

Article 10(5) readiness checklist.

Human-reviewed decisions about platform workers under the EU Platform Work Directive (Directive (EU) 2024/2831). Member States must transpose it into national law by **2 December 2026**.

Article references: the Official Journal text of the directive. The meaningful-review items follow the Dutch data protection authority's guidance *Meaningful Human Intervention* (23 July 2025).

1 Know which decisions are in scope

- ☐ We have a list of every automated system that **takes or supports** decisions about people doing platform work. The directive covers both, so a person approving a machine recommendation is still in scope.
- ☐ For each system we know which decisions **restrict, suspend or terminate** an account or contract, or affect pay or contractual status.
- ☐ We have carried out a data protection impact assessment for these systems and shared it with workers' representatives (Art. 8).
- ☐ None of these systems processes the data the directive prohibits, such as emotional or psychological state, private conversations or off-duty data (Art. 7).

2 A human takes the decision

- ☐ Every decision to restrict, suspend or terminate an account or contract is **taken by a human being** before it takes effect (Art. 10(5)).
- ☐ The person deciding is competent, has the information the system used, and has the **authority to change or overrule** the automated outcome (Art. 10(2); AP guidance).
- ☐ Urgent cases (fraud, safety) have a defined route that still ends in a human decision, within a time limit we have set.
- ☐ We have enough trained oversight staff for our decision volume, and they are protected from adverse treatment for overruling the system (Art. 10(2)).

3 Reasons and review

- ☐ The worker receives a **written statement of reasons** no later than the day the decision takes effect (Art. 11).
- ☐ Workers can reach a **designated contact person** with the competence, training and authority to explain a decision (Art. 11).
- ☐ A worker's request for review gets a **written, reasoned reply within two weeks**, and a wrong decision is corrected within two weeks or compensated (Art. 11).
- ☐ Workers and their representatives have been told which systems are in use and what they decide (Art. 9).

4 We can prove it

- ☐ For any single decision we can show **who decided, when, on what information, and what the worker was told**.
- ☐ Those records can be checked by someone outside our team (a court, a regulator, an auditor) without relying on our own system's word for it.
- ☐ We can produce this evidence if a court orders disclosure (Art. 21) or an authority asks (Arts. 9 and 10).
- ☐ We review the impact of these decisions with workers' representatives at least every two years (Art. 10(1)).

Data protection authorities enforce Articles 7 to 11 and can fine up to EUR 20 million or 4% of worldwide turnover (Art. 24). This checklist is a working aid, not legal advice; national transposition laws can add requirements.