

**DATA PROTECTION IMPACT ASSESSMENT REPORT**

<b>DPIA Ref no.</b>	
NISRA 07/2019	
<b>Project Name</b>	
Census 2021	
<b>Business Area</b>	
NISRA - Census Office	
<b>Information Asset Owner</b>	<b>Project Manager</b>
Alexander Fitzpatrick	Gillian McCrory

**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.*

Aims

NISRA is responsible for the delivery of the census in Northern Ireland and aims to collect census returns from all households and communal establishments across Northern Ireland. The next census is planned for March 2021. The census is carried out under the Census Act (Northern Ireland) 1969 which specifies the mandatory nature of the census.

A full end-to-end rehearsal in 2019 will run across three geographical areas to test all systems, processes and plans. Participation in the rehearsal is voluntary. The rehearsal areas are:

- South & East Belfast
- Craigavon
- West Fermanagh

The successful running of the census will result in the collection of up-to-date data for the Northern Ireland population relating to census day on the 21 March 2021.

## Types of processing

The 2021 Census has a 'Digital First' approach with the aim to collect the majority of responses online. All paper returns will be converted to electronic data following collection and paper returns destroyed. Data will be transferred securely by secure file transfer. All data will be processed within the secure environment of the Census Office at NISRA headquarters.

## Need for a DPIA

The privacy impact of the 2021 Census was internally screened and given a rating of High therefore requiring a full DPIA to be carried out. Census Office will be responsible for capturing and processing large volumes of personal and sensitive data on a Northern Ireland wide scale and has a responsibility to ensure the impact is assessed in light of data protection.

## 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?

## Data source

The source of the data collected for the 2021 Census are the responses to the census questionnaire returned by households and communal establishments across Northern Ireland.

## Data collection

The data will be collected via two main methods:

- Online responses or
- Paper returns

The 2021 Census adopts a 'Digital First' approach encouraging returns via the secure electronic questionnaire (eQ) online system. Around 20% of households (in areas of poor broadband coverage or composed of elderly people) will be provided with a paper questionnaire in the first instance. Paper questionnaires will also be available on request and provided to non-respondents.

NISRA are working closely with counterparts in England and Wales, the Office for National Statistics (ONS), in the delivery of the census.

All data collected via the eQ system will be encrypted and transferred in accordance with ONS government data transfer standards to the Survey Data Exchange (SDX) facility operated and managed by ONS.

Information from eQ will be transferred to, and queued by, SDX prior to onward transmission to the Census Test Load and Analysis System.

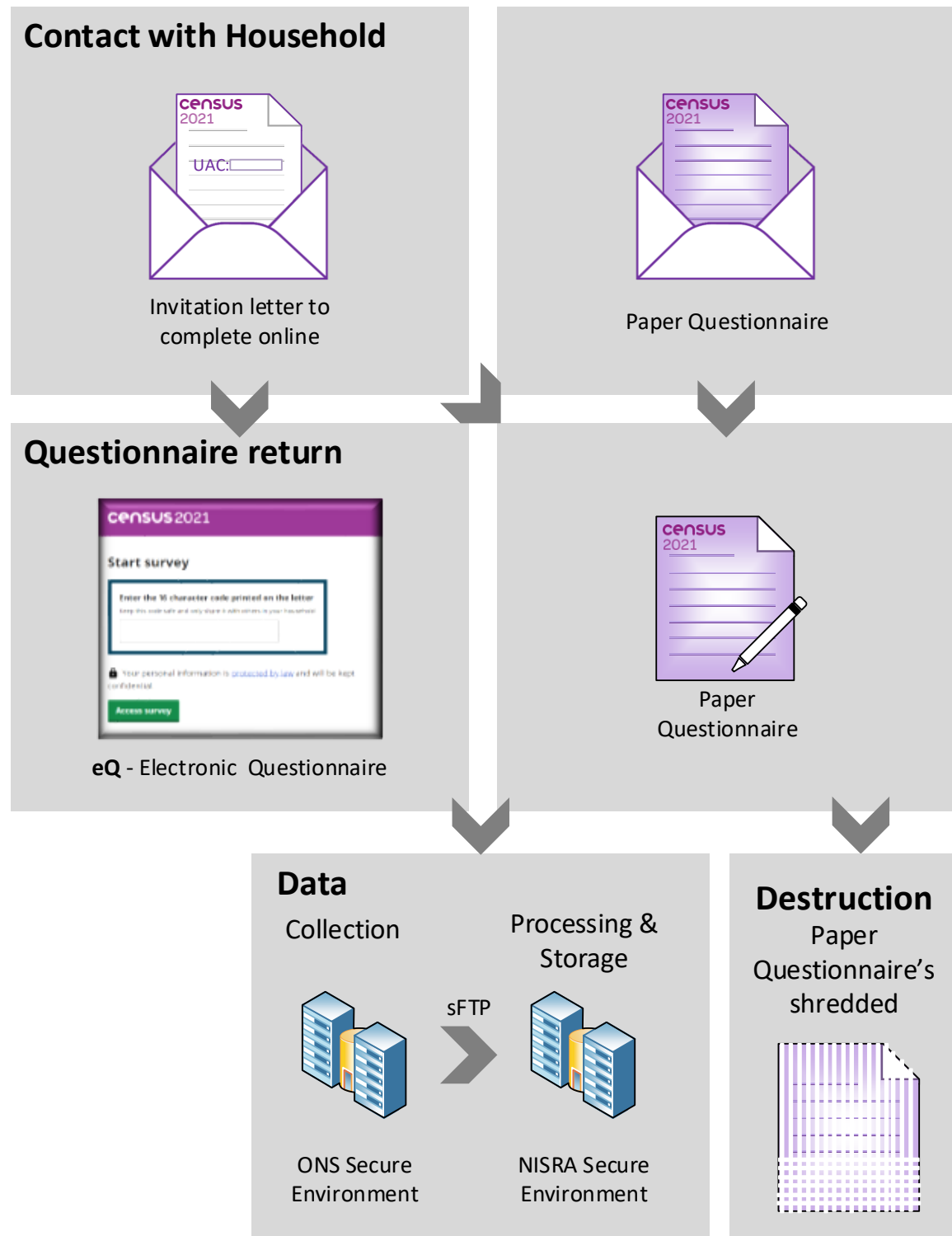
SDX, operated and managed by ONS, has been tested and accredited in accordance with government security and technical standards and approved to hold data classified as 'Official Sensitive'. Links via the SDX Gateway have completed end-to-end testing successfully and been accredited.

