

COMPLIANCE WORKING RECORD

DPIA screening and review record

DPIA complete for authorised review. 3 action-required and 0 unresolved findings.

Document control

Field	Value
Organisation	Northfield Services Ltd
Document type	Data protection impact assessment working document
Document reference	DPIA-2026-008
Jurisdiction	United Kingdom
Version	2026.08.07
Status	Ready for review
Classification	Compliance working record
Prepared by	Product and Privacy Review Group
Prepared on	21 August 2026
Rule pack	2026.08.07
Sources reviewed	7 August 2026
Generated	21 August 2026

Recorded matter

Field	Value
Organisation	Northfield Services Ltd
Reference	DPIA-2026-008
Owner	Product and Privacy Review Group
Summary	Proposed customer-risk scoring service combines account activity and support history to prioritise manual fraud review. No automatic account closure or pricing decision is made.
Jurisdiction	United Kingdom

Decision

DPIA complete for authorised review

A high-risk trigger is present and every supported assessment field has evidence.

- Have the responsible owner approve the DPIA.
- Monitor the recorded review triggers.

Screening

Check	Answer	Record status	Evidence
Systematic and extensive evaluation with significant effects	yes	recorded	The service scores customer behaviour at scale and affects review priority.
Large-scale special-category or criminal-offence data	no	Action required	The approved input schema excludes special-category and criminal-offence data.
Large-scale systematic monitoring of public areas	no	Action required	The service does not monitor publicly accessible areas.
Other processing likely to result in high risk	yes	recorded	Large-scale behavioural analysis and potential false positives create combined risk to people.

Assessment

Check	Answer	Record status	Evidence
Need, nature, scope, context and purposes described	yes	recorded	Purpose, fields, sources, recipients, retention, scale and manual decision boundary are recorded.
Relevant consultation recorded	yes	recorded	DPO advice, fraud-operations feedback and an accessibility review are recorded.

Check	Answer	Record status	Evidence
Necessity and proportionality assessed	yes	recorded	Less intrusive alternatives, minimisation, retention, lawful basis and rights handling are compared.
Risks to people identified and assessed	yes	recorded	Eight risks are assessed for likelihood, severity and affected groups.
Measures and owners recorded	yes	recorded	Human review, feature exclusions, testing, access controls and monthly outcome checks have owners.

Decision

Check	Answer	Record status	Evidence
High residual risk remains after measures	no	Action required	No high residual risk remains after the approved measures, subject to pre-launch validation.
Approval and review trigger recorded	yes	recorded	Review is triggered by new data fields, model changes or material outcome disparity.

Approval record

Decision owner	Decision	Date	Signature
Product and Privacy Review Group	To be approved	To be completed	To be completed

Assumptions

- The organisation and responsible owner supplied the recorded facts for reference DPIA-2026-008.
- No answer has been inferred from a blank or uncertain response.

Limitations

- This tool records the user's screening and assessment evidence. It does not decide whether processing is necessary, proportionate or lawful.
- If high residual risk remains, the organisation must consult the ICO before processing unless the risk is reduced.
- Sector-specific duties and processing outside the recorded scope require separate review.

Official sources

Source	Provision	Date	Link
UK Parliament: UK GDPR, Article 35	Data protection impact assessment	7 August 2026	https://www.legislation.gov.uk/eur/2016/679/article/35
UK Parliament: UK GDPR, Article 36	Prior consultation	7 August 2026	https://www.legislation.gov.uk/eur/2016/679/article/36
Information Commissioner's Office: When do we need to do a DPIA?		7 August 2026	https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/accountability-and-governance/data-protection-impact-assessments-dpias/when-do-we-need-to-do-a-dpia/
Information Commissioner's Office: How do we do a DPIA?		7 August 2026	https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/accountability-and-governance/data-protection-impact-assessments-dpias/how-do-we-do-a-dpia/