



SmartyGrants

Software, data science & grantmaking intelligence

SmartyGrants

AI Transparency Statement

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Accessibility:

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This policy applies to:

SmartyGrants, as operated by Our Community (ABN 24 094 608 705) in Australia, and Our Community International (CRN 15906965) in the United Kingdom.

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1 Uses of AI at SmartyGrants

Like many technology companies, SmartyGrants uses AI in two distinct ways.

1. AI used in how we work internally

Our staff use AI-assisted tools to support a range of internal operational tasks, including, for example:

- document generation and editing;
- business analysis;
- code development and review;
- content generation, classification and summarisation;
- dashboard generation; and
- administration.

Staff and contractors are bound by our data use policies and information classification framework, which define what data can be accessed by whom, which tools data may be accessed and processed by, and under what conditions data may be accessed and processed.

Staff and contractors are also required to know and understand our AI policies and safety guidelines, and must have new tools assessed internally before use, in line with these policies.

Tools are evaluated carefully, according to a documented process, and appropriate guardrails may be put in place to protect privacy.

We do not permit AI tools to use our data to train their models.

While AI may be used for various tasks in the course of our work, humans retain full accountability for any content or products developed, and for decision-making.

Data submitted through SmartyGrants (e.g. in applications, assessments and outcomes reports) belongs to our clients (i.e. grantmakers) and their applicants. It stays within SmartyGrants-controlled systems and is never passed to the AI tools our staff use internally in their day-to-day work.

If a grantmaker asks us or agrees to us using their data for a specific purpose (e.g. to assist with a support request or a data analysis project), we will obtain express consent before doing so.

In the ordinary course of our work, we may use our customers' business contact details, such as their names and email addresses, in AI tools when drafting correspondence or managing the relationship. This use is limited to information shared with us as part of the business relationship, not information submitted through grant programs. This use is incidental to the primary purpose of managing our relationship with you and will at all times be done in accordance with the Our Community Privacy Policy or the SmartyGrants UK Privacy Policy (as applicable).

If you have any questions or concerns about how our staff use AI in our operations, you can contact us via the methods listed in section 7 of this Statement.

2. AI and Automation features built into the SmartyGrants platform

As well as using AI in our own work, we build AI tools and automations into SmartyGrants. Grantmakers can choose to enable these features within their own accounts. If they do so, Submitted Data may be processed by those features; that is their primary purpose. Grantmakers decide when and how to use AI features in their grant programs and are responsible for how outputs from AI tools and automations are used in their decision making. SmartyGrants provides the infrastructure, the safeguards, and the documentation to support the use of AI tools and automations. Grantmakers decide whether, when and how to use such tools.

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The remainder of this Statement is focused on this second use case: how we build and manage the AI and Automation features that we make available to our customers through SmartyGrants.

2 What AI and Automation mean for SmartyGrants

SmartyGrants uses a combination of Artificial Intelligence (AI) and Automation to help grantmakers manage and improve their grant programs. AI and Automation are different things, and we think it is important to be clear about what we mean when we use these terms.

Automation refers to features that follow defined rules and logic. These are predictable, controllable systems; for example:

- automatically moving an application through a workflow stage when a condition is met; or
- checking whether a field has been filled in correctly; or
- text classification based on a set of rules.

There is no guesswork or AI involved. The system does exactly what it has been configured to do.

Artificial Intelligence or **AI** refers to features that use models to analyse text or data and generate outputs, such as summaries or suggestions, that would be difficult to produce reliably through fixed rules alone. AI features at SmartyGrants are designed to assist human decision-making, not replace it.

Some features can combine both AI and Automation. For example, AI might generate a summary, while automation controls where that output appears and how it can be reviewed and acted upon. In such cases, insights generated by AI are only useful because they are embedded in a controlled, governed workflow.

Throughout this Statement, we may refer to AI and Automation features collectively as '**AI features**'. Where a distinction matters, we will be explicit.

SmartyGrants tools are designed to ensure people remain in control of decision making, whether using AI or Automation.

Important: As at June 2026, SmartyGrants does not have any large language model (LLM)-powered features in production. All current AI and Automation features in the

platform are rule-based automations. Our first LLM-powered feature is expected to be released by early 2027, subject to testing, governance and ethical review. More information on what's available now is in section 6.

3 Our principles for AI development

These principles guide everything we build and describe how we work.

Human decision-making remains central. AI and Automation are used to assist, not replace, human judgement. Final decisions should be controlled and owned by people. Our tools generate summaries, suggestions and flags, not verdicts.

Automation before AI. We prioritise well-designed automation first. Many problems are best solved with clear rules, structured data and good workflows. AI is introduced only where it materially improves usefulness or insight.

Tools are fit for purpose. We design intelligence to sit inside real grantmaking processes. Tools must work with existing forms, data and decision points, reducing duplication and friction rather than creating new steps or parallel systems.