The Paper Questionnaire Return Service (PQRS), contracted to Royal Mail, manages the return of all paper questionnaires. Paper questionnaires will be returned by the respondent in pre-addressed envelopes through the Royal Mail. Questionnaires will then be receipted by Royal Mail and transferred to the paper data capture centre where they will be captured and coded. The captured and coded data will be returned to NISRA Census Office via secure file transfer protocol (sFTP).

#### Paper Questionnaire Destruction

Paper questionnaire destruction will be carried out at the paper data capture centre once Census Office has accepted receipt of the coded data and images. Questionnaires approved for destruction will be shredded on-site into pieces no larger than 4x15mm, as required by HMG IA Standard No 5, Secure Sanitation. The shredded paper will then be recycled. Destruction will be performed by a certified Shredding Service with qualifications for handling sensitive information.

The below diagram outlines the flow of data from collection to processing.



### Data Sharing

Census Office treats the information we hold with respect, keeping it secure and confidential.

Information collected under the census is processed within the secure environment of Census Office. The personal data is never shared with organisations outside of Census Office. Only aggregated depersonalised data will be published under census outputs.

To successfully deliver the census, personal data may be available to contracted suppliers of key systems and services during collection and processing for the purposes of carrying out a census. All such contractors will sign (on paper or virtually) a Census Confidentiality Undertaking (CCU) to be retained by Census Office.

Personal data will only ever be used to produce statistics or undertake statistical research and will not be transferred outside the UK.

### Data retention

Census Office manage all data in line with the DoF Retention and Disposal Schedule: <https://www.finance-ni.gov.uk/publications/dof-records-and-information-management-policy-and-retention-and-disposal-schedule>. The Schedule complies with the requirements of the Public Records Act (NI) 1923 and the Disposal of Documents Order (S.R. & O. 1925 No.167). Digital information collected under the Census will be initially retained by the Department with the option thereafter for Permanent Preservation in the Public Record Office of Northern Ireland (PRONI). Paper questionnaire returns will be securely destroyed on site at the paper data capture centre once Census Office has accepted the digital data.

### Risk

The information gathered under the census is treated securely throughout collection, processing and storage, thus greatly reducing any risk. All personnel who are associated with managing census data are subject to the Census Confidentiality Undertaking (CCU). The signees of the undertaking agree to abide by the specified statutory and ethical obligations. All individuals working on the 2021 Census, in England and Wales or in Northern Ireland, are subject to confidentiality requirements set out in the Statistics and Registration Service Act 2007, the Census Act (Northern Ireland) 1969 and Data Protection Legislation (including the General Data Protection Regulation and the Data Protection Act 2018). Breaching the provisions of this legislation is a criminal offence and could result in prosecution which, if found guilty, would mean the person would have a criminal record and be liable to a fine and/or up to two years imprisonment. Systems and businesses involved in the collection, transfer and storage of census data hold accreditation to appropriate standards.

