
Public Consultation: DPIA Template

The DPIA template and its accompanying explainer represent a valuable step towards harmonisation and improved accountability. A few targeted adjustments could further enhance their usability and practical effectiveness.

First, given the level of detail, it may be helpful to consider a more scalable or modular approach, allowing the template to be more easily adapted to different types of organisations and processing activities.

Second, while international data transfers are addressed across different sections, introducing a more structured approach could improve clarity. In particular, further guidance on mapping transfers, integrating Transfer Impact Assessments (TIA), and identifying relevant transfer tools and safeguards would be beneficial.

Third, the flexibility provided regarding risk assessment methodology is useful. At the same time, including some high-level references or minimum criteria could support greater consistency and comparability across DPIAs.

Fourth, the template includes some intentional overlap to ensure traceability. Clarifying how existing GDPR documentation (such as records of processing activities or security documentation) can be reused or referenced could help reduce duplication in practice.

Fifth, the encouragement to involve data subjects or their representatives is positive. Additional practical guidance on when and how this can be done would further support controllers in applying this aspect effectively.

Sixth, although the template already refers to automated processing and innovative technologies, a more explicit reference to AI-related considerations could help ensure alignment with evolving regulatory developments.

Seventh, the inclusion of a fully worked example DPIA, even in a simplified or anonymised form, could greatly support understanding and consistent implementation by illustrating the expected level of detail and approach.

Finally, it is particularly positive that the template clearly distinguishes the role of the Data Protection Officer, who is expected to provide advice and recommendations rather than carry out the DPIA itself. In practice, organisations may sometimes tend to assign the full responsibility for DPIAs to the DPO. The clarification provided by the template helps reinforce the independence of the DPO and the accountability of the controller, in line with the GDPR framework.

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