

AI Assessment DPIA FRIA Crosswalk: Working Decision and Evidence Worksheet

IG-Smart Governance & Assurance Intelligence — Companion to Asset 09 | Editable template | Edition 25 October 2026

Purpose: Cross-regime AI impact, DPIA and FRIA screening record.

How to use: One system dossier can support several assessments, but cannot merge their distinct trigger tests, decision authorities and legal conclusions.

Professional boundary: This is an original IG-Smart proposed working instrument, not a regulator-issued form, independent audit, legal opinion, clinical sign-off or automatic risk-acceptance system. Use appropriately qualified practitioners and actual applicable requirements. Store restricted client and patient information only in approved secure repositories; record safe evidence references, not secrets or raw data.

2026 EU AI Act date gate: Article 27 FRIA applicability depends on operator, system category and commencement. The current Commission timeline reports a planning date for applicable Annex III high-risk requirements of **2 December 2027**, not August 2026; distinguish preparation from a presently operative legal duty. Keep DPIA, FRIA and other AI/clinical assessments as separately determined and approved records. Source: <https://ai-act-service-desk.ec.europa.eu/en/ai-act/eu-ai-act-implementation-timeline>

A. Engagement / decision details

Field	Entry
System and version	_____
Operator / controller roles	_____
Use case and affected people	_____
Jurisdictions	_____
DPIA legal screening	_____
FRIA legal screening	_____
Sector safety screening	_____

Field	Entry
Risk/evidence crosswalk	_____
Open mandatory assessments	_____
Decision authority and change trigger	_____

B. Mandatory assurance gates and evidence checklist

For each gate specify an accountable human owner, a secure evidence reference, review outcome, any material exception and next action. **“Mandatory” here marks a proposed IG-Smart screening safeguard, not a universal legal requirement.** Actual mandatory duties must be confirmed separately.

ID	Control / decision question	Screening gate	Evidence ref	Review status	Exception / assumption	Owner	Date
A01	Identify system/ model and version	Yes	----	Not assessed	----	----	----
A02	Map provider, deployer and controller roles	Yes	----	Not assessed	----	----	----
A03	Determine UK/EU territorial scope	Yes	----	Not assessed	----	----	----
A04	Screen UK/EU GDPR DPIA requirements	Yes	----	Not assessed	----	----	----
A05	Screen EU AI Act FRIA applicability	Yes	----	Not assessed	----	----	----
A06	Screen clinical/sector safety duties	Yes	----	Not assessed	----	----	----
A07	Identify affected people and harms	Yes	----	Not assessed	----	----	----
A08	Document intended use and limitations	Yes	----	Not assessed	----	----	----

ID	Control / decision question	Screening gate	Evidence ref	Review status	Exception / assumption	Owner	Date
A09	Verify human oversight arrangements	Yes	----	Not assessed	----	----	----
A10	Test fairness, accuracy and robustness	Yes	----	Not assessed	----	----	----
A11	Record distinct legal findings	Yes	----	Not assessed	----	----	----
A12	Set authorised deployment decision	Yes	----	Not assessed	----	----	----
A13	Define monitoring and change triggers	Yes	----	Not assessed	----	----	----
A14	Evaluate supplier AI dependencies	No	----	Not assessed	----	----	----
A15	Evaluate sensitive data and transfers	No	----	Not assessed	----	----	----
A16	Document DPO / CSO professional advice	No	----	Not assessed	----	----	----

C. Evidence quality and limitations

Evidence source	Relevant legal entity, system and period	Source credibility / independence	Scope limitation	Reviewer conclusion	Action
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Evidence hierarchy: distinguish (1) assertion, (2) supplied document, (3) independently examined operation, and (4) verified remediation. Evidence confidence is contextual; it should not be combined into a fictional universal compliance percentage.

D. Expert challenge / procurement questions

- 1. Which legal assessments are mandatory and why?
- 2. What is the system role, classification and territory?
- 3. Is there a high-risk personal data processing scenario?
- 4. Does Article 27 FRIA apply to this deployer and system?
- 5. What patient/consumer harms sit beyond privacy?
- 6. Who can stop deployment when a mandatory assessment is incomplete?

Record responses and facts that need verification. Avoid accepting promotional, certification or supplier statements without checking entity, scope and relevance.

E. Exceptions, uncertainties and mandatory-stop record

Finding ID	Material uncertainty or gap	Consequence	Decision owner	Interim control	Closure evidence	Deadline	Status
01	_____	_____	_____	_____	_____	_____	OPEN
02	_____	_____	_____	_____	_____	_____	OPEN
03	_____	_____	_____	_____	_____	_____	OPEN

Escalation rule: If an applicable statutory duty, patient-safety requirement, material security safeguard or fundamental assurance boundary is unresolved, do not permit a favourable overall score to override it. Seek qualified review and an appropriately authorised decision.

F. One-page executive decision record

Business need and proposed decision: _____
Affected services and individuals: _____
Verified findings and source scope: _____
Uncertain / missing facts: _____

Legal, regulatory or safety review: _____
Options (including defer / redesign): _____
Controls and outstanding conditions: _____
Decision: PROCEED / CONDITIONAL / DEFER / REJECT (delete as appropriate)
Decision rationale and alternatives: _____
Approver with documented authority: _____
Specialist challenge / dissent: _____
Owner, due date and review triggers: _____

No automated sign-off: the companion Excel workbook contains illustrative review-status flags only. It cannot authorise a regulated, commercial or clinical decision.

G. Material-change and re-review triggers

- New applicable law, regulator interpretation or officially published standard.
- Material change to system, supplier, data, people, configuration or contracted service.
- Serious incident, unexpected test result, breach, safety signal or complaint.
- Evidence expiry, loss of relevant certification scope, or changed assurance limitations.
- Departure of an accountable officer, change in delegation or new risk tolerance.
- Overdue action, untested recovery or new dependency concentration.

Evidence source for this subject: <https://ai-act-service-desk.ec.europa.eu/en/ai-act/article-27>

Safe use and decision control

This is an original IG-Smart working aid, not an official statutory form or automated compliance verdict. Screening gates are prompts: establish their actual legal, clinical, contractual or organisational basis. A conditional decision does not authorise activity while a mandatory prerequisite remains unmet. Keep real evidence in approved access-controlled systems; use references rather than copying personal data or confidential records here.

Read with: [AI Impact Assessment & DPIA Crosswalk for Regulated Organisations](#).