**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?

Data gathered by Census Office is collected and processed under the Census Act (Northern Ireland) 1969.

A full list of the individual questions asked in the Census Household Questionnaire is contained in Appendix A.

### **Nature of the data**

Data gathered under the census can be categorised as personal and sensitive personal data.

Personal:

- Name;
- Date of birth;
- Sex;
- Marital or civil partnership status;
- Country of birth
- National identity;
- Ethnic group;
- Current religion;
- Religion brought up in;
- Main language;
- Proficiency in English;
- Knowledge of Irish;
- Knowledge of Ulster-Scots;
- Long-term health problem or disability;
- Nature of long-term condition;
- Provision of unpaid care;
- Qualifications;
- Sexual Orientation; and
- Employment

From the above list the following are classified as sensitive personal:

- Sexual orientation;
- National identity;
- Current religion;
- Religion brought up in;
- Long-term health problem or disability; and
- Nature of long-term condition

The Census questionnaire gathers information categorised as special category as below:

An individual's ethnic group

Question asked:

Q12 - What is your ethnic group?

Religious beliefs

Question asked:

Q13 - What religion, religious denomination or body do you belong to?

Q14 - What religion, religious denomination or body were you brought up in?

Sexual Orientation

Question asked (to individuals aged 16 or over only):

Q23 – Which of the following best describes your sexual orientation?

No criminal offence data or financial data is collected under the census.

**Extent of data collection**

The census is a once in a decade event with the first census in Northern Ireland carried out in 1926, the last in 2011 and the next planned for 2021.

A full end-to-end census rehearsal in 2019 will run across three geographical areas to test all systems, processes and plans. The rehearsal areas are:

- South & East Belfast
- Craigavon
- West Fermanagh

Responses to the 2019 census rehearsal are voluntary.

A Northern Ireland wide census will take place in March 2021 incorporating around 800,000 households. Responses to the 2021 Census rehearsal are mandatory.

Data collected by the census will contain both household and individual questions. Individual questions are listed in Appendix A.

- Under the Census Act (Northern Ireland) 1969 data collected under the census must be retained as a closed record.

Data retention

Census Office manage all data in line with the DoF Retention and Disposal Schedule: <https://www.finance-ni.gov.uk/publications/dof-records-and-information-management-policy-and-retention-and-disposal-schedule>. The Schedule complies with the requirements of the Public Records Act (NI) 1923 and the Disposal of Documents Order (S.R. & O. 1925 No.167). Information collected under the Census will be initially retained by the Department with the option thereafter for permanent preservation in the Public Record Office of Northern Ireland (PRONI).

Paper questionnaire returns will be securely destroyed on site at the paper data capture centre once Census Office has accepted the digital data.

**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?

#### Relationship with data subjects

The data subjects for the census are the respondents across Northern Ireland who return their census questionnaires. Returns are collected per household and include children and other vulnerable groups within each household.

A full end-to-end rehearsal in 2019 will run across three geographical areas to test all systems, processes and plans. The rehearsal responses are voluntary.

The next census is planned for March 2021 and is carried out under the Census Act (Northern Ireland) 1969 which specifies the mandatory nature of the census.

Respondents will sign or make digitally a declaration to state that the questionnaire has been completed to the best of their knowledge and belief.

#### Processing

The 2021 Census adopts a 'Digital First' approach encouraging returns via the securely encrypted electronic questionnaire (eQ) online system. Around 20% of households (in areas of poor broadband coverage or composed of elderly people) will be provided with a paper questionnaire in the first instance. Paper questionnaires will also be available on request and provided to non-respondents. Whilst electronic returns were used during the 2011 census, the digital first approach is new to the 2021 Census in Northern Ireland. However, it is in line with the ONS 2021 Census and they will be using the same eQ systems to collect electronic returns. All systems and businesses involved in the collection, transfer and storage of census data hold accreditation to appropriate standards.

#### Public concern

Data subjects can find out more about how Census Office will use their data through the Census Privacy Notice. A printed version will be made available to paper respondents and online respondents will have the opportunity to read the Privacy Notice online before completing their online questionnaire. The Privacy Notice answers the following questions:

- Why are you processing my personal information?
- What categories of personal data are you processing?
- Where do you get my personal data?
- Do you share my personal data with anyone else?
- How long do you keep my personal data?
- What rights do I have?
- How do I complain if I am not happy?



The public can find further information on how we keep their data safe at <https://census.gov.uk/ni/keeping-your-data-safe/>

Assistance will be available to the respondents in a variety of ways from a census helpline to completion events.

**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 purpose of the census is to successfully collect and process census returns from households and communal establishments across Northern Ireland in line with the Census Act (Northern Ireland) 1969. The Act sets out the responsibility of the Registrar General for Northern Ireland to make arrangements for the Northern Ireland Census. The role of the Registrar General sits with the Chief Executive of NISRA within the Department of Finance. The Act also states that the Registrar General is responsible for the production of abstracts and reports after the taking of the census.

