TEMPLATE P48 · FUNDAMENTAL RIGHTS IMPACT ASSESSMENT

Fundamental rights impact assessment

Documents the fundamental rights impact assessment that the AI Act requires of certain deployers of high-risk systems before first use, and prepares its notification to the market surveillance authority.

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> *This template does not constitute legal advice.* References consulted in September 2026; the obligation applies with the high-risk obligations of Annex III (2-12-2027 following Regulation (EU) 2026/1744). Verify that they are current (document 34 §3.1 and §3.10).

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> **Why it matters.** A high-risk system that decides on credit, insurance or access to public services can harm entire groups without any economic indicator showing it. This assessment requires the company to describe, before first use, the processes in which the system will be used, whom it affects, what harm it may cause and what the company will do if that harm materialises; without it the system cannot lawfully be deployed in the cases where it is mandatory and *gate* G5 cannot be passed. Carried out from the design stage, it also avoids late redesigns.

01

Instructions for use

Aspect	Guidance
When it is used	It is opened when P11 §9.2 concludes that the assessment is **Required**, or **Recommended** and the company decides to carry it out. It is prepared in phase 3, updated in phase 4 with the design, notified before G5 and reviewed in phase 5, at every R6 and whenever any of its elements changes (Article 27.2).
Who completes it	The AI Risk Owner, with the second line (legal counsel and compliance) and the AI Product Owner (34 §3.10). The business area that will use the system describes the processes.
Who verifies it	Lite: AI Office or AI Auditor. Enterprise: AI Auditor. In practice, high-risk systems are always Enterprise.
Who decides or approves	AI Committee; acceptance of the residual risk, according to P12 §6.
Gate or moment	Feasibility (determined and started, G3.09); G4 · Design (completed and measures in the design, G4.13); G5 · Go-live (notified, G5.15); R6 (current, R6.08). (G3)
Tool	T07 · Regulatory classifier (status, date, link and notification date, 32 §3.5).
Reference document	32 §6.2, 34 §3.10 and §8.2, document 33 (risk scales), document 50 §8 (decisions about people).
Lite versus Enterprise	When it is mandatory, all its content is mandatory. Every Enterprise use case with decisions about people **should** apply this content even if not obliged to (34 §3.10); in that voluntary use it may omit section 10.

Completion rules:

- **One assessment per high-risk system and per use.** If the same system (SIA-AAAA-NNN) is used in different processes, all of them are described.
- The assessment focuses on the **affected persons and groups**, not on the company. It relies on the information that the provider supplies with the instructions for use.
- **It complements, without duplicating,** the data protection impact assessment (P47): what is already recorded there is referenced (section 11).
- The AI Act provides for a European AI Office questionnaire for the notification: at the consultation date, the European AI Office template is pending confirmation (34 §3.10). When it becomes available, it is the notification format; **this SEVEN-G template does not replace it**: it serves to prepare the content, integrate it into the use case lifecycle and keep internal traceability.
- Voluntary use: it may rely on ISO/IEC 42005:2025 (32 §6.2).

02

Identification

Field	Content	Guidance
Use case code		IA-AAAA-NNN.
System code and name		SIA-AAAA-NNN from P05 (T02).
System provider		Internal or third party (P14).
Intended purpose		Copy from P05 and P11.
Classification and Annex III point		From P11 §6.2 (for example, 5.b or 5.c).
Company role		Deployer (and, where applicable, also provider).
Reference to P11		Version and date.
Reference to P47		If there is a DPIA of the same processing.
Document version		
Date		DD-MM-AAAA.
Status		Draft · Submitted for verification · Approved · Notified · Under review · Superseded.

