

Sixley AI Governance & Employment AI Position Statement

Version 1.1 (Reviewed Draft)

1. Introduction

Sixley operates a network-driven hiring platform designed to facilitate trusted introductions, referrals, candidate engagement, and recruitment workflows.

Sixley uses artificial intelligence (“AI”) and machine learning technologies in a limited, controlled, and transparent manner to support aspects of this process.

This document explains:

- how Sixley uses AI;
- what Sixley’s AI systems do and do not do;
- how Sixley approaches profiling, transparency, and human oversight;
- how Sixley seeks to align with applicable UK and EU legal frameworks, including:
 - UK GDPR,
 - PECR,
 - ICO guidance,
 - and the emerging EU AI Act framework for employment-related AI systems.

This document should be read alongside:

- Sixley’s Privacy Policy,
 - DPA,
 - DPIA,
 - PECR Position Statement,
 - and Legitimate Interests Assessment documentation.
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2. Sixley’s AI Philosophy

Sixley’s approach to AI is based on the following principles:

- Human-led hiring
- Transparency

- Candidate agency and control
- Explainability
- Proportionality
- Limited and purpose-bound processing
- Human accountability
- Fairness and non-discrimination

Sixley's position is that AI should support:

- communication,
- understanding,
- summarisation,
- workflow efficiency,
- and candidate representation,

without replacing:

- recruiter judgement,
- candidate autonomy,
- or fair hiring processes.

Sixley does not position itself as:

- an autonomous hiring system,
 - an automated recruitment decision-maker,
 - or an AI-led replacement for recruiter judgement.
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3. AI Categories Within Sixley

Sixley separates AI functionality into distinct operational categories.

3.1 Workflow & Communication AI

Purpose:

- Support referral workflows
- Facilitate communication
- Improve operational efficiency

Examples:

- Referral message generation

- Candidate communication assistance
- Conversational guidance tools
- Workflow automation
- Candidate engagement support

Characteristics:

- Non-evaluative
- Non-ranking
- Non-decisioning
- Human-triggered
- Context-specific

These systems:

- do not assess candidate suitability for hiring outcomes;
 - do not autonomously rank candidates for selection;
 - do not make hiring decisions.
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3.2 Candidate-Controlled AI Assistance

Purpose:

- Help candidates better understand and contextualise their application.

Examples:

- AI-generated application summaries
- Experience contextualisation
- Optional application insights
- Candidate-authorized recruiter summaries

Characteristics:

- Candidate-visible
- Candidate-controlled
- Optional
- Transparent
- Editable/rejectable by the candidate
- Shared only with explicit candidate authorisation

The candidate:

- can review outputs before sharing;
- can choose not to use AI assistance;

- can proceed without sharing AI-generated content;
- controls whether any AI-generated summary is shared with a recruiter.

These systems are designed to function as: > candidate-assistance and contextualisation tools,

rather than: > autonomous evaluation or decision-making systems.

AI-generated outputs are intended to:

- summarise application information;
- highlight potentially relevant experience;
- assist candidates in presenting their application context.

AI-generated outputs are not intended to:

- determine hiring outcomes;
 - automatically progress or reject candidates;
 - operate as hidden recruiter-side scoring systems.
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3.3 Outreach Prioritisation & Relevance Processing

Sixley may use limited automated processing to help determine which individuals may be most relevant to contact regarding a role.

Examples may include:

- professional role information;
- reporting structures;
- location;
- organisational relevance.

This processing is used solely to:

- improve relevance;
- reduce unnecessary outreach;
- and support proportional communication.

This processing:

- does not determine recruitment outcomes;
- does not automatically exclude individuals;
- remains subject to human oversight.

Recruiters may review, override, or adjust outreach prioritisation.

3.4 Talent Pool & Future Opportunity Matching (Optional Features)

Sixley may offer optional Talent Pool and future opportunity matching functionality where individuals explicitly opt in.

These systems may:

- identify potentially relevant opportunities;
- organise profiles by relevance;
- use limited profiling to improve matching quality.

Such systems may involve:

- profiling,
- relevance ranking,
- or suitability-related processing.

Where used, Sixley intends to apply enhanced safeguards including:

- explicit opt-in participation;
- transparency regarding processing;
- candidate visibility of outputs;
- human oversight;
- explainability controls;
- objection and withdrawal rights.

Sixley acknowledges that certain future AI matching or profiling features may fall within:

- employment-related profiling,
 - and potentially high-risk AI categories under evolving EU AI regulation.
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4. What Sixley's AI Does NOT Do

Sixley's AI systems are not designed to:

- autonomously hire candidates;
- automatically reject candidates;
- make final recruitment decisions;
- operate without human oversight;
- secretly score individuals;
- invisibly rank candidates for hiring decisions;
- conduct covert behavioural analysis;

- scrape private networks or contact lists;
- analyse private communications;
- create referrals without human initiation.

Recruiters and hiring organisations remain solely responsible for:

- interviewing,
 - assessment,
 - selection,
 - and hiring decisions.
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5. Human Oversight

Sixley maintains human oversight at all material stages of the hiring process.

5.1 Recruiter Oversight

Recruiters:

- review applications;
- make hiring decisions;
- determine progression;
- assess suitability;
- conduct interviews.

AI outputs do not determine hiring outcomes.