The successful collection and processing of information obtained in the census provides an up-to-date profile of the Northern Ireland population to help shape the future. The information captured helps decide how services are planned and funded across Northern Ireland such as doctors' surgeries, housing or new bus routes. The intended effect on individuals is to take the responses they provide to produce an accurate profile of the population to best meet their needs.

### 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?

#### Data Subjects

The data subjects for the census are the respondents across Northern Ireland who return their census questionnaires. Returns for the 2019 census rehearsal are voluntary whereas returns for the 2021 Census are mandatory.

#### Internal stakeholders

There are a number of internal stakeholders associated with the 2019 census rehearsal and the 2021 Census.

Dr David Marshall is the NISRA Director of Census and Population Statistics and thus can be considered a key stakeholder in the project.

As the Information Asset Owner (IAO), Sandy Fitzpatrick (who is Head of Census) has key responsibility over the 2019 census rehearsal and the 2021 Census and is

a key stakeholder. The IAO signs off this document and must be confident the DPIA meets all requirements.

The NISRA Business Area Information Manager (BAIM) also has a key role to play and interest in the 2019 census rehearsal and the 2021 Census. The BAIM must be satisfied that the project meets all desired criteria in line with current data protection policies.

Various teams within Census Office will use the data extracted from the 2019 census rehearsal and the 2021 Census as below:

The full data extract of the 2019 census rehearsal will be used for testing and development of processes prior to the 2021 Census. The 2021 Census data will be validated, processed and enhanced to fix errors, adjusted for coverage issues and prepared for outputs.

De-identified extract may be used by the Census Outputs Team to develop and test methodologies around post-tabular disclosure control of outputs

Address Data extract will be used by the address register team to match and validate addresses. The information gained will be used to enhance the address register development processes.

#### External Stakeholders

The Office for National Statistics (ONS), National Records of Scotland (NRS) and the Central Statistics Office (Ireland) are key stakeholders in the project who have a keen interest in the 2019 census rehearsal and the 2021 Census.

The general public can also be considered as key external stakeholders due to their participation and interest the 2019 census rehearsal and the 2021 Census. The public were involved in a Public Acceptability Survey in Spring 2017 where they could feedback on specific areas including the proposed sexual orientation question. Members of the public have also been invited to take part in focus groups to explore the relevant issues. The focus groups were run by the Human Resource Consultancy Services (HRCS) branch of NISRA on behalf of Census Office.

Respondents to the 2015 Topic Consultation may also be considered as external stakeholders. This included 35 organisations and 11 individuals.

**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?

Lawful Basis for processing

NISRA have a lawful basis for collecting and processing census data under the Census Act (Northern Ireland) 1969.

The first data protection principle states that any processing of personal data must be fair and lawful. There must therefore be lawful and legitimate basis for collecting, processing and using information.

NISRA, an agency of the Department of Finance, and as Data Controller will ensure an open and honest approach with Northern Ireland households, this is met as set out below:

- Information will be handled in ways the respondents may reasonably expect. Respondents will have the option to securely return their questionnaires online or via post. NISRA's top priority is to keep every respondent's census information secure and confidential. The design of the online collection system will ensure that appropriate security measures are taken to safeguard the confidentiality of the information provided by respondents, counteract threats from hacking or attempts to disrupt the system or deface the website. The system is fully accredited and is designed to ensure that data submitted is not accessible to undesignated users.
- The legitimate grounds for collecting and using the information obtained in the census are to gain an up-to-date profile of the Northern Ireland population to help shape the future of service provision and resource allocation.
- NISRA will not use the data in ways that will have unjustified adverse effects on individuals. The data will not be used to make decisions on individuals, but rather aggregated to be used by central and local government, health authorities and many other organisations to plan and provide future services.
- NISRA will be transparent with respondents about how the information will be used and give potential respondents appropriate assurances when collecting their personal data. Initial written communication and online communication will inform those taking part that NISRA will ensure personal information will be kept confidential and protected by law. Data subjects can find out more about how Census Office will use their data through the Census Privacy Notice. A printed version will be made available to paper respondents and online respondents will have the opportunity to read the Privacy Notice online before completing their questionnaire.

- NISRA have a lawful basis for processing personal data under the Data Protection Act 2018<sup>1</sup> and adhere to the six data protection principles of the Act. The Act is designed to protect personal data and follows the EU Data Protection Directive 1995 considering protection, processing and movement of data. All data gathered by Census Office is processed under the Census Act (Northern Ireland) 1969.
- NISRA, as with all data, will ensure we do not do anything unlawful with the data collected during the 2021 Census.