03

Applicability

Question	Answer	Justification
Is the system high-risk under Article 6.2 (Annex III) and not under point 2 (critical infrastructure)?	Yes · No	
Is the company a body governed by public law or a private entity providing public services?		
Is the system in Annex III, point 5, letter b) (creditworthiness or credit score) or letter c) (risk assessment and pricing in life and health insurance)?		
Result	Mandatory · Voluntary · Not applicable	Mandatory if the first answer is "Yes" and either of the other two is also "Yes".
Date from which it is required		With the Annex III obligations. SEVEN-G recommends carrying it out from the design stage (32 §6.2).

04

Processes in which the system will be used (Article 27.1.a)

Field	Content	Guidance
Deployer's processes		Description of each process in business language, in line with the intended purpose.
Decisions the system supports or takes		What it decides, what it recommends and what a person validates (P17 §5).
Autonomy level		A0–A3.
Excluded uses		Uses that are not permitted even if the system could perform them.

05

Period and frequency of use (Article 27.1.b)

Field	Content	Guidance
Planned date of first use		Date of G5.
Period of use		Indefinite with review at R6, or end date.
Frequency		Continuous, daily, on request, per campaign.
Volume		Decisions or persons assessed per period (order of magnitude).

06

Affected persons and groups (Article 27.1.c)

Category of persons or group	How the system affects them	Approximate volume	Vulnerable group?	Guidance
			Yes · No	By age, disability, economic or social situation, or other.
(illustrative example) **Applicants for personal loans**	Their score determines approval and price	Around 40,000 applications a year	Yes: people with a short credit history	

07

Specific risks of harm (Article 27.1.d)

Take into account the information provided by the provider (instructions for use) and assess with the **common scale** (document 33): **Level = Likelihood × Impact**; Low 1–4 · Medium 5–9 · High 10–15 · Critical 16–25. The dominant axis will usually be "People and rights". Risks of Medium level or above are carried over to P12.

No.	Risk of harm (cause, event and consequence)	Affected group	Right or interest affected	Inh. L	Inh. I	Inherent level	Measures (sections 8 and 9)	Residual level	Code in P12
F01				1–5	1–5				IA-AAAA-NNN · Rnn
F02									
***(illustrative example)* F01**	Variables that act as proxies for origin or age cause one group to receive lower scores and to be refused credit or charged more for it.	Applicants with a short credit history	Non-discrimination; access to essential services	3	4	12 High	Exclusion of proxy variables (P16); bias testing before the pilot and in production (P22, P25); human review of refusals (P17)	6 Medium	IA-2026-021 · R02

08

Human oversight measures (Article 27.1.e)

In accordance with the provider's instructions for use and the design in P17.

Field	Content	Guidance
Oversight modes		Prior validation · Real-time oversight · Sample-based ex post review · Aggregate oversight (P17 §6).
People who exercise oversight		Role, competence, training and authority (Article 26.2; P20).
Ability not to use, override or stop the system		P17 §7; kill switch (P18, P19).
Consistency with the provider's instructions for use		What the provider requires and how it is met.

09

Measures if the risks materialise (Article 27.1.f)

Field	Content	Guidance
Internal governance		Who decides to suspend or limit use, escalation and time limits (P26, document 30).
Complaint mechanisms		Channel, internal response time and reviewing role (P17 §8; P49).
Explanation of individual decisions		How requests are handled (Article 86; P49).
Redress for affected persons		Review of decisions already taken, correction and communication.
Information to the provider and the authorities		Monitoring and reporting of serious incidents (Article 26.5; P26, P27).

10

Notification to the market surveillance authority (Article 27.3)

Field	Content	Guidance
Competent authority		Identified in P11 (AESIA or sector authority; 34 §8.2).
Format used		The template provided by the European AI Office, when available; in the meantime, the one indicated by the authority.
Notification date		Before G5 (P23).
Reference or acknowledgement		
Update notifications		Date and reason for each update notified.

