

**Template for  
DATA PROTECTION IMPACT ASSESSMENT  
REPORT**

(Refer to [DPIA guidance](#) - only to be completed on positive recommendation from screening exercise)

<b>DPIA Ref no.</b>	
FI1/25/ [REDACTED]	
<b>Project Name</b>	
Review of Section 6 and Annex 10 of the NICS Standards of Conduct Policy	
<b>Business Area</b>	
People and Organisational Development, HR Policy	
<b>Information Asset Owner</b>	<b>Project Manager</b>
Aisling Quinn	Joan Fleetham

**Step 1 IDENTIFY THE NEED FOR A DPIA**

*Explain what the project aims to achieve and what types of processing it involves. You may find it helpful to refer or link to other project documentation. Summarise why you identified the need for a DPIA.*

A DPIA is required for changes made to current policies and procedures that involve the processing of personal or sensitive personal data.

The Standards of Conduct policy, Section 6 and Annex 10 deal with the rules for existing civil servants on Private Occupations.

The process to record a second job or private occupation will impact on privacy as it directs personal information to be shared between a member of staff and their line manager; NICSHR Advisors and the HR Services Provider (HR Connect).

The change to the existing policy involves:

- Removal of the provision for civil servants to use annual/flexi leave for the purposes of other public sector work;
- Expressly requiring the use of unpaid leave in such circumstances; and
- Creating better guidance for staff seeking approval for a private occupation with another public sector body on HRConnect, in the form of a Quick Reference Guide (QRG).

The purpose of this DPIA is to ensure that the process in place for this approval is fit for purpose and how it impacts on the changes to policy.

A limitation of the DPIA would be where the member of staff decides to share their own information with a 3<sup>rd</sup> party i.e. colleague.

## STEP 2 DESCRIBE THE PROCESSING

**Describe the nature of the processing:** how will you collect, use, store and delete data? What is the source of the data? Will you be sharing data with anyone/ You may find it useful to refer to a flow diagram or other way of describing data flows What types of processing identified as potentially high risk are involved?

### NATURE OF PROCESSING

The review of **Section 6 and Annex 10 – Private Occupations** removes the provision to use annual/flexi leave for the purposes of other public sector work.

However, the rules around secondary occupations have not changed and the process to seek approval for a secondary occupation with another public sector body remains the same. The rules explain the type of work civil servants are not permitted to do and directs employees to NICSHR for advice and guidance, if required.

Employees are expected to seek approval to undertake any private work (paid or unpaid) with another public sector body. The process for doing this is to access the HRConnect employee self-service function and complete the **Outside Interests** field.

A Quick Reference Guide has been produced to assist with this, as well as a set of FAQs.

Once the employee completes an outside interest on the HRConnect system this creates an alert to NICSHR and the employee's manager for consideration under the rules. A decision is made by the Business Area Grade 5.

This information is retained on HRConnect.

The main process involves;

1. Employee
2. Line Manager
3. Head of Business (Grade 5 or above)
4. NICSHR Employee Relations
5. HRConnect

### ROLE DEFINITIONS

**Employee** – *this is the member of staff who wishes to obtain permission to work for another public sector organisation.*

**Line Manager** – *receives an alert from HRConnect and discusses with the employee, if required.*

**Grade 5 (or above)** – The head of the Business Area makes the decision on whether the second occupation is a conflict of interest or not.

**NICSHR** – receive alert from HRConnect and provide advice to Business Area, if required.

**HRConnect Advisor** – this is the advisor from HRConnect who can provide advice on the policy and procedure for registering a secondary employment.

**Describe the scope of the processing:** what is the nature of the data, and does it include special category, criminal offence data or financial 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?

The HRConnect system allows employees to declare an outside interest through the self-service facility. Outside interests are broken down into three categories, **Outside Interests, Public Appointment and Secondary Employment.**

The policy directs employees to do this in order to get approval for other public sector employment from the Grade 5 of their Business Area. The QRG details how to enter the details on the HRConnect system.

The data does not include any special category, criminal offence or financial data.

As of 31 October 2025, **676** employees have declared an outside interest since the HRConnect facility was introduced in 2007, of this **399** are current. This represents **1.63%** of the workforce who have a current declaration.

As of 31 October 2025, 311 employees have declared a **secondary employment**, since the HRConnect facility was introduced in 2007. This represents a rate of **1.44** declarations a month from a workforce of around 24,500.

