

DPIA

This template is an example of how you can record your DPIA process and outcome. It follows the process set out in the ICO's DPIA guidance, and should be read alongside that guidance and the [Criteria for an acceptable DPIA](#) set out in European guidelines on DPIAs.

You should start to fill out the template at the start of any major project involving the use of personal data, or if you are making a significant change to an existing process. The final outcomes should be integrated back into your project plan.

Submitting controller details

Name of controller	Department for Infrastructure
Subject/title of DPIA	Consultation on Draft Social and Environmental Guidance for Price Control 28 (PC28, 2028/29 – 2032/33)
Name of controller contact	Michael Armstrong, Grade 7, Water Quality Policy Branch

Step 1: Identify the need for a DPIA

Explain broadly what project aims to achieve and what type of processing it involves. You may find it helpful to refer or link to other documents, such as a project proposal. Summarise why you identified the need for a DPIA.

The draft Social and Environmental Guidance ('the Guidance') outlines policies set out in Sustainable Water - A Long-Term Water Strategy for Northern Ireland (2015-2040), which was published in 2016.

This principal aim of the guidance prepared by the Department for Infrastructure's Water and Drainage Policy Division is to provide the Utility Regulator (UR) for Northern Ireland with guidance on the key environmental and social policies it expects it to have regard to in carrying out its role in regulating the water industry during the 2028/29-2032/33 period (PC28).

The guidance has been developed taking existing policies and legislative commitments into consideration and sets out the key strategic investment themes for NI Water for Price Control (PC) 28 which are:

- environmental improvement and compliance;
- service delivery, improvement and affordability; and
- sustainability and climate change.

Per Article 7(1) of the Water and Sewerage Services (Northern Ireland) Order 2006, the Department may issue guidance to the Utility Regulator on how it may contribute to the attainment of social and environmental policies in the exercise of its water and sewerage functions with respect to NI Water. The Utility Regulator shall, per Article 7(3) of the Order, have regard to the guidance issued by the Department.

In line with the approach taken with guidance issued for previous Price Control periods, the draft Guidance will be published for public consultation. NICS guidance on policy consultations recommends consideration of a DPIA as part of the consultation process.

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 might find it useful to refer to a flow diagram or other way of describing data flows. What types of processing identified as likely high risk are involved?

The guidance and related assessments/screening exercises will be published on the Departmental website, with a consultation questionnaire hosted on Citizen Space to collect feedback on the draft guidance. A summary of the consultation responses will be collated based on data held on Citizen Space. No personal data is included in the draft Guidance or requested from consultees as part of the consultation, with questions asking respondents to clarify if they are responding as an individual or as an organisation, and if the latter to clarify the organisation they represent.

The consultation questions focus on gathering feedback on the three key themes outlined above, while providing consultees with the opportunity to add any further comments on the draft Guidance and/or the assessments prepared for the guidance.

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

No personal data is requested from consultees and so no special category personal data or data concerning criminal convictions and offences is proposed to be processed.

While the guidance relates to policies that affect all of Northern Ireland, no processing of personal data is proposed and so individuals as data subjects are not affected by the proposed processing activity (public consultation on the draft Guidance).

Describe the context of the processing: 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? Is it novel in any way? What is the current state of technology in this area? Are there any current issues of public concern that you should factor in? Are you signed up to any approved code of conduct or certification scheme (once any have been approved)?

Per the above, no processing of personal data is proposed as part of the processing activity. Neither the draft Guidance nor the consultation exercise impact on individuals as data subjects.

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 you, and more broadly?

Per the above, no processing of personal data is proposed as part of the processing activity. The Guidance, once finalised, will assist the Utility Regulator in exercising their functions during the next Price Control period, with resultant benefits for service users. As outlined above, however, neither the draft Guidance nor the consultation exercise impact on individuals as data subjects.

Step 3: Consultation process

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 your organisation? Do you need to ask your processors to assist? Do you plan to consult information security experts, or any other experts?

The consultation process will include publication of relevant assessments, including this assessment, with the consultation questionnaire providing consultees with the opportunity to provide feedback specific to the assessments completed.

Step 4: Assess necessity and proportionality

Describe compliance and proportionality measures, in particular: 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 transfers?

The lawful basis for processing is outlined under Article 7(4) of the Water and Sewerage Services (Northern Ireland) Order 2006, which states that before issuing the Guidance to the Utility Regulator the Department shall consult with a set of specified stakeholders and any such persons the Department considers appropriate.

Data minimisation has been assured through the design of the consultation questionnaire, which does not request any personal data from consultees. Any incidental personal data provided by respondents will be managed in line with Departmental policies.

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	Severity of harm	Overall risk
Although no personal data is required or requested as part of this process, respondents may provide personal data in their responses to the consultation. Any such data will be managed in line with Departmental policies and will not form part of the consultation analysis.	Remote	Minimal	Low

Step 6: Identify measures to reduce risk

Identify additional measures you could take to reduce or eliminate risks identified as medium or high risk in step 5

Risk	Options to reduce or eliminate risk	Effect on risk	Residual risk	Measure approved
N/A	No medium or high risks identified.	N/A	N/A	N/A

Step 7: Sign off and record outcomes

Item	Name/position/date	Notes
Measures approved by:	Michael Armstrong Head of Water Quality Branch 29/7/26	Integrate actions back into project plan, with date and responsibility for completion
Residual risks approved by:	N/A	If accepting any residual high risk, consult the ICO before going ahead
DPO advice provided:	Donal Shearer Information Management Unit 3/8/26	DPO should advise on compliance, step 6 measures and whether processing can proceed
Summary of DPO advice: Content given that the DPIA states there is no collection of any Personal Information, for the DPIA to be stored in Content Manager along with the project files for future reference. This DPIA should be reviewed in six to twelve months in case anything has changed in relations to Personal details being collected. IMU to be contacted in the event of any changes.		
DPO advice accepted or overruled by:	Accepted Michael Armstrong Head of Water Quality Branch 3/8/26	If overruled, you must explain your reasons
Comments: N/A – advice accepted.		
Consultation responses reviewed by:	To be updated following completion of public consultation.	If your decision departs from individuals' views, you must explain your reasons

Comments:		
This DPIA will kept under review by:	Michael Armstrong Head of Water Quality Branch	The DPO should also review ongoing compliance with DPIA