### Conditions for processing personal data.

Return of the 2021 Census questionnaire is mandatory under the Census Act (Northern Ireland) 1969.

Additional conditions of the first data protection principle met by NISRA include:

- The processing is carried out by a not-for-profit organisation and does not involve disclosing personal data to a third party, unless the individual consents.
- The processing is necessary for administering governmental functions through use by central and local government, health authorities and many other organisations to plan and provide future services.

### Purpose realised

Registrars General has been successfully carrying out censuses in Northern Ireland for nearly 100 years. With the technology to support processing continually advancing and the skilled workforce involved, the processing is on course to achieve the overall purpose of the 2021 Census. There is no other survey which produces the same extent of results as the census both regarding content and geographical coverage.

### Function creep

Data gathered by Census Office is collected and processed under the Census Act (Northern Ireland) 1969 and for no other purpose. All personnel who are associated with managing census data are subject to the Census Confidentiality Undertaking (CCU) and thus the information collected is safeguarded. Census Office holds all information in a secure physical environment within secure systems.

### Data Quality

Much work has been carried out within Census Office on the content of the census questionnaire to ensure it is fit for purpose. Consultations and question testing have been carried out to shape the final questions included, see individual questions listed in Appendix A. As a result, along with the chosen data collection methods, the Census team believe the data quality of returns has been shaped to be the best it can be dependent on respondent returns.

<sup>1</sup> <http://www.legislation.gov.uk/ukpga/2018/12/contents/enacted>

## Data Minimisation

Census Office limits personal data collection, storage, and usage to that which is acceptable under the Census Act (Northern Ireland) 1969. The data collected is relevant, adequate, and absolutely necessary for carrying out the Census. A key principle of the 2021 Census is that no more questions were asked than in the 2011 Census.

## Individuals – information and rights

Completion of the 2021 Census is mandatory under the Census Act (Northern Ireland) 1969. Individuals can find out more about how Census Office will use their data through the census Privacy Notice. A printed version will be made available to paper respondents and online respondents will have the opportunity to read the privacy notice online before completing their questionnaire.

## Compliance of processors

All personnel who are associated with managing census data are subject to the Census Confidentiality Undertaking (CCU). The signees of the undertaking agree to abide by the specified statutory and ethical obligations. All individuals working on the 2021 Census, in England and Wales or in Northern Ireland, are subject to confidentiality requirements set out in the Statistics and Registration Service Act 2007, the Census Act (Northern Ireland) 1969 and Data Protection Legislation (including the General Data Protection Regulation and the Data Protection Act 2018). Breaching the provisions of this legislation is a criminal offence and could result in prosecution which, if found guilty, would mean the person would have a criminal record and be liable to a fine and/or up to two years imprisonment. Systems and businesses involved in the collection, transfer and storage of census data hold accreditation to appropriate standards.

## International standards

The NISRA Census Office work very closely with the Office for National Statistics (ONS) who are responsible for the delivery of the census in England & Wales. Several joint contracts are in place with ONS for the delivery of the census providing consistency across the three countries.

NISRA co-hosted the 2019 International Census Forum with the Irish Central Statistics Office (CSO) in September 2019 and met with Census representatives from other English speaking countries to learn from each other.

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>
<p><b>1. Personal data must be processed lawfully, fairly and in a transparent manner</b></p> <p>DoF is a registered Data Controller with the ICO and as a DoF agency NISRA have a legal basis for processing the data gathered under the Data Protection Act 2018<sup>2</sup> and adhere to the eight data protection principles of the Act.</p> <p>Return of the 2021 Census questionnaire is required by law and as such this fulfils the conditions required to process the personal data supplied.</p> <p>The risk of the unfair and unlawful processing of the 2019 census rehearsal and the 2021 Census data is an individual, corporate and compliance risk. All data gathered by Census Office is processed under the Census Act (Northern Ireland) 1969.</p> <p><u>Individual Risk:</u></p> <ul style="list-style-type: none"> <li>The potential respondent may choose not to return their questionnaire based on a lack of assurance that their data will be processed fairly and lawfully.</li> </ul>	<i>Remote</i>	<i>Significant</i>	<i>Low</i>