There are 160 current 'live' **secondary employment** declarations with end dates in the future or left blank. This represents **0.65%** of the workforce who have a current secondary employment declaration.

The table below shows the breakdown of declared, both open and ended, outside interests and the number of employees who have declared The Electoral Office as the employer. This represents **14.35%** of all employees who have declared an outside interest on the HRConnect system.

GROUP	OUTSIDE INTEREST	PUBLIC APPOINTMENT	SECONDARY EMPLOYMENT	TOTALS
<b>Declared</b>	<b>307</b>	<b>58</b>	<b>311</b>	<b>676</b>
Ended	102	24	151	<b>277</b>
Open	205	34	160	<b>399</b>
<b>Electoral Office</b>	28	8	61	<b>97</b>

The information is retained on HRConnect.

**Describe the context of the processing:** what is the nature of your relationship with the data subjects? 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? Is it novel in any way? What is the current state of technology in this area? Are there any issues of public concern that you should factor in?

#### **DATA SUBJECT**

Any employee seeking to work for another public sector organisation (paid or unpaid work) is directed in the policy to seek approval. The process for doing this is described and a **Quick Reference Guide** has been produced which will take the employee through the online process. This mitigates the risk of the employee being unable to use the system correctly.

Also, a set of **FAQs** has been developed to explain the change in procedure around the use of annual/flexi leave and the removal of this provision.

The data entered by the employee is strictly used for the purposes of obtaining approval in the circumstances already stated.

There are no issues of public concern to be factored in and the change to process has no impact on children or vulnerable groups.

**Describe the purposes of the processing:** what do you want to achieve? What is the intended effect on individuals? What are the benefits of the processing – for the Department or more broadly?

The benefits of the change are related to the policy provision rather than the data processing already in place:

- The policy changes will prevent civil servants claiming, 'double payment from the public purse';
- The policy changes also bring the rules into line with **DAO (DFP) 02/11 Remuneration of Independent Board Members**, which outlines the guiding principle to avoid 'double-paying' for the remuneration of independent board members in circumstances where the individual is a public sector employee.
- The policy allowed for a portion of annual or flexi leave to be used for other public sector work, detailed in Annex 10. Annex 10 has been removed.

To support this, the revised policy and process will include a QRG and FAQs.

### STEP 3 CONSULTATION PROCESS

**Consider how to consult with relevant stakeholders:** describe when and how to seek data subjects' views - or justify why it is not appropriate to do so. Who else needs to be involved within the organisation? Do you need to consult with data processors? Do you plan to consult with information security experts or any other specialists?

Internal Stakeholders:

- Consultation has taken place and approval received from the Finance and HR Advisory Group (FHRAG), made up of Senior Civil Servants.
- Revised policy and FAQs have been developed with CTUS and have been the subject of formal consultation.
- A communication plan has been developed to advise of the changes to take place.

External Stakeholders

- HR services provider (currently HR Connect) will have involvement with advising employees on the policy and the process for seeking approval. This has been subject to consultation and a formal change proposal process with ESS and Shared Service Centre.
- The Electoral Office for NI have been consulted on the revised change to policy and an exception has been included in the policy for polling and count duties in elections as a result of this consultation.

#### STEP 4 ASSESS NECESSITY AND PROPORTIONALITY

**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 prevent function creep? How will you ensure data quality and data minimisation? What information will you give individuals? How will you help to support their rights? What measures do you take to ensure processors comply? How do you safeguard any international standards?

The lawful basis for processing personal data is under Article 6 of GDPR in that the processing is necessary to comply with rules for civil servants regarding secondary employment.

A new HR system will be coming in around 2027 which will provide the same or better functionality currently available.

STEP 5 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 <i>Remote, possible or probable</i>	Severity of harm <i>Minimal, significant or severe</i>	Overall risk <i>Low, medium or high</i>
1. There is a risk that personal data gathered is processed for purposes other than those set out within our legal basis.		<i>Remote</i>	<i>Significant</i>	<i>Low</i>
2. There is a risk that personal data gathered is processed for purposes other than what the member of staff would expect.		<i>Remote</i>	<i>Significant</i>	<i>Low</i>
3. There is a risk that data is kept for longer than necessary by HRConnect/Line Managers.		<i>Remote</i>	<i>Minimal</i>	<i>Low</i>
4. There is a risk that where established departmental records management systems are used they might have incorrect access controls.		<i>Possible</i>	<i>Significant</i>	<i>Medium</i>
STEP 6 PROPOSED PRIVACY SOLUTIONS				
Risk No	Measures to reduce or eliminate	Effect on risk (Eliminated, Reduced or Accepted)	Residual risk ( Low, Medium or High)	Measure Approved? (Yes/No)
<i>4</i>	<p><b><i>There is a risk that where established departmental records management systems are used they might have incorrect access controls.</i></b></p> <p><i>Managers are not required to create or store information; however, where established departmental records management systems are used there is still the possible risk of user error. Managers are aware of GDPR and receive mandatory training regularly.</i></p>	<i>Accepted</i>	<i>Medium</i>	

