

LAWFULNESS, FAIRNESS AND TRANSPARENCY TEST

Application of FOI exemption Section 40(2)

DoF/2026-0546 - Annex D

A Lawfulness, Fairness and Transparency Test must be carried out by the Department of Finance when considering disclosure of third-party personal data which falls within the scope of an FOI or EIR request.

Brief description:

I was referred to you by the Committee for Finance in relation to historic correspondence concerning bereavement services and Tell Us Once in Northern Ireland. I'm carrying out research into the NI-specific administrative and policy context, linked to the NI Executive's draft AI Strategy and its bereavement / linked citizen services use case.

I would be grateful if you could provide copies of the Department of Finance correspondence or briefing material referred to in the Committee for Finance minutes, particularly:

- the Departmental response considered in December 2024 in relation to bereavement services / Tell Us Once
- any subsequent update considered by the Committee in November 2025
- and any related written briefing on the Tell Us Once service provided to the Committee

I'm particularly interested in historic information relating to departmental responsibilities, data-sharing, legal or operational dependencies, and the structure of bereavement services in Northern Ireland. I'm not seeking information on any current discussions with DWP. I am looking for the historic Departmental material already referenced in the public Assembly record.

Consideration of the personal data falling within the scope of the request

Guidance from the Information Commissioner's office states that personal data only includes information relating to natural persons who:

- can be identified or who are identifiable, directly from the information in question; or
- who can be indirectly identified from that information in combination with other information.

Description of personal data/issue(s) under consideration:

DoF Staff names/details.

Lawfulness

Do either of the two lawful basis below, which allow for the disclosure of personal data, apply? **No**

- ☐ **Consent:** This applies when the data subject(s) clear consent exists, allowing the department to disclose personal data falling within the scope of this request.
- ☐ **Legitimate interests:** This applies when disclosure is necessary for the department's legitimate interests or the legitimate interests of a third party that overrides the data subject(s) rights and freedoms, particularly their right to privacy.

Conclusion

Having considered all the information contained within the Lawfulness, Fairness and Transparency Test, the department has established that, on balance, there is no lawful basis for the disclosure of third-party personal data falling within the scope of the request (of which the requester is not the data subject).