<sup>2</sup> <http://www.legislation.gov.uk/ukpga/2018/12/contents/enacted>

<ul style="list-style-type: none"> <li>The respondent will return their completed questionnaire but does not have a full understanding relating to the purpose their data will be processed for.</li> </ul> <p><u>Corporate Risk:</u> Noncompliance with the Data Protect Act could lead to:</p> <ul style="list-style-type: none"> <li>Enforcement actions such as monetary penalty in the event of a serious breach.</li> <li>Reputational damage and loss of public trust in NISRA.</li> </ul> <p><u>Compliance Risk:</u></p> <ul style="list-style-type: none"> <li>Non-compliance with data protection legislation</li> <li>Non-compliance with the Privacy and Electronic Communications Regulations (PECR)</li> <li>Non-compliance with human rights legislation.</li> <li>Non-compliance with sector specific legislation or standards.</li> </ul>			
<p><b>2. Personal data must be collected for specified, explicit and legitimate purposes</b></p> <p>Data collected under both the 2019 census rehearsal and Census 2021 will be used only for the purpose of the Census. Any other use is outside scope and will not be permitted.</p> <p><u>Individual Risk:</u></p> <ul style="list-style-type: none"> <li>A respondent's data collected for the 2019 census rehearsal and the 2021 Census will be used for Census purposes.</li> </ul>	<i>Remote</i>	<i>Significant</i>	<i>Low</i>

<p><u>Corporate Risk:</u></p> <ul style="list-style-type: none"> <li>• Reputational damage and loss of public trust in NISRA.</li> </ul> <p><u>Compliance Risk:</u></p> <ul style="list-style-type: none"> <li>• Non-compliance with data protection legislation</li> <li>• Non-compliance with the Privacy and Electronic Communications Regulations (PECR)</li> <li>• Non-compliance with the Human Rights Act (1998).</li> </ul>			
<p><b>3. Personal data must be adequate, relevant and limited to what is necessary</b></p> <p>Questions have been designed and ordered in such a way to return relevant and adequate information for the purpose of the census.</p> <p>All of the personal data gathered through the census is covered under the Census Act (Northern Ireland) 1969.</p> <p><u>Individual Risk:</u></p> <ul style="list-style-type: none"> <li>• The personal data collected from the respondent is excessive and not adequate to the purpose of the 2019 census rehearsal and the 2021 Census.</li> </ul> <p><u>Corporate Risk:</u></p> <ul style="list-style-type: none"> <li>• Reputational damage and loss of public trust in NISRA.</li> </ul> <p><u>Compliance Risk:</u></p> <ul style="list-style-type: none"> <li>• Non-compliance with data protection legislation</li> </ul>	<i>Remote</i>	<i>Significant</i>	<i>Low</i>



<ul style="list-style-type: none"> <li>• Non-compliance with the Privacy and Electronic Communications Regulations (PECR)</li> <li>• Non-compliance with the Human Rights Act (1998).</li> </ul>			
<p><b>4. Personal data must be accurate and, where necessary, kept up to date</b></p> <p>Within each household the questionnaire asks individuals to complete the form e.g. Person 1, Person 2. This ensures accurate data is obtained from each required individual.</p> <p>Information is treated as accurate at time of collection. If an individual's circumstances change resulting in a change to their personal data, this does not have an impact on the data collected through the census.</p> <p><u>Individual Risk:</u></p> <ul style="list-style-type: none"> <li>• The potential respondent does not return data that is accurate or up to date.</li> </ul> <p><u>Corporate Risk:</u></p> <ul style="list-style-type: none"> <li>• Out of date or inaccurate data is used within Census Office.</li> </ul> <p><u>Compliance Risk:</u></p> <ul style="list-style-type: none"> <li>• Non-compliance with data protection legislation</li> <li>• Non-compliance with the Privacy and Electronic Communications Regulations (PECR)</li> <li>• Non-compliance with the Human Rights Act (1998).</li> </ul>	<i>Remote</i>	<i>Significant</i>	<i>Low</i>

<p><b>5. Personal data must be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the data is processed</b></p> <p><u>Individual Risk:</u></p> <ul style="list-style-type: none"> <li>• Potential loss of personal data</li> </ul> <p><u>Corporate Risk:</u> Noncompliance with the Data Protection Act could lead to:</p> <ul style="list-style-type: none"> <li>• Enforcement actions such as monetary penalty in the event of a serious breach.</li> <li>• Reputational damage and loss of public trust in NISRA.</li> </ul> <p><u>Compliance Risk:</u></p> <ul style="list-style-type: none"> <li>• Non-compliance with data protection legislation</li> <li>• Non-compliance with the Privacy and Electronic Communications Regulations (PECR)</li> <li>• Non-compliance with the Human Rights Act (1998).</li> </ul>	<i>Remote</i>	<i>Severe</i>	<i>Low</i>
<p><b>6. Personal data must be processed in a manner that ensures appropriate security of the personal data.</b></p> <p><u>Individual Risk:</u></p> <ul style="list-style-type: none"> <li>• Data returned by the respondent is not secure and thus risks a data breach.</li> </ul> <p><u>Corporate Risk:</u></p>	<i>Remote</i>	<i>Severe</i>	<i>Low</i>

