

DPIA starter for AI tools

A starter, not legal advice: the specific-to-AI prompts that make a DPIA real rather than generic. Complete with your DPO or adviser where one is required.

01 The processing, specifically

The ICO's recurring criticism of DPIAs is that they are generic. Name things.

Tool and tier (exact product, business/enterprise tier)

Personal data fields going in (names, finances, health, family, identifiers)

Whose data (clients, staff, third parties)

Purpose, in one honest sentence

Lawful basis, and why it holds

02 AI-specific risks

Training risk: is our data used to train? Evidence

Accuracy risk: what happens when output is wrong about a person?

Automated decision-making: does any decision have legal or similar effect? Where does a human genuinely decide?

Retention and deletion: vendor behaviour, our setting

International transfers, and the safeguard relied on

03 Measures and sign-off

Measures reducing each risk above

Residual risk accepted by (name, role, date)

Reviewed with DPO / adviser where required

Review date set (tool or use change triggers early review)