

AI IN HR: WHAT THE EU AI ACT MEANS FOR YOU

A practical guide for HR professionals

KEY POINTS YOU SHOULD KNOW

- HR-related AI tools, such as those used in recruitment or promotion, are considered high-risk under the EU AI Act.
- You are accountable for making sure that any AI system used in HR processes respects privacy, fairness, and transparency.
- Human oversight must be handled by someone AI literate i.e. trained and capable of reviewing or overriding the system's outputs.
- You are responsible for ensuring that input data is accurate, up-to-date, and aligned with the intended use of the AI system.
- Automated decisions must not be made without meaningful human involvement, especially when those decisions affect people's careers.
- If the AI system behaves unexpectedly or raises concerns, you must be ready to pause its use and assess the risk.
- Keep system logs accessible and secure, you may need to reference them in case of an investigation or incident.
- Everyone affected by your use of AI (employees, candidates, stakeholders) must be informed about what the system does and how it's used.

YOUR CHECKLIST TOWARD AI READINESS & COMPLIANCE

- ☐ Identify where AI is already in use across your HR tools or platforms.
- ☐ Review the intended purpose of each AI use case. Why are you using it? What decision does it influence?
- ☐ Check if the AI system impacts hiring, promotion, or evaluation. If yes, it's likely high-risk.
- ☐ Appoint someone to coordinate your HR AI compliance efforts (e.g. HR, Legal, or DPO).
- ☐ Ensure everyone working with the system has basic training in AI awareness and ethical use.
- ☐ Document how the AI supports decisions and how human oversight is maintained.
- ☐ Ask your vendor to provide documentation and support for compliance with the EU AI Act.
- ☐ Prepare simple communication for candidates and staff explaining how AI is used and their rights.
- ☐ Start logging your review and compliance activities as a routine practice.



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QUESTIONS TO ASK WHEN SELECTING AN AI TOOL IN HR

- What decisions will the AI system influence (e.g. who to hire, promote, retain)?
- Is the system explainable? Can we understand how it reaches its conclusions?
- Who trained the AI? On what data? Was it diverse and bias-checked?
- Can we challenge the tool's output? Is the tool audited?
- How is sensitive data (e.g. personality, gender, behavior) being used and protected?
- Do we have the right to give feedback or override the tool's recommendations?

WHAT TO ASK YOUR AI VENDOR BASED ON EU AI ACT

- Can you confirm your AI system complies with the core requirements of the EU AI Act?
- Do you have a documented risk management system?
- How do you ensure proper data governance and quality?
- Is technical documentation available and up to date?
- Are logs of system activities stored and accessible?
- How do you ensure transparency for end users?
- What mechanisms ensure human oversight is built into the system?
- Is the AI system tested and compliant with robustness and cybersecurity standards?
- Do you have a quality management system in place?
- What is your procedure for responding to anomalies or required corrective actions?