<p>Noncompliance with the Data Protect Act could lead to:</p> <ul style="list-style-type: none"> <li>• Enforcement actions such as monetary penalty in the event of a serious breach.</li> <li>• Reputational damage and loss of public trust in NISRA.</li> </ul> <p><u>Compliance Risk:</u></p> <ul style="list-style-type: none"> <li>• Non-compliance with data protection legislation</li> <li>• Non-compliance with the Privacy and Electronic Communications Regulations (PECR)</li> <li>• Non-compliance with the Human Rights Act (1998).</li> </ul>			
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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)
<b>1</b>	<p><b>Personal data may not be processed lawfully, fairly and in a transparent manner</b></p> <p>NISRA have a lawful basis for processing personal data under the Data Protection Act 2018<sup>3</sup> and adhere to the six data protection principles of the Act. All data gathered by</p>	<i>Reduced</i>	<i>Low</i>	Yes - The proposed solution is considered as justified, compliant and proportionate response to the aims of the project.

<sup>3</sup> <http://www.legislation.gov.uk/ukpga/2018/12/contents/enacted>

	<p>Census Office is processed under the Census Act (Northern Ireland) 1969.</p> <p>As a registered Data Controller NISRA will always obtain consent from the data subject before using their personal data gathered in the 2019 census rehearsal and the 2021 Census.</p>			
<b>2</b>	<p><b>Personal data may not be collected for specified, explicit and legitimate purposes</b></p> <p>All data collected during the census by Census Office is done so under the Census Act (Northern Ireland) 1969.</p> <p>There are no new purposes identified outside the current scope of the project. All data collected will be used for the initial identified purpose only.</p>	<i>Reduced</i>	<i>Low</i>	Yes - The proposed solution is considered as justified, compliant and proportionate response to the aims of the project.
<b>3</b>	<p><b>Personal data may not be adequate, relevant and limited to what is necessary</b></p> <p>Questions have been designed and ordered in such a way to return relevant and adequate information for the purpose of the census.</p> <p>All of the personal data gathered through the census has been deemed to be essential; a) to reflect the content of the 2021 Census b) the level of detail is required to ensure objectives are met.</p>	<i>Reduced</i>	<i>Low</i>	Yes - The proposed solution is considered as justified, compliant and proportionate response to the aims of the project.

<p><b>4</b></p>	<p><b>Personal data may not be accurate and, where necessary, kept up to date</b>          Within each household the questionnaire asks individuals to complete the form e.g. Person 1, Person 2. This ensures accurate data is obtained from each required individual.</p> <p>Information is treated as accurate at time of collection. If an individual's circumstances change resulting in a change to their personal data, this does not have an impact on the data collected through the census.</p>	<p><i>Reduced</i></p>	<p><i>Low</i></p>	<p>Yes - The proposed solution is considered as justified, compliant and proportionate response to the aims of the project.</p>
<p><b>5</b></p>	<p><b>Personal data may not be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the data is processed</b>          All personal data will be held in line with the DoF retention and disposal schedule and as per the Census Act (Northern Ireland) 1969.</p>	<p><i>Reduced</i></p>	<p><i>Low</i></p>	<p>Yes - The proposed solution is considered as justified, compliant and proportionate response to the aims of the project.</p>
<p><b>6</b></p>	<p><b>Personal data may not be processed in a manner that ensures appropriate security of the personal data</b>          Data is collected and processed by only contracted or NISRA Census Office staff who have signed a Census Confidentiality Undertaking. The signees of the undertaking agree to abide by the specified statutory and ethical obligations. All individuals working on the 2021 Census, in England and Wales or in Northern Ireland, are subject to confidentiality requirements set out in the Statistics and</p>	<p><i>Reduced</i></p>	<p><i>Low</i></p>	<p>Yes - The proposed solution is considered as justified, compliant and proportionate response to the aims of the project.</p>

	<p>Registration Service Act 2007, the Census Act (Northern Ireland) 1969 and Data Protection Legislation (including the General Data Protection Regulation and the Data Protection Act 2018). Breaching the provisions of this legislation is a criminal offence and could result in prosecution which, if found guilty, would mean the person would have a criminal record and be liable to a fine and/or up to two years imprisonment. Systems and businesses involved in the collection, transfer and storage of census data hold accreditation to appropriate standards.</p> <p>Systems and businesses have been accredited to the appropriate level to handle the sensitive data obtained in the census.</p> <p>Only aggregated data will be published (if at all). Validation and checks are carried out to ensure that data is not released in any way that along with other publically available data, may identify a person.</p>			
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<b>STEP 7 APPROVAL PROCESS</b>		
	<b>Name/Date</b>	<b>Notes</b>
Measures approved by:	<b>Sandy Fitzpatrick</b> <b>30 September 2019</b>	Integrate actions back into project plan, with date and responsibility for completion
Residual risks approved by:	<b>Sandy Fitzpatrick</b> <b>30 September 2019</b>	If accepting any high residual risk, consult the ICO before going ahead
DPO advice provided:	<b>Jenny Lynn</b> <b>7 October 2019</b>	DPO should advise on compliance, Step 6 measures and whether processing can proceed
Summary of DPO advice: Content with the DPIA, bar one comment.		
DPO advice accepted/overruled by:	<b>Accepted</b>	If overruled, you must explain your reasons below
Comments Suggested amendment made 07/10/2019		
Consultation responses reviewed by:	<b>Census Office team</b>	If your decision departs from individuals' views, you must explain your reasons below
Comments		
This DPIA will be kept under review by:	<b>Census Office team/IAO</b>	The DPO should review ongoing compliance with the DPIA