A focus on utility, efficiency, quality and fairness. AI and Automation should make grantmaking simpler and faster for everyone involved: grantmakers, assessors and applicants. Any feature we deploy must demonstrably reduce time and effort without introducing shortcuts that compromise the quality or fairness of decisions.

User knowledge and understanding are central. We prepare users before introducing AI features into production. Training and documentation focus on what the AI feature can be used for, and, just as importantly, what it should not be used for. This ensures AI is adopted confidently, safely and in line with its intended purpose.

Control, choice and reversibility. Clients (that is, grantmakers) retain control. AI-enabled features can be turned on or off to suit organisational policies and preferences, and withdrawn without breaking core workflows. There are no forced dependencies.

Transparency and explainability. We favour systems that can be explained in plain language. Where AI is used, we are clear about its purpose, what data it uses, its known limitations, and the safeguards in place. For AI features that use probabilistic or machine learning methods, we explain what the system is designed to do and how outputs should be interpreted, even where the precise internal reasoning cannot be fully traced. Features where we cannot provide a meaningful explanation of purpose and safeguards are not deployed.

Supporting data stewardship and containment. SmartyGrants operates separate Australian and UK infrastructure. Your data is stored in the region the grantmaker is hosted in and doesn't leave it. We do not send data outside those jurisdictions, and we do not allow third parties to train models on data submitted through SmartyGrants. See section 4 of this Statement for further information.

Incremental, evidence-led delivery. We consult widely, build iteratively, test with real users, and refine based on evidence. We prefer steady improvement over bold claims.

A commitment to transparency. We review this Statement at least annually and update it whenever our approach changes, and we notify customers via *SmartyNews* when we make amendments.

Ethical review and risk assessment. Every AI feature goes through two layers of review. First, we conduct a structured ethical review using our Dignity Lens framework, which examines the potential impact on the people most affected, including grant applicants and the communities they represent. Features that do not pass this review are not progressed. Second, we conduct a Data Protection Impact Assessment (**DPIA**) that analyses privacy and data protection risks for each AI-enabled feature, taking into account harm, bias and discrimination. The DPIA covers each feature during development and continues after release: features are reassessed periodically in production and whenever they change in a material way. Where a DPIA identifies a high residual risk that cannot be adequately mitigated, the feature is not deployed. Read more: [The ethics of automated classification – a case study using a Dignity Lens](#).

4 Your data

What data do AI and Automation features use?

SmartyGrants AI features only access the SmartyGrants Submitted Data required to perform their specific function. They do not access data from other grant programs or clients, and they do not combine data across grant programs without explicit configuration by the grantmaker. All data processed by AI features is transmitted securely using TLS (encryption in transit), and features apply data minimisation principles i.e., they only access what is needed for the specific task.

The data used varies by AI feature and is documented in the AI Supplier Governance Pack that is released with each new feature. As a general principle:

- Rule-based automations use structured data – e.g. form fields, dates, identifiers – to perform defined checks or trigger actions; and
- AI features use text from within the grant program – for example, application form responses or outcomes data – to generate summaries, classifications or suggestions.

Where is data stored?

- Australian and New Zealand clients: data is hosted in Australia (Amazon Web Services, Sydney region).
- UK and European clients: data is hosted in the United Kingdom (Amazon Web Services, London region).
- Other clients: clients in regions other than those listed above must choose one of the two named jurisdictions (Sydney or London) for hosting their data.

Data does not leave its primary hosting jurisdiction without the relevant client's explicit consent and without assessment and documentation of the receiving jurisdiction's privacy protections.

What we do not do:

We do not use PII Data contained within Submitted Data in our internal AI tools for software development. PII data from grant programs stays within SmartyGrants-controlled systems and is never passed to the tools our staff use day-to-day without explicit consent from clients.

We do not share any Submitted Data with third-party AI providers for their own purposes.

We do not facilitate automated decisions without human involvement.

For full detail on how personal information is handled, refer to the Our Community Privacy Policy (for AU and NZ customers) and the SmartyGrants UK Privacy Policy (for UK, Ireland and other non-AU/NZ customers), both available at:

<https://www.smartygrants.com/policies#privacy-policy>.

5 Your rights and choices

All AI and Automation features are optional for grantmakers.

Grantmakers (that is, the government agencies, councils and philanthropic, not-for-profit, corporate and other bodies that use SmartyGrants) choose whether to enable AI and Automation features for their grant programs. No AI feature is switched on by default. If an AI feature is not enabled, it plays no role in any grant application or assessment process.

Where AI features are enabled by a grantmaker, grant application data is processed by those AI features within SmartyGrants-controlled systems. The grantmaker decides which AI features are enabled and is responsible for how they use the outputs in their decision-making. SmartyGrants is responsible for how it builds, operates and governs those AI features, and for how it handles personal information within them. For information about your privacy rights in relation to AI processing by SmartyGrants, see the Our Community Privacy Policy or SmartyGrants UK Privacy Policy (as applicable). Grantmakers can turn AI features off at any time.