5.2 Candidate Oversight & Control

Candidates maintain meaningful control over:

- whether to use optional AI assistance;
- whether to share AI-generated outputs;
- whether to proceed without AI assistance;
- whether to withdraw or edit submissions.

AI-generated summaries are:

- visible to the candidate before sharing;
- optional;

- candidate-authorised.
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5.3 Referral Oversight

Referrals originate from:

- deliberate human actions by named individuals.

Sixley does not autonomously:

- identify people from private networks;
 - create referrals;
 - or contact individuals through automated social outreach systems.
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6. Transparency & Explainability

Sixley seeks to ensure that AI-assisted processing is transparent and understandable.

Where AI-generated outputs are provided:

- users are informed that AI is being used;
- users can review outputs;
- users can decide whether to rely on or share outputs.

Sixley aims to avoid:

- hidden AI evaluations;
- opaque scoring systems;
- undisclosed ranking mechanisms.

AI-generated outputs are intended to function as:

- contextual observations,
- summaries,
- or informational assistance,

rather than:

- definitive assessments,
 - hidden rankings,
 - or autonomous hiring recommendations.
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7. Profiling Position

Sixley recognises that certain AI-assisted processes may constitute profiling under UK GDPR or future EU AI regulatory frameworks.

Sixley's approach is therefore to:

- minimise profiling where possible;
- limit profiling to defined purposes;
- maintain transparency;
- ensure meaningful human involvement;
- provide user control and opt-out rights;
- avoid solely automated decision-making producing legal or similarly significant effects.

Sixley distinguishes between:

- assistive AI processing;
- workflow prioritisation;
- relevance matching;
- and human-led recruitment decision-making.

Where profiling is used:

- it is intended to support relevance and efficiency;
 - not to replace human judgement.
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8. Automated Decision-Making

Sixley does not carry out solely automated decision-making that produces:

- legal effects;
- or similarly significant effects on individuals.

AI-generated outputs:

- do not automatically determine candidate progression;
- do not create automatic rejection outcomes;
- do not autonomously determine hiring decisions.

Human review remains central to all recruitment outcomes.

9. AI Governance & Risk Management

Sixley maintains internal governance controls relating to:

- AI usage;
- data protection;
- transparency;
- retention;
- human oversight;
- and security.

These controls include:

- DPIAs;
- Legitimate Interests Assessments;
- processor due diligence;
- access controls;
- retention schedules;
- human-review requirements;
- prompt and UX governance;
- transparency wording standards.

Sixley monitors:

- evolving ICO guidance;
 - EU AI Act developments;
 - employment AI regulation;
 - and emerging industry best practices.
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10. Product Design Principles

Sixley seeks to avoid:

- manipulative AI behaviour;
- hidden candidate scoring;
- opaque ranking systems;
- discriminatory profiling;
- excessive data collection;
- unnecessary automation.

Sixley product design prioritises:

- candidate visibility;

- explainability;
- proportionality;
- user choice;
- and human accountability.

AI-generated outputs are framed as:

- informational;
- contextual;
- and assistive.

Sixley intentionally avoids framing AI outputs as:

- definitive suitability scores;
 - autonomous hiring recommendations;
 - or hidden candidate evaluations.
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11. Future Regulatory Alignment

Sixley recognises that aspects of employment-related AI are subject to increasing regulatory scrutiny.

Sixley's approach is therefore to:

- architect for transparency and explainability;
- maintain meaningful human oversight;
- minimise hidden profiling;
- separate assistive AI from decision-making functions;
- and maintain candidate control over AI-generated outputs.

Where future functionality may fall within:

- employment-related profiling,
- or high-risk AI classifications,

Sixley intends to:

- implement appropriate governance measures;
 - conduct additional impact assessments;
 - maintain documentation and auditability;
 - and apply enhanced safeguards proportionate to the level of risk.
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12. Final Position

Sixley's AI systems are designed primarily to:

- support communication,
- contextualise applications,
- facilitate introductions,
- improve workflow efficiency,
- and enhance transparency.

Sixley's position is that:

- hiring decisions should remain human-led;
- candidates should retain meaningful agency;
- AI outputs should be visible and controllable;
- and AI should support — not replace — accountable recruitment processes.

Sixley's architecture is intentionally designed to avoid:

- hidden automated decision-making,
- opaque scoring systems,
- and unchallengeable AI-driven hiring outcomes.

The company will continue to evolve its governance approach in line with:

- regulatory developments,
 - technological change,
 - and emerging best practices for trustworthy employment AI.
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Internal Review Summary

This document has been reviewed from three separate perspectives:

1. Privacy & Data Protection Perspective
 - Alignment checked against DPIA, DPA, UK GDPR lawful bases, profiling disclosures, and PECR positioning.
 - Terminology adjusted to avoid contradictions with existing governance documents.
2. AI Regulation & EU AI Act Perspective
 - High-risk employment AI triggers assessed.
 - Distinction strengthened between assistive AI, profiling, and autonomous decision-making.
 - Human oversight and transparency language clarified.

3. Product & Operational Reality Perspective

- Checked against actual Sixley workflow behaviour.
- Removed claims that overstate current safeguards or understate future profiling activity.
- Ensured document reflects actual product architecture and candidate controls.

The result is intended to be:

- legally credible;
- operationally accurate;
- regulator-readable;
- and suitable for enterprise procurement, diligence, and governance discussions.