## Appendix A

### Census Household Questionnaire

#### Questions:

- 1) What is your name?
- 2) What is your date of birth?
- 3) What is your sex?
- 4) What is your marital or civil partnership status?
- 5) Are you a schoolchild or student in full-time education?
- 6) During term time, where do you usually live?
- 7) What is your country of birth?
- 8) What year did you come to live in Northern Ireland?
- 9) One year ago, what was your usual address?
- 10) What passports do you hold?
- 11) How would you describe your national identity?
- 12) What is your ethnic group?
- 13) What religion, religious denomination or body do you belong to?
- 14) What religion, religious denomination or body were you brought up in?
- 15) What is your main language?
- 16) How well can you speak English?
- 17) Can you understand, speak, read or write Irish?
- 18) Can you understand, speak, read or write Ulster-Scots?
- 19) How is your health in general?
- 20) Are your day-to-day activities limited because of a health problem or disability which has lasted, or is expected to last, at least 12 months?
- 21) Do you have any of the following conditions which have lasted, or are expected to last, at least 12 months?
- 22) Do you look after, or give help or support to, anyone because they have long-term physical or mental health conditions or illnesses, or problems related to old age?

(Questions 24-43 for 16 years old and over)

- 23) Are you aged over 16?
- 24) Which of the following best describes your sexual orientation?
- 25) Have you achieved a qualification at degree level or above?
- 26) Have you achieved any other qualifications?
- 27) Have you completed an apprenticeship?
- 28) In the last seven days, were you doing any of the following? (employment related)
- 29) Which of the following describes what you were doing in the last seven days? (e.g. retired, studying)
- 30) In the last four weeks, were you actively looking for any kind of paid work?
- 31) If a job became available now, could you start it within two weeks?
- 32) In the last seven days, were you waiting to start a job already accepted?
- 33) Have you ever done any paid work?
- 34) Placeholder statement
- 35) In your main job, what is (was) your employment status?



# census 2021

- 36) What is (was) the name of the organisation or business you work (worked) for?
- 37) What is (was) your full time job title?
- 38) Briefly describe what you do (did) in your main job.
- 39) What is (was) the main activity of your organisation, business or freelance work?
- 40) Do (did) you supervise or oversee the work of other employees on a day-to-day basis?
- 41) In your main job, how many hours a week do (did) you usually work?
- 42) What is the name and address of your main place of work or course of study (including school)?
- 43) How do you usually travel to your main place of work or study (including school)?
- 44) Placeholder statement

**Appendix B**

**Department of Finance**

**DATA PROTECTION IMPACT ASSESSMENT CHECKLIST**

*Use this checklist to ensure all aspects of the GDPR process have been covered. Please consult the DoF Data Protection Officer throughout the process but particularly around the identification of risks and evaluation of privacy solutions.*

<b>CHECKLIST</b>	
DPIA screening exercise completed	<input checked="" type="checkbox"/>
Full DPIA required? If yes, continue below	Y
Rationale for DPIA identified	<input checked="" type="checkbox"/>
Processing (information flow) clearly described	<input checked="" type="checkbox"/>
Data subjects/other stakeholders identified and consulted	<input checked="" type="checkbox"/>
Privacy risks identified and documented	<input checked="" type="checkbox"/>
Privacy solutions evaluated and documented	<input checked="" type="checkbox"/>
Privacy solutions approved	<input checked="" type="checkbox"/>
Implementation plan in place for solutions and actions arising	<input checked="" type="checkbox"/>
DPIA report finalised and signed off	<input checked="" type="checkbox"/>
Details of DPIA entered on DSA/DPIA register	<input checked="" type="checkbox"/>
Privacy risks recorded in business area's risk register	<input checked="" type="checkbox"/>
DoF/business area privacy notice reviewed/revised	<input checked="" type="checkbox"/>
DoF Information Asset Register reviewed/revised	<input checked="" type="checkbox"/>
Appropriate data sharing arrangements in place where data is shared with third parties	<input checked="" type="checkbox"/>