mills*

Senior Responsible Owner/Information Asset Owner

Name:

Stefani Millar

Date:

22/05/2025

Signed:

S. A. Mellar

Department of Health

DATA PROTECTION IMPACT ASSESSMENT REPORT

| | |
|--|------------------------|
| DPIA Ref No. | |
| | |
| Project Name | |
| Northern Ireland Fostering Services Minimum Standards | |
| Business Area | |
| Family and Children's Policy Directorate Looked After Children and Adoption Policy Unit | |
| Information Asset Owner | Project Manager |
| Stefani Millar | Ursula Mills |

1. Identify the need for a DPIA - outline the purpose for processing the data and the scope of processing

i) Explain broadly what the project aims to achieve and what type of processing it involves.

The planned Foster Placement and Fostering Agencies Regulations (Northern Ireland) 2025 will allow HSC Trusts to make arrangements for fostering agencies to approve foster parents on their behalf subject to a written agreement; and to bring fostering agencies within the scope of registration and inspection by the RQIA. The Minimum Standards now being introduced will complement the new regulations, to ensure consistency between fostering agencies which are registered with RQIA and statutory fostering services (i.e. HSC Trusts), and to provide more details on how the requirements of the regulations can be met.

Under the provisions of the 2025 Regulations (and other relevant legislation), all fostering services will be required to collect and retain personal data relating to foster carers and to children, such as data relating to health, religion or cultural background. This is for the purposes of ensuring that foster parents are, and continue to be, suitable to care for children, and that children are being cared for in a safe, stable and caring home environment.

- ii) **Outline the scope and purpose of the processing.** *What is the nature of the data? Does it include special category data? How much data will you be collecting and using? How often? How long will you keep it? How many individuals are affected? What geographical area does it cover? What do you want to achieve? What is the intended effect on individuals? What is the nature of your relationship with the individuals? How much control will they have? Would they expect you to use their data in this way? Do they include children or other vulnerable groups? Are there prior concerns over this type of processing or security flaws? What is the current state of technology in this area? Are there any current issues of public concern that you should factor in?*

Personal data that is collected under the requirements of the 2025 regulations includes:

- Information enabling assessments of prospective foster parents including enhanced disclosure checks (for foster parent, members of their household and family), medical records and personal references. This information must be kept a minimum of 75 years.
- Information in relation to looked after children contained within foster placement agreement records, which are shared with fostering agencies and foster parents include:
 - personal data including the name, age and sex of each child placed
 - dates on which their placement began/was terminated
 - the circumstances of termination
 - the child's address prior to and on leaving placement
 - a record of any accidents or serious incidents occurring to the child whilst placed with the foster parent
 - a record of any allegations or complaints about the foster parent and
 - may include their personal history, state of health and educational needs
- Fostering Service Providers - details of staff records must be kept for 15 years

Data will cover all of Northern Ireland and prospective foster parents would expect checks to be made as this is part of their approval process

2. Consult with Relevant Stakeholders

Consider how to consult with relevant stakeholders.

Describe when and how you will seek individuals' views – or justify why it's not appropriate to do so. Who else do you need to involve within the Department or ALBs? Have you consulted with the Data Protection Officer (DPO)? Do you plan to consult with the Assistant Departmental Security Officer (ADSO) regarding information security risks? Do you need to consult with any other experts?

A working group was created to work collaboratively in the development of the new standards and consisted of the following stakeholders

- Department of Health officials from Looked After Children and Adoption Policy Unit, and from Strategic Planning & Performance Group
- HSC Trust representatives
- Fostering agency representatives
- Those representing care experienced children and young people and foster parents.
- Regulation and Quality Improvement Authority representatives
- Foster parents

Specific engagement events were also carried out in October 2024, with foster parents and children in foster care, to seek their views on the new standards.

Work will continue to develop draft Minimum Standards for Fostering services in Northern Ireland, with a full public consultation to be undertaken before summer 2025, followed by implementation by Autumn 2025.

This form will be checked by Departmental DPO.

Describe compliance and proportionality measures. *What is your lawful basis for processing? Does the processing actually achieve your purpose? Is there another way to achieve the same outcome? How will you ensure data quality and data minimisation? What information will you give individuals? How will you help to support individuals' rights? What measures will you take to ensure data processors comply? How will you safeguard any international transfers?*

The lawful basis for processing personal data is provided for in UK GDPR, Article 6(1)(e) - processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller

The lawful basis for processing of special categories of personal data is provided for in UK GDPR, Article 9(2)(h) – health or social care (with a basis in law) – and associated Data Protection Act 2018, Schedule 1, Paragraph (2)(e) – the provision of social care.

Children and young people's individual and human rights are safeguarded and actively promoted within the context of fostering services provided. Data controllers processing data for the purposes of the regulations will be required to uphold data subject rights as part of their controller obligations.

