



Bonus toolkit · The AI Forward Broker

# The Broker AI Decision Map

A working document for broker MDs. Map every AI-influenced customer decision, who owns it, and how a customer contests it.

Maps to UK GDPR Articles 22A to 22D

Introduced by the Data (Use and Access) Act 2025

Prepared for UK general insurance brokers

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WHY THIS EXISTS

## Map the decision, not the software

The Data (Use and Access) Act 2025 replaced Article 22 of UK GDPR with new Articles 22A to 22D. The core automated decision-making rules came into force on 5 February 2026. A new statutory complaints-handling regime follows from 19 June 2026.

The old rule mostly banned solely automated decisions. The new rule does the opposite. It allows them for ordinary personal data, then attaches four duties to every significant one. The bar moved from "are you allowed to do this" to "can you prove a human can step in and a customer can push back".

For a broker that means one thing. When a customer asks how an AI-influenced decision about them was made, and challenges it, you answer on paper inside the statutory response clock. Not from memory. Not invented on the call.

This worksheet covers the four safeguards the new Article 22C attaches to any significant, solely automated decision based on personal data:

- Information about the decision
- The right to make representations
- The right to human intervention
- The right to contest

Plus the file you produce when a customer challenges or the ICO asks. Allow three to five working days to complete it properly. Half a day will not survive a question.



## Be specific. Vague answers fail.

- One pass with your DPO or equivalent, your IT lead, and the SMF who will own automated decision-making risk.
- Be specific. Name the decision, name the tool, name the person, name the route.
- Map decisions, not tools. The unit of work here is the customer decision. One tool can sit behind five decisions.
- Where you cannot answer, write "gap" and add it to the action log at the bottom.
- Review quarterly. Refresh fully before each renewal cycle and the moment a new AI-influenced decision goes live.

### KEY TERMS

#### The terms used through this worksheet

Term	What it means here
DUAA	The Data (Use and Access) Act 2025. Replaced Article 22 of UK GDPR with Articles 22A to 22D. Core ADM rules in force 5 February 2026.
ADM	Automated decision-making. A decision made by automated means. Caught by the rules when it is solely automated and significant.
Article 22A	Defines two things: a decision is solely automated if there is no meaningful human involvement, and significant if it has a legal or similarly significant effect.
Article 22B	Restricts solely automated significant decisions that use special category data. Those still need explicit consent or a narrow legal route.
Article 22C	The four mandatory safeguards: information, representations, human intervention, contest. This is the spine of the worksheet.
Article 22D	Powers for the Secretary of State to add detail and further safeguards by regulation. The part most likely to move.
Significant decision	One that produces a legal effect or a similarly significant effect for the customer. A quote decline or a premium loading qualifies.
Solely automated	No meaningful human involvement in taking the decision. A human who rubber-stamps the machine does not count as involvement.
Meaningful human involvement	A human with real discretion to alter the outcome. If they cannot or do not change it, the decision is still solely automated.
Profiling	Automated processing that evaluates something about a person. Often sits underneath an automated decision.
DPIA	Data Protection Impact Assessment. The formal risk assessment required before high-risk processing. One per high-materiality automated decision.
SMF	Senior Manager Function. The named SMCR role holder accountable for ADM risk in the broker.
DPO	Data Protection Officer. The named individual (or equivalent) accountable for data protection compliance.



Term	What it means here
ICO	Information Commissioner's Office. The UK data protection regulator. The body that takes the complaint when a customer is not satisfied.



## SECTION 1

# The decision inventory

Before you can govern anything, you need to know which customer decisions AI touches. List every customer-facing decision where AI shaped the outcome. Include the ones where AI only nudges it. Map the decision, not the software.

#	Customer-facing decision	Where AI shapes it (tool or model)	Outcome it affects	Personal data? (Y/N)	Special category? (Y/N)	Decision owner
1						
2						
3						
4						
5						
6						

## Decisions to actively check for

- Quote decline or referral
- Premium loading or risk scoring
- Acceptance or eligibility
- Renewal terms and renewal decline
- Mid-term adjustment pricing
- Claims triage and routing
- Fraud flag or suspicious-claim referral
- Recruitment shortlisting (your own staff count too)

A note on special category data. Health, criminal record and similar data sit under stricter rules in Article 22B. If a decision uses it and runs solely automated, you need explicit consent or a narrow legal route. Flag every special category "Y" for a closer look in Section 2.



## SECTION 2

## Solely automated or human in the loop

Two questions decide whether a decision is caught by Articles 22A to 22C. Answer both, per decision, honestly.

Decision	Solely automated? (no meaningful human involvement)	If a human is involved, what do they actually do?	Significant decision? (legal or similar effect)	In scope of 22A to 22C?

### The two tests in plain English

**Meaningful human involvement.** A human in the loop only counts if they have real discretion to change the outcome and sometimes use it. If your colleague clicks accept on whatever the model says, every time, that is a rubber-stamp. The decision is still solely automated, and it is in scope.

**Significant decision.** It is significant if it produces a legal effect or a similarly significant one. A quote decline, a premium loading, a renewal decline, a claims-triage downgrade all clear that bar for the customer affected. A decision that only sorts an internal queue usually does not.

A decision is in scope of the four safeguards when it is both solely automated and significant. Write yes or no in the last column. Every yes carries into Section 3.

