

DPIA AND INDIVIDUAL RIGHTS REQUEST LOG

Screening, the impact assessment form, and the log of requests from individuals

FORM AND LOG — COMPANY FILE

KD-PQ-DI-012 Rev A0

UK GDPR Article 35: where a type of processing — in particular using new technologies, and taking account of its nature, scope, context and purposes — is likely to result in a high risk to people's rights and freedoms, the controller assesses its impact on the protection of personal data before the processing starts. An assessment is required in particular for a systematic and extensive evaluation of people based on automated processing, including profiling, on which decisions with legal or similarly significant effects are based; for large-scale processing of special category data or criminal offence data; and for systematic monitoring of a publicly accessible area on a large scale (Art 35(3)). The Information Commissioner publishes a list of further kinds of processing that need one (Art 35(4)) — check it. The assessment contains at least a systematic description of the processing and its purposes, including any legitimate interest; an assessment of necessity and proportionality; an assessment of the risks to people; and the measures to address them (Art 35(7)). The data protection officer's advice is sought where one is designated (Art 35(2)); the views of the people affected where appropriate (Art 35(9)); and the assessment is revisited at least when the risk changes (Art 35(11)). Where it shows the processing would result in a high risk without the controller's measures to reduce it, the controller consults the Commissioner before processing (Art 36(1)). Requests from individuals: see section 4 — the time limit is in Articles 12 and 12A, as amended by the Data (Use and Access) Act 2025 s.76, in force since 5 February 2026. The law applies across the UK. The data protection policy, privacy notice, record of processing and breach log are KD-PQ-DP-006.

CAS v5 Q168 — the screening decision and, where needed, the impact assessment (sections 2 and 3). CAS v5 Q169 — how requests from individuals are handled: section 4, the sign-off and the log. CAS v5 Q167 — the record of processing is held on KD-PQ-DP-006 section 3.

The question numbers are Build UK's; the descriptions are ours. This document records what the business does; the assessment body decides what it accepts. Version 6 of the question set is due on 1 November 2026 and is not yet published — check the numbers against the version you are assessed on. The independence statement is in the footer of every page.

1 THE BUSINESS AND THE PROCESSING

COMPANY LOGO add it in your PDF editor, or print and paste it here	BUSINESS NAME	COMPANY NO.	PEOPLE EMPLOYED	VERSION
	REGISTERED / TRADING ADDRESS	DATA PROTECTION LEAD		
	POLICY DATE	APPROVING DIRECTOR	POSITION	NEXT REVIEW DUE
	PROCESSING ASSESSED — NAME	DATA PROTECTION OFFICER	PLANNED START	DPIA REF

2 SCREENING — IS AN ASSESSMENT NEEDED?

Answer every question for the processing named above. Part A: a single "yes" means an assessment is required — the three cases in Article 35(3) and the kinds of processing the Information Commissioner lists under Article 35(4) as needing one on their own. Part B: a "yes" means an assessment is required when it is combined with any other "yes" on this sheet — the Commissioner's list treats these as high risk in combination. Where the only "yes" is a single Part B answer and you decide no assessment is needed, record why. Check the Commissioner's current list before relying on this sheet.

Part A — a single "yes" means an assessment is required

SCREENING QUESTION	YES / NO	WHY — WHAT IT INVOLVES
Evaluating or scoring people by automated processing, including profiling, with decisions that have legal or similarly significant effects? Article 35(3)(a) — e.g. automatic refusal of site access or work		
Special category or criminal offence data on a large scale? Article 35(3)(b) — health surveillance or drug and alcohol results across a large workforce; criminal record checks		
Systematic monitoring of a publicly accessible area on a large scale? Article 35(3)(c) — CCTV or number plate cameras covering streets and footpaths around sites		
Decisions about access to work, a site, a service or a benefit made using automated decision-making or special category data? e.g. a failed drug or alcohol test barring a person from site		
Combining, comparing or matching personal data from different sources? gate records matched with timesheets and telematics		
Could a breach put someone's physical health or safety at risk? home addresses of staff on a sensitive project; lone workers' live locations		
Profiling people on a large scale? e.g. scoring the behaviour of the whole workforce from site data		
Children's or vulnerable people's data used for marketing, profiling or automated decisions? e.g. apprentices under 18 scored by an app		

Part B — a "yes" means an assessment is required if there is any other "yes" on this sheet

SCREENING QUESTION	YES / NO	WHY — WHAT IT INVOLVES
New technology, or a new use of existing technology, including AI? body-worn cameras, drones over neighbours, AI analysis of camera footage, fatigue wearables		
Biometric data — fingerprints, face or hand geometry? fingerprint or face recognition at the site gate or in a clock-in app		
Tracking where people are or what they do? vehicle telematics, phone location, geofenced clock-in apps		

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SCREENING QUESTION	YES / NO	WHY — WHAT IT INVOLVES
Personal data not obtained from the people themselves, who will not be told directly? information bought or supplied by others		
People who are vulnerable or cannot easily refuse? young workers, apprentices, residents of occupied homes, patients		
Large scale — many people, much data, or a long period? every worker on every site, kept for years		

