

Human Oversight and Transparency Checklist — Anonymised Sample

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Anonymised — Do not redistribute. Excerpt from a Documentation Sprint deliverable. The customer "Acme Decisions Ltd" and the AI system "AcmeMatch" are illustrative.

Customer: Acme Decisions Ltd · **AI System:** AcmeMatch v3.4 (high-risk, Annex III §4(a)) · **Checklist version:** 1.0 · **Last review:** 2026-04-25

Purpose

This checklist demonstrates AcmeMatch's compliance with **EU AI Act Article 14** (Human oversight) and **Article 13** (Transparency and provision of information to Deployers). It supports the Provider's Annex IV technical documentation §4 and underpins the Deployer's Article 26 obligations.

The checklist is binary: each item is either Yes (fully implemented), Partial (implemented with named exception), or No (with remediation plan and target date).

1. Article 14 — Human oversight by design

1.1 Oversight is built into the system itself, not bolted on after

#	Control	Status	Evidence reference
1	The recruiter cannot move a candidate to the interview stage without affirmatively selecting that candidate	Yes	UI behaviour test report 2026-04-12; log evidence in CTRL-003
2	Every shortlist surface includes a clearly labelled "override and re-rank" control	Yes	UI screenshot pack 2026-04-12; CTRL-001
3	Every candidate row has an "explain this rank" link that opens a per-candidate model card	Yes	UI screenshot pack 2026-04-12; CTRL-002
4	The system never auto-sends communications to candidates (no auto-reject, no auto-invite)	Yes	Architecture review 2026-03-20 confirmed; no outbound message path
5	The recruiter sees a clearly labelled "AI-ranked shortlist" indicator on every relevant screen	Yes	UI design system tokens v3.4

1.2 Oversight is *meaningful*, not nominal

#	Control	Status	Evidence reference
6	The recruiter receives onboarding training on AcmeMatch's limitations, including known bias patterns and the prohibition on using AcmeMatch as the sole basis for adverse decisions	Yes	Deployer Onboarding Module v3.4; signed acknowledgement on first login
7	The Deployer Use Manual contains an "AcmeMatch is not a hire/no-hire decision tool" disclosure on every page header	Yes	Deployer Use Manual v3.4 §1, §2, §3
8	An "anomalous override pattern" alert fires if a recruiter overrides AcmeMatch in less than 5% of shortlists across 50 consecutive shortlists	Yes	CTRL-007; weekly anomaly report
9	A "rubber-stamp" pattern detection metric is reviewed quarterly at the Provider's risk-management governance review	Yes	Quarterly risk review template
10	The Deployer can disable AcmeMatch's ranking and revert to chronological order without contacting the Provider	Yes	Per-tenant feature toggle

1.3 Recruiter receives all information needed to interpret a ranking

#	Control	Status	Evidence reference
11	Every ranked candidate has at least 3 plain-language rationale tags ("7+ years SaaS sales", "managed quota >£500k", etc.)	Yes	Sampled 200 production rankings 2026-04-10; 100% had ≥ 3 tags
12	The model card per candidate explains <i>what AcmeMatch did NOT consider</i> (e.g. "AcmeMatch did not consider name, age, gender, nationality")	Yes	Model card schema v3.4 §"Excluded features"
13	Confidence calibration is shown alongside each rank ("low confidence", "medium", "high"), with a documented threshold method	Yes	Calibration documentation in Annex IV §3.2
14	The recruiter can request an "alternative explanation" view that re-ranks the shortlist using a human-defined feature weighting	Yes	Feature live in v3.4.0; usage logged for audit

1.4 Stop-the-line authority

#	Control	Status	Evidence reference
15	The Deployer's compliance lead can pause AcmeMatch for a tenant within 1 business day of a written request	Yes	Documented in Provider's incident-response procedure §4.2
16	The Provider's incident channel (incident@example.com) is published in the Deployer Use Manual and on the Provider's status page	Yes	Deployer Use Manual v3.4 §"Incident reporting"

2. Article 13 — Transparency to Deployers

2.1 Documentation that must be provided to every Deployer

#	Item	Status
17	Instructions for use (Deployer Use Manual)	Yes
18	Description of intended purpose	Yes
19	Performance characteristics (target metrics, known limitations)	Yes
20	Pre-determined changes to the system (and how the Deployer is notified)	Yes
21	Data needed for the system to operate as intended	Yes
22	Human oversight measures the Deployer must enable	Yes
23	Conditions under which the system might pose risks (named bias and automation-bias risks)	Yes
24	Expected lifetime of the system and any maintenance, recalibration measures	Yes

2.2 Disclosure of AI nature to candidates (downstream transparency)

#	Item	Status	Evidence reference
25	The Deployer Use Manual instructs the Deployer to disclose AcmeMatch's role to candidates in the candidate-facing privacy notice	Yes	Deployer Use Manual v3.4 §"Candidate disclosure" + sample privacy notice clause
26	The Deployer Use Manual reminds Deployers of UK GDPR Article 14 / EU GDPR Article 14 disclosure obligations	Yes	Deployer Use Manual v3.4 §"GDPR alignment"
27	If a Deployer enables a "candidate FAQ page about AcmeMatch", the Provider supplies plain-language Q&A copy	Yes	Candidate FAQ template v3.4

3. Outstanding actions and named exceptions

3.1 Outstanding actions (target dates)

Item	Owner	Target date
Q2 bias audit (CTRL-005)	Head of ML	2026-06-30
Refresh Deployer Onboarding Module to cover UI changes in v3.5 (planned)	Head of Product	Before v3.5 release
External independent review of human-oversight design (Article 14 (4)(b) "person assigned with the necessary competence")	DPO + external counsel	2026-09-30

3.2 Named exceptions

None as of 2026-04-25.

Document control

Item	Detail
Sample produced	2026-04-25
Anonymised customer	Acme Decisions Ltd (fictional UK SME)
AI system in scope	AcmeMatch v3.4
Tier of artefact	Documentation Sprint (this checklist is a single deliverable; the full sprint pack also includes the Deployer Use Manual and per-tenant configuration playbook)
Reviewer	Customer's solicitor, DPO, or risk lead before external reliance

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