11

Relationship with the data protection impact assessment (P47)

Element	Already recorded in P47?	Reference or complement in this assessment
Description of the processing and the data	Yes · No	
Data protection risks		
Risks to other rights (non-discrimination, access to services, effective remedy, others)		Only in this assessment.
Common measures		

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Conclusion and review

Field	Content	Guidance
Highest residual level		From section 7.
Conclusion		The system may be deployed · May be deployed with conditions · May not be deployed.
Conditions		Measures that must be verified before G5.
Acceptance of the residual risk		Body according to P12 §6. A Critical residual without approval from the board or its board committee blocks G3 and G5.
Next review		Next R6 or change of process, group, frequency, provider or instructions for use (Article 27.2; P27).

Date	Reason	Changes	Residual level	Is the update notified?	Reviewed by
	R6 · Change · Incident `(phase 5)`			Yes · No	

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Quality criteria

The formal criteria are in document 21 (G3.09, G4.13, G5.15 and R6.08).

#	Check	Status
1	Applicability matches P11 §9.2 and is justified.	Met · Not met · Not applicable · Pending
2	The six elements of Article 27.1 are present: processes, period and frequency, affected persons, risks, human oversight and measures if risks materialise.	
3	The provider's information and instructions for use have been used.	
4	Risks are assessed with the common scale and those of Medium level or above are in P12.	
5	There is an operational complaint mechanism and explanation channel (P17, P49).	
6	The DPIA (P47) is reused without duplicating it.	
7	The notification to the authority is recorded before G5, with date and reference.	
8	It is current at the latest R6 and updates are notified.	

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Approval and verification

Function	Role in SEVEN-G	Name and position	Date	Signature or reference
Coordinates and prepares	AI Risk Owner			
Describes processes and oversight	AI Product Owner and business area			
Validates legally	Second line (legal counsel or compliance)			
Consulted	Data protection officer			
Verifies	AI Auditor			

Function	Role in SEVEN-G	Name and position	Date	Signature or reference
Approves	AI Committee; acceptance of the residual according to P12 §6			
☐ **Statement: "The organisation confirms that this assessment has been carried out with qualified advice and accepts responsibility for it; SEVEN-G is only a methodological reference."**	Same body that approves			

Segregation of duties: whoever prepares the assessment does not verify it; the area that will use the system does not accept its residual risk.

15

Version control

Completed document

Version	Date	Author	Changes

Template

Version	Date	Changes
0.1	19-09-2026	First version. Develops the assessment that P11 §9.2 declares necessary, with the elements of Article 27 set out in 32 §6.2 and 34 §3.10, the notification to the authority and the link with P47 and P12. References consulted in September 2026.

External sources cited

Links to the official or primary source, checked before publication. Always verify the version in force on the date of use.

Regulation (EU) 2024/1689 of the European Parliament and of the Council of 13 June 2024 laying down harmonised rules on artificial intelligence (Artificial Intelligence Act) · https://eur-lex.

europa.eu/eli/reg/2024/1689/oj/eng · Parlamento Europeo y Consejo de la UE · 13-06-2024

Regulation (EU) 2026/1744 of the European Parliament and of the Council of 8 July 2026 amending Regulations (EU) 2024/1689, (EU) 2018/1139 and (EU) 2023/1230 as regards the simplification of the implementation of harmonised rules on artificial intelligence (Digital Omnibus on AI) · https://eur-lex.europa.eu/eli/reg/2026/1744/oj/eng · Parlamento Europeo y Consejo de la UE · 08-07-2026

European AI Office (European Commission) · https://digital-strategy.ec.europa.eu/en/policies/ai-office · Comisión Europea (DG CONNECT)

Spanish Agency for the Supervision of Artificial Intelligence (AESIA) · https://aesia.digital.gob.es/es · Agencia Española de Supervisión de Inteligencia Artificial

ISO/IEC 42005:2025 Information technology — Artificial intelligence (AI) — AI system impact assessment · https://www.iso.org/standard/42005 · ISO/IEC (JTC 1/SC 42) · 28-05-2025