SCREENING RESULT	SCREENED BY	DATE	DPO / LEAD ADVICE

3 THE ASSESSMENT — ARTICLE 35(7)

DESCRIPTION — WHAT IS COLLECTED, FROM WHOM, WHERE IT IS HELD, WHO SEES IT, SUPPLIERS USED, HOW LONG IT IS KEPT

PURPOSES AND LAWFUL BASIS

NECESSITY AND PROPORTIONALITY — LESS INTRUSIVE OPTIONS, MINIMUM DATA, SECURITY, RETENTION, TELLING PEOPLE, RIGHTS

CONSULTATION — THE DPO OR LEAD'S ADVICE, AND THE VIEWS OF THE PEOPLE AFFECTED (OR WHY NOT SOUGHT)

RISK TO PEOPLE	LIKELIHOOD	SEVERITY	OVERALL	MEASURE TO REDUCE IT	EFFECT	RESIDUAL	AGREED BY

HIGH RISK REMAINS AFTER MEASURES?	COMMISSIONER CONSULTED — DATE / REF	DECISION	DECIDED BY — NAME, DATE

REVISIT BY / TRIGGERS

4 REQUESTS FROM INDIVIDUALS — WHAT TO DO

People can ask for a copy of their personal data and information about its use (access, Art 15); to have inaccurate data corrected or incomplete data completed (rectification, Art 16); for it to be erased where one of the grounds in Art 17 applies — for example it is no longer needed, or was processed unlawfully; for its use to be restricted, for example while its accuracy is checked (Art 18); to receive data they gave the business in a structured, machine-readable form where processing is by automated means and based on consent or contract (portability, Art 20); and to object to processing based on legitimate interests, and always to direct marketing (Art 21). Where a significant decision about a person is taken solely by automated processing, they must be told about it and be able to make representations, obtain human intervention and contest it (Arts 22A and 22C). Each right has conditions and exceptions in the law — check them before refusing.

Time limit (Arts 12 and 12A): act without undue delay and in any event within one month beginning with the latest of receiving the request, receiving any information asked for to confirm identity, and receiving any fee charged. The month can be extended by two further months where needed because of the complexity or number of the person's requests — only by a notice giving the reasons, sent within the first month. For an access request, the time spent waiting for information reasonably needed to find what the person is asking about does not count. Responses are free, unless a request is manifestly unfounded or excessive, when a reasonable fee may be charged or the request refused — the business must be able to show why. If no action is taken, tell the person why, and that they can complain to the business, complain to the Information Commissioner, or go to court, within the same time limit.

REQUESTS HANDLED BY	REQUESTS RECEIVED AT	IDENTITY CHECK USED

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5 RESPONSIBILITY, COMMUNICATION AND MONITORING

ROLE	NAME	WHAT THEY DO UNDER THIS POLICY

Evidence that the policy reached people: record each induction, briefing and issue on KD-CAS-PB-005 Policy Briefing and Acknowledgement Record — names, dates and signatures. Assessors ask for that record, dated within the last twelve months; only briefing people creates it.

HOW THE POLICY IS COMMUNICATED

HOW IT IS MONITORED, AND WHAT TRIGGERS AN EARLY REVISION

6 SIGNED FOR THE BUSINESS

I adopt this screening procedure, impact assessment form and individual rights procedure for the business named in section 1, and I will make sure they are used before new processing starts and whenever a request arrives.

SIGNED — PRINTED NAME	POSITION	SIGNATURE	DATE	NEXT REVIEW DUE

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Enter every request the day it arrives, however it arrives — email, letter, phone, a word to a site manager. Work out the due date from the latest of receipt, identity confirmed and fee paid. This is the one log for individual rights requests: a business that also holds KD-PQ-DP-006 uses it instead of the request lines in that document's section 5 log, which then records only complaints and personal data breaches.

LOG KEPT BY

LOG STARTED

REF	RECEIVED	REQUESTER	RIGHT	ID CHECKED	DUE BY	EXTENDED?	SENT	OUTCOME	CLOSED
SAMPLE									

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R REVISION HISTORY

Every revision of this document, and every review that found nothing to change. The revision on the front of this sheet is the one you are holding — check kubitdocs.com for the current one before use.

Rev	Date	Class	What changed	Authorised by
D0	2026-09-13	first-issue	First issue.	— not yet approved —
A0	2026-09-13	review	Approved for issue by the author. Content unchanged from the reviewed draft; the draft status strip is removed. No independent third-party review has been carried out.	Author — director, UK principal contractor, SMSTS. Not an independent review.

Class: first-issue · material (the law, a control, a field or the scope changed — past buyers are notified) · editorial (wording or layout only) · review (checked, nothing changed) · withdrawal. Revision prefix D = draft, not approved and not for sale; A = approved for issue by the person named, on the date shown.