The standards are structured to align with the Northern Ireland Framework for Integrated Therapeutic Care, which has trauma-informed, rights-based care at its foundation. In particular, under Standard 7, there is a specific key area relating to children's rights, "*Children experience dignity, respect and have their legal and human rights upheld*". Under this standard, fostering services are expected to provide children with information about their rights, specifically including how their personal information will be stored and used, and their privacy respected. The standard reiterates that data must only be shared when necessary and legal to do so, and that the reasons for sharing information must be explained to children.

Under standard 4, key area 3, fostering services must comply with all relevant statutory obligations, standards and guidance, including those in respect of information management and data protection. There must be a policy in place that clarifies the purpose, format and content of information to be kept on the fostering service's files, on the child's file and on the case files relating to foster parents. Access to personal and protected information must be clearly monitored and managed in accordance with relevant data protection and information management policies. The creation, use, retention, storage, transfer, disposal of, and access to, records, including those relating to a particular child's placement, must be managed in line with any relevant legislation and policies in place within the fostering service and responsible authority (where different).

Alignment with the standards, including standard 7, will be inspected by RQIA.

It is not expected that there will be any sharing of information internationally.

3. Assess Compliance and Proportionality

4. Identify and Assess Risks

The risk matrix below will help you to assess the level of risk associated with processing the data.

| | | | | |
|---------------------------|----------------|---------------------------|------------------------|----------------------|
| Severity of impact | Serious harm | Low risk | High risk | High risk |
| | Some impact | Low risk | Medium risk | High risk |
| | Minimal impact | Low risk | Low risk | Low risk |
| | | Remote | Reasonable possibility | More likely than not |
| | | Likelihood of harm | | |

| 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 |
|--|-------------------------------------|---------------------------------------|----------------------------|
| Inappropriate access of records by Fostering Agency staff. Northern Ireland Fostering Services Minimum Standards will require mandatory Information Governance and IT security training for all staff. This will be inspected by RQIA. | <i>Remote, possible or probable</i> | <i>Minimal, significant or severe</i> | <i>Low, medium or high</i> |
| | <i>Remote</i> | <i>Some Impact</i> | <i>Low</i> |
| | <i>Remote</i> | <i>Some Impact</i> | <i>Low</i> |
| Information which is collected is not properly stored. | | | |

| | | | |
|---|---------------|--------------------|------------|
| <p>Northern Ireland Fostering Services Minimum Standards will require mandatory Information Governance and IT security training for all staff. This will be inspected by RQIA</p> <p>Communication between Trusts and Fostering Agency via e-mail, there is a risk of unauthorised individuals receiving the e-mail.</p> <p>Northern Ireland Fostering Services Minimum Standards will require mandatory Information Governance and IT security training for all staff. Standards will also include data protection guidance which can be given to data controllers regarding the assessment and approval of foster parents. Organisations will be required to have appropriate policies and guidance for staff on secure email processes and will be responsible for ensuring appropriate organisational and technical security when processing personal data. This will be inspected by RQIA</p> | <i>Remote</i> | <i>Some Impact</i> | <i>Low</i> |
|---|---------------|--------------------|------------|

5. Identify Measures to Reduce Risk

| Identify additional measures you could take to reduce or eliminate risks identified as medium or high risk at 4. | | | | |
|--|-------------------------------------|------------------------------------|------------------------|------------------|
| Risk | Options to reduce or eliminate risk | Effect on risk | Residual risk | Measure approved |
| n/a | n/a | <i>Eliminated reduced accepted</i> | <i>Low medium high</i> | <i>Yes/No</i> |

6. Information Asset Owner (IAO) Sign Off and Outcomes

| | Name & Date | Notes |
|------------------------------------|---------------------------|--|
| Measures approved by (IAO): | Stefani Millar 22/05/2025 | <i>Integrate actions back into project plan, with date and responsibility for completion</i> |

| | | |
|---|--|--|
| Residual risks approved by: | | <i>*If accepting any residual high risk, consult the ICO before going ahead*</i> |
| DPO advice provided: | | <i>DPO should advise on compliance, measures to reduce risk and whether processing can proceed</i> |
| Summary of DPO advice: TBC | | |
| DPO advice accepted or overruled by: | | <i>If overruled, you must explain your reasons</i> |
| Comments: | | |
| Consultation responses reviewed by: | To be completed following public consultation on the draft Minimum Standards | <i>If your decision goes against individuals' views, you must explain your reasons</i> |
| Comments: To be completed following public consultation on the draft Minimum Standards | | |
| This DPIA will be kept under review by: | Ursula Mills/ Stefani Millar | <i>The DPO should also review ongoing compliance with the DPIA</i> |