**STEP 7 APPROVAL PROCESS**

	<b>Name/Date</b>	<b>Notes</b>
Measures approved by:	<b>Joan Fleetham</b>	Integrate actions back into project plan, with date and responsibility for completion
Residual risks approved by:	<b>N/A</b>	If accepting any high residual 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/overruled by:		If overruled, you must explain your reasons below
Comments		
Consultation responses reviewed by:		If your decision departs from individuals' views, you must explain your reasons below
Comments		
This DPIA will be kept under review by:		The DPO should review ongoing compliance with the DPIA

## Legitimate Interests Assessment (LIA) template

This legitimate interests assessment (LIA) template is designed to help you to decide whether or not the legitimate interests basis is likely to apply to your processing. It should be used alongside the ICO's [legitimate interests guidance](#).

### **Part 1: Purpose test**

You need to assess whether there is a legitimate interest behind the processing.

- Why do you want to process the data?
- What benefit do you expect to get from the processing?
- Do any third parties benefit from the processing?
- Are there any wider public benefits to the processing?
- How important are the benefits that you have identified?
- What would the impact be if you couldn't go ahead with the processing?
- Are you complying with any specific data protection rules that apply to your processing (eg profiling requirements, or e-privacy legislation)?
- Are you complying with other relevant laws?
- Are you complying with industry guidelines or codes of practice?
- Are there any other ethical issues with the processing?

### **Part 2: Necessity test**

You need to assess whether the processing is necessary for the purpose you have identified.

- Will this processing actually help you achieve your purpose?
- Is the processing proportionate to that purpose?
- Can you achieve the same purpose without the processing?
- Can you achieve the same purpose by processing less data, or by processing the data in another more obvious or less intrusive way?

### Part 3: Balancing test

You need to consider the impact on individuals' interests and rights and freedoms and assess whether this overrides your legitimate interests.

#### **Nature of the personal data**

- Is it special category data or criminal offence data?
- Is it data which people are likely to consider particularly 'private'?
- Are you processing children's data or data relating to other vulnerable people?
- Is the data about people in their personal or professional capacity?

#### **Reasonable expectations**

- Do you have an existing relationship with the individual?
- What's the nature of the relationship and how have you used data in the past?
- Did you collect the data directly from the individual? What did you tell them at the time?
- If you obtained the data from a third party, what did they tell the individuals about reuse by third parties for other purposes and does this cover you?
- How long ago did you collect the data? Are there any changes in technology or context since then that would affect expectations?
- Is your intended purpose and method widely understood?
- Are you intending to do anything new or innovative?
- Do you have any evidence about expectations – e.g. from market research, focus groups or other forms of consultation?
- Are there any other factors in the particular circumstances that mean they would or would not expect the processing?

#### **Likely impact**

- What are the possible impacts of the processing on people?
- Will individuals lose any control over the use of their personal data?
- What is the likelihood and severity of any potential impact?
- Are some people likely to object to the processing or find it intrusive?
- Would you be happy to explain the processing to individuals?

- Can you adopt any safeguards to minimise the impact?

Can you offer individuals an opt-out?

Yes / No

#### Part 4: Making the decision

This is where you use your answers to Parts 1, 2 and 3 to decide whether or not you can apply the legitimate interests basis.

Can you rely on legitimate interests for this processing?

Yes / No

Do you have any comments to justify your answer? (optional)

Processing of the data is necessary to meet the rules of **Section 6 Private Occupations**. These rules are part of the NICS Standards of Conduct policy and form part of the terms and conditions of employees. Data is not used intrusively or in a way that could cause harm.

LIA completed by

17/11/2025

Date

#### What next?

- Keep a record of this LIA, and keep it under review.
- Do a DPIA if necessary.
- Include details of your purposes and lawful basis for processing in your privacy information, including an outline of your legitimate interests.