

Automated Decision-Making Policy

1. Document Control

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2. Purpose and Legal Basis

This policy establishes the definitive framework for any use of automated decision-making or profiling by the charity. It ensures that all such data processing is lawful, fair, transparent, and includes robust safeguards to protect the rights and freedoms of individuals. This policy is founded on the primary legal and regulatory requirements governing data protection and equality in the United Kingdom:

- The UK General Data Protection Regulation (UK GDPR), particularly Article 22, which grants individuals specific rights in relation to automated decision-making and profiling.
- The Data Protection Act 2018 supplements the UK GDPR.
- The Equality Act 2010 requires the charity to ensure that automated systems do not introduce or perpetuate discriminatory biases against any protected characteristic.
- The Data (Use and Access) Act 2025: To ensure forward-looking compliance with emerging principles of data re-use, grounding our approach in the UK GDPR's core principle of purpose limitation.

Having established the legal foundation, the following section defines the precise scope of this policy's application.

3.0 Scope

A clearly defined scope is strategically essential to ensure this policy is applied consistently to all relevant people and processes. This prevents ambiguity, safeguards the charity's operations and beneficiaries from the significant risks associated with automated systems, and ensures universal adherence to its principles.

Individuals Covered

This policy applies to all of the following individuals and groups associated with the charity:

- All Charity Trustees.
- Any future staff and volunteers engaged by the charity.
- All third-party contractors or service providers acting on behalf of the charity.

Activities Covered

This policy covers any processing of personal data that constitutes automated decision-making or profiling which could have a legal or similarly significant effect on individuals, with particular relevance to the beneficiaries as defined in the charity's constitution.

This comprehensive scope provides the foundation for the charity's formal commitment, which is articulated in the definitive policy statement that follows.

4.0 Policy Statement

This section contains the Board of Trustees' formal, high-level commitment to the principles that govern this policy. It sets the authoritative tone for the entire document and articulates the core values that guide the charity's approach to the use of automated systems.

The Board of Trustees formally commits to the following principles:

- Using automated decision-making and profiling only in a manner that is lawful, fair, transparent, and clearly communicated to the individuals affected.
- Prioritising meaningful human review for any decisions that have a significant impact on beneficiaries, such as the awarding of grants, provision of support, or determination of eligibility for services.
- Implementing robust and accessible safeguards to protect the rights and freedoms of individuals, including the right to obtain human intervention,

express their point of view, and contest a decision made by an automated system.

- Prohibiting the use of automated systems that result in unlawful discrimination contrary to the Equality Act 2010.

To ensure the consistent and correct application of this statement, the following section provides unambiguous definitions for the key terms used.

5.0 Definitions

To ensure clarity and consistent understanding, this section defines the key technical and legal terms used throughout the policy, tailored to the specific context of the charity's operations.

Term	Definition
Automated Decision Making	The process of making a decision by automated means without any human involvement. For the charity, this could relate to initial eligibility screening for financial assistance or support services.
Profiling	Any form of automated processing of personal data to evaluate certain personal aspects of an individual, such as analysing or predicting aspects of their health, personal preferences, or economic situation.
Meaningful Human Review	A review of an automated decision carried out by someone with the authority and competence to change the decision, who has considered all relevant input and output data. This must be more than a token gesture.
Special Category Data	Personal data which the UK GDPR says is more sensitive, and so needs more protection. This includes information about an individual's health, which is a core part of the data the charity processes to fulfil its objects.

These definitions underpin the practical, operational procedures required to implement this policy effectively.

6.0 Procedures

This section provides the core operational guidance for the policy. These procedures translate the policy's principles into mandatory, actionable steps for all individuals covered by its scope, ensuring a consistent and compliant approach to managing automated systems.

Prohibition on Solely Automated Decisions

The charity will not make decisions based solely on automated processing which produces legal or similarly significant effects on individuals, unless such a decision is:

- Necessary for entering into, or the performance of, a contract between the individual and the charity;
- Authorised by UK law to which the charity is subject; or
- Based on the individual's explicit consent.

Data Protection Impact Assessment (DPIA)

A Data Protection Impact Assessment (DPIA) must be completed and formally approved by the Board of Trustees before the charity procures or implements any new system that involves automated decision-making or profiling of personal data.

The effective execution of these procedures depends on a clear and unambiguous allocation of specific roles and responsibilities.

7.0 Roles and Responsibilities

Clear accountability is vital for effective governance. This section delineates the specific responsibilities of key roles within the charity to ensure this policy is implemented, managed, and overseen correctly, leaving no gaps in accountability.

Board of Trustees The Board of Trustees holds ultimate accountability for this policy and for the charity's overall compliance with UK GDPR. The Board is responsible for formally approving any Data Protection Impact Assessment (DPIA) related to the use of automated systems.

Data Protection Officer (DPO) / Designated Lead The DPO is responsible for providing expert advice and guidance to the Board on the use of automated decision-making and profiling. They will guide the DPIA process and act as the primary point of contact for individuals wishing to exercise their rights in relation to an automated decision.

All Trustees, Volunteers, and Contractors All individuals covered by this policy are responsible for understanding and complying with its principles. They have a duty

to alert the DPO before procuring, developing, or implementing any new system that may involve automated decision-making or profiling.

These defined roles and responsibilities are brought to life through a clear and structured plan for the policy's implementation.

8.0 Implementation

A policy is only effective when it is formally adopted and embedded into the charity's operations. This section outlines the formal plan for ensuring this policy is communicated, understood, and followed by all relevant individuals.

- **Adoption:** This policy is effective immediately upon its formal adoption by a resolution of the Board of Trustees.
- **Communication:** This policy will be communicated to all individuals identified within its scope. A summary of the safeguards relating to automated decision-making will also be made available to beneficiaries and the public via the charity's Privacy Policy.
- **Training:** Specific training on the requirements of this policy and the risks of automated systems will be provided to any individual involved in designing, procuring, or operating systems that use automated decision-making.

The ongoing effectiveness of this implementation plan will be ensured through a regular monitoring and review process.

9.0 Monitoring and Review

Systematic monitoring and review are essential to ensure this policy remains legally compliant, effective in practice, and relevant to the charity's evolving activities.

- **Annual Review:** This policy will be formally reviewed by the Board of Trustees at least annually to ensure its continued relevance and effectiveness.
- **Triggers for Earlier Review:** An unscheduled review will be triggered by significant changes in relevant legislation (e.g., the Data (Use and Access) Act 2025), a data breach or other relevant incident involving an automated system, or the introduction of new high-risk processing activities.
- **Reporting:** The DPO will provide a formal report to the Board of Trustees at least annually on the policy's implementation and any relevant activities, risks, or requests from individuals.

To ensure a cohesive governance approach, this policy must be read in conjunction with the related documents that form the charity's integrated data protection framework.

10.0 Related Policies and Documents

This policy operates as part of an integrated governance framework and should not be read in isolation. To ensure a comprehensive and consistent approach to data protection and risk management, it must be read in conjunction with the following key documents:

- Overall Data Protection Policy (ORG/DP/009)
- Data Protection Impact Assessment (DPIA) Policy (ORG/DP/011)
- Data Subject Rights Policy (ORG/DP/010)
- Lawful Basis Policy (ORG/DP/003)
- Privacy Policy (ORG/DP/007)
- Risk Management Policy (ORG/GOV/002)