Enabling or disabling an AI and Automation feature does not affect the underlying grant program or any applications already in progress. Core workflows always remain available.

Decisions about grant applications are made by people.

Where AI and Automation features are used in a grant program, our tools are designed to generate suggestions, summaries or flags for human review. We frame our AI tool development to ensure important decisions, including whether an application is funded or not, always involve human judgement by the grantmaker.

You can ask questions and raise concerns.

Each AI feature is released with an AI Supplier Governance Pack that describes what the AI feature is designed to do, what it should not be used for, and what data it accesses.

If you are a grantmaker and have questions about any AI and Automation feature, you can contact our support team or your account manager.

If you are a grant applicant and have questions or concerns about how AI and Automation may have been used in the assessment of your application or a progress report/acquittal, you should contact the grantmaker (the organisation running the grant program) in the first instance. Grantmakers are responsible for how they use AI and Automation features within their grant programs and for responding to review requests.

If you are unable to resolve your concern with the grantmaker, you can contact SmartyGrants via the channels listed in section 7 of this Statement.

Our commitments and applicable law.

The commitments in this Statement reflect applicable privacy and responsible information handling and information sharing obligations across the jurisdictions in which we operate, including requirements relating to automated decision-making under relevant legislation in Australia, New Zealand, the United Kingdom and Europe.

6 What is available

Automation features

SmartyGrants currently (as at June 2026) offers the following Automation features. All features are optional.

Auto-classification (CLASSIEfier / CLASSIE)

(currently available only to Australian and New Zealand customers)

[CLASSIEfier](#) is a rule-based text classification tool that automatically applies the [CLASSIE](#) social sector taxonomy to Australian and New Zealand grant applications. It uses a transparent keyword-matching approach, not machine learning, so its outputs can be understood and audited at any time. It is used for analysis, benchmarking and reporting. Grantmakers and (where permitted) applicants can review, amend or override classifications. Known limitations are publicly documented at smartygrants.com.au/research.

Workflow: Stages, Tasks and Rules

(available to all SmartyGrants customers)

SmartyGrants includes a rules-based automation feature that helps grantmakers configure and manage their internal grantmaking processes: moving applications between stages, assigning tasks, and triggering actions based on defined conditions. There is no AI involved. Responsibility for process design and decision-making remains with the grantmaker.

Round Approval Workflow

(currently available to pilot clients only)

SmartyGrants includes a rules-based workflow that enables structured review and approval of grant rounds before they are published. All approvals are performed by authorised human reviewers within the grantmaker's organisation.

AI features

SmartyGrants currently (as at June 2026) does not have any LLM-powered features in production. Our first LLM-powered feature is expected to be released by early 2027, subject to testing, governance and ethical review.

7 Where to find more information

Resource	What it covers
SmartyGrants Help Hub – AU SmartyGrants Help Hub – UK	How-to guides and feature documentation for grantmakers
AI Supplier Governance Pack	Per-feature documentation that is released with each AI-based feature. Rule-based automation features do not require a Governance Pack.
Our Community Privacy Policy	Explains how personal information is collected, used and protected – <u>for Australian and New Zealand customers.</u>
SmartyGrants UK Privacy Policy	Explains how personal information is collected, used and protected – <u>for UK and other non-Australian/New Zealand customers.</u>
Research: The ethics of automated classification	A peer-reviewed case study on CLASSIEfier
Contact details: https://www.smartygrants.com/about/contact-us	Where and how you can raise questions or concerns about our AI and Automation features

8 Glossary

AI (Artificial Intelligence): Software that analyses text or data to generate outputs like summaries or suggestions. **Automation:** Features that follow fixed rules and logic. Predictable, auditable, no guesswork.

AI and Automation features or AI features: The optional tools grantmakers can enable within their SmartyGrants grant programs.

Grantmaker: The organisation running a grant program on SmartyGrants, typically a government agency, council or foundation.

Grant applicant: Any individual or organisation that submits an application through a SmartyGrants-powered program:-

Submitted Data: Information entered into SmartyGrants by grantmakers, applicants, assessors and other program participants. This includes grant applications, assessment responses, outcomes reports and program records. It belongs to the grantmaker, stays within SmartyGrants-controlled systems, and is never used in internal AI tools without explicit written permission.

Personal Identifiable Information (PII): Any information about an identifiable individual. See the Our Community Privacy Policy and the SmartyGrants UK Privacy Policy (<https://www.smartygrants.com/policies>) for a full definition.

LLM (Large Language Model): The technology behind tools like ChatGPT. It generates text by learning patterns from large amounts of data.

Rule-based system: A system that runs on explicit human-defined logic. Its decisions can be inspected and audited at any time.

AI Supplier Governance Pack: A document released with each AI feature describing what it does, what data it uses, and what safeguards apply.

Dignity Lens: SmartyGrants' ethical review framework, which is applied before any AI feature is deployed.

CLASSIE taxonomy: A classification system for the Australian and New Zealand social sector, used by CLASSIEfier to categorise grant applications.