### Materiality filter

- High: solely automated, significant, and touches pricing, acceptance, claims, or special category data. Full evidence required.
- Medium: significant but with a genuine human in the loop today. Evidence of that human discretion required, because it is your defence.
- Low: not significant, or no personal data. Light-touch entry on the inventory.



## SECTION 3

## The four safeguards per in-scope decision

For each decision marked yes in Section 2, you owe the customer four things under Article 22C. Show where each one lives.

In-scope decision	(a) Information given to the customer	(b) Route to make representations	(c) Route to human intervention	(d) Route to contest	Evidence reference

### What good looks like in each column

(a) Information. Plain-language wording, in the privacy notice and at the point the decision is made, telling the customer an automated process was used and what it means for them. Reference the exact document and clause.

(b) Representations. A stated way for the customer to put their side before or after the decision lands. A named inbox, a form, a phone route. Not "contact us".

(c) Human intervention. A named human, or a named role, who can look again and has the authority to change the outcome. The rubber-stamp from Section 2 fails this test.

(d) Contest. A clear route to challenge the decision and the timeline you commit to. This is where the statutory complaints clock starts running once a complaint lands. Name the owner and the response timeline you operate to, and keep it inside the statutory window.

A note on the response clock. The four duties above sit in Article 22C. The time limit for responding once a customer formally complains sits in the separate DUAAs complaints-handling regime that starts on 19 June 2026, and the ICO is finalising its detailed guidance through 2026. Operate to a defined, documented response timeline now. Do not wait for the final figure to land before you write the route down.



## SECTION 4

# Accountability

An SMF must own automated decision-making risk. Named individual, not a function.

Named SMF accountable for ADM risk	
Date appointed	
Sign-off recorded where (board minute, governance log, statement of responsibilities)	
Deputy or cover	
Reporting line to the board (frequency)	
Last board paper on ADM risk (date and reference)	

## Roles below the SMF

Role	Named person	What they own
Decision owner (per in-scope decision)		The wording, the routes, the day-to-day calls
IT or technology lead		The tools behind the decisions, vendor due diligence
Data protection lead (DPO or equivalent)		DPIAs, lawful basis, ICO compliance
Complaints owner		The contest route, the response clock, the file
Training owner		Staff awareness, who can intervene, acceptable use

## Documents the SMF should be able to produce

- The completed decision map (Sections 1 to 3)
- A DPIA for each high-materiality automated decision
- Privacy notice wording covering automated decisions, in plain language
- The contest and complaints procedure, with response timeline
- A log of any customer challenge and how it was handled
- Board minute approving the ADM governance framework

Tick what exists. Anything unticked is a gap.



## SECTION 5

## The ICO and complaints file

The output of this worksheet is a single file you can produce the day a customer challenges a decision or the ICO asks. It should contain, in this order:

- One-page summary: number of customer decisions mapped, how many are in scope, named SMF, last review date.
- The decision inventory (Section 1).
- The scope test for in-scope decisions (Section 2).
- The four safeguards table for in-scope decisions (Section 3).
- Accountability page (Section 4).
- Action log (below).
- Date and SMF signature.

Refresh this file before each renewal cycle and whenever a new automated decision goes live.

## SECTION 6

## Action log

Every gap from Sections 1 to 4 lands here.

Gap	Owner	Action required	Target date	Status



## SECTION 7

## Self-score

Score each pillar honestly out of 10. The first time most brokers do this, the score is lower than they expected. That is the point.

Pillar	Score 0 to 10	Evidence	Top priority to fix
Decision inventory completeness			
Scope test applied to every decision			
Four safeguards evidenced per in-scope decision			
Accountability and SMF sign-off			
ICO and complaints file ready			

Total: \_\_\_ / 50

- 40 to 50: you can answer a customer challenge today.
- 25 to 39: you have a story. You need a fortnight to firm it up.
- Below 25: this is the work for the next 90 days. Start with the inventory.



## The next 90 days

A working sequence, not a project plan. The 19 June 2026 complaints regime is the date to aim past, not at.

### Days 1 to 14

- Complete the decision inventory across every team.
- Appoint the SMF and minute it.
- Run the scope test on every decision. Decide which are in scope.

### Days 15 to 45

- DPIA the high-materiality in-scope decisions.
- Write the four safeguards into the privacy notice and the point-of-decision wording.
- Build the contest route and name the complaints owner and the response timeline.

### Days 46 to 75

- Train the team. Make sure every named human intervention point knows they can change the outcome.
- Run a tabletop. One customer, one challenged decision, walk it through the four safeguards against the clock.
- Update the board paper.

### Days 76 to 90

- Pull the ICO and complaints file together.
- Internal sign-off by the SMF.
- Set the quarterly review and the renewal-cycle refresh.

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## About this worksheet

Built to map to UK GDPR Articles 22A to 22D, introduced by the Data (Use and Access) Act 2025. Covers the four safeguards the market is now expected to evidence for every significant automated decision: information, representations, human intervention, and the right to contest. Reviewed quarterly. Refreshed before every renewal cycle.

If you want a working session to fill this in alongside your DPO and your nominated SMF, book a strategy call.

Prepared for UK general insurance brokers. Not legal or regulatory advice. The detailed ICO guidance on automated decision-making is being finalised through 2026, and the complaints-handling regime starts on 19 June 2026. Use this alongside your compliance function and your DPO.