

NORCE Research AS – EDPB

Consultation on DPIA Template (2026)

1. General remarks

NORCE welcomes the initiative to develop a harmonised DPIA template across the EU/EEA. A common structure can support consistency, comparability and accountability.

However, based on our assessment, the proposed template is detailed and may be challenging to apply in practice.

2. Main observations

2.1 Risk of overly formal (“checklist”) approach

The level of detail and structure of the template creates a risk that DPIAs become a formal documentation exercise rather than a substantive assessment of risks to individuals.

Recommendation:

- Emphasise analytical assessment over exhaustive documentation
- Allow flexibility in how requirements are documented

2.2 Need for proportionality

The template applies a high level of detail across all use cases, regardless of risk or complexity. This may be disproportionate and resource-intensive in practice.

Recommendation:

- Introduce a clearer risk-based approach (e.g. simplified vs. full DPIA)

2.3 Need for better adaptation to research contexts

From a research perspective, the template appears insufficiently adapted to key characteristics such as evolving purposes, secondary use of data, and uncertainty in early project phases.

Recommendation:

- Provide guidance specific to scientific research (Article 89 GDPR)
- Clarify how to assess compatibility for secondary use

2.4 Practical usability

The template is comprehensive but may be difficult to implement due to extensive table structures and overlap with existing governance and risk frameworks.

Recommendation:

- Allow references to existing documentation
- Reduce duplication across sections
- Clarify expected level of detail

3. Conclusion

NORCE supports the objective of harmonising DPIA practices.

To improve usability and relevance, we recommend:

- greater flexibility and proportionality
- avoiding a checklist-driven approach
- better adaptation to research and innovation contexts

These adjustments would help ensure that DPIAs remain an effective tool for risk assessment in practice.