

AI Act preparation checklist for recruitment

Twelve checks for employers that use AI to screen applications, run interviews or evaluate candidates. Take it to your counsel and your works council. The main high risk duties apply from 2 December 2027; some rules already apply, and the GDPR applies today.

YOUR TOOLS

- ☐ List every tool in your hiring process that uses AI, and what it does with candidate data.
- ☐ Ask each provider whether it infers emotions or assesses accent, appearance or background.
- ☐ Check data processing agreements and subprocessors with every provider.

CANDIDATES

- ☐ Review candidate information: do candidates know when they deal with AI, what is recorded and who decides, in language they understand?
- ☐ Confirm that no candidate is rejected or moved forward without a person reviewing their case.

OVERSIGHT AND RECORDS

- ☐ Name the people responsible for oversight, make sure they understand the tools, and give them time to do it at your real volume.
- ☐ Write down the criteria used for each role, and keep a record of who decided and on what evidence.
- ☐ Set and document retention periods for applications, recordings and verification results.
- ☐ Start a data protection impact assessment before go live, and confirm its scope with counsel.
- ☐ Plan how you will monitor outcomes, including lawful checks for differences between groups.

PEOPLE AND PARTNERS

- ☐ Ask counsel whether your works council has a right of consent.
- ☐ If you are a staffing agency, agree roles for AI assisted screening with each client, and check whether offering a tool under your own name makes you a provider.