

EU AI Act & Hiring

Compliance Training

Module 1: What is the EU AI Act?

Module 2: The 4 Compliance Requirements

Module 3: Your AI Audit

Module 4: Building Compliant Processes

Module 5: Ongoing Compliance

How This Training Works



Understand the Law

What the EU AI Act requires from organisations that use AI in hiring — in plain English, not legal jargon.



Audit Your Tools

Identify every AI hiring tool you use and assess whether it currently meets compliance requirements.



Take Action


Leave with a prioritised action plan, a practical audit checklist, and clear ownership of next steps.

Duration: Half day (3.5 hrs) or two 90-min sessions | Audience: HR Managers & Leadership | Level: Beginner–Intermediate

MODULE 1

What Is the EU AI Act?

Understanding the world's first comprehensive AI regulation — and why it matters for how you hire people.

 30 minutes

The Big Picture

UNACCEPTABLE RISK

Banned outright — cannot be used

Social scoring, mass surveillance

HIGH RISK

Strict compliance required — this is where you operate

ALL hiring & recruitment AI

LIMITED RISK

Transparency disclosure to users only

Chatbots, deepfakes

MINIMAL RISK

No requirements — free to use

Spam filters, scheduling tools

Does This Apply to You?

The Act follows the candidate, not the company. Headquarters location is irrelevant.

✓ YES — You must comply if you...

- Hire any EU-based candidates
- Use AI to screen or rank CVs
- Use chatbots in candidate engagement
- Use predictive analytics in hiring
- Have automated shortlisting or filtering


✗ NOT exempt if you...

- ✗ Are headquartered outside the EU
- ✗ Are a small or medium business
- ✗ Only use AI occasionally
- ✗ Have a vendor who says they're compliant
- ✗ Are based in the UK post-Brexit

MODULE 2

The 4 Compliance Requirements

What your organisation is legally required to have in place for every AI hiring tool.

 45 minutes

The 4 Core Requirements

01

Human Oversight

AI can recommend — but a qualified human must review, challenge, and approve every AI recommendation. No automated rejection without human review.

02

Transparency

Candidates must be told when AI is evaluating them. They have the right to request a human review of any AI-assisted decision.

03

Data Quality

Training data must be bias-tested and demographically representative. If the data is biased, the AI output is biased — and you are liable.

04

Documentation

Maintain full records of how each AI system works, how it was tested, and how human oversight is implemented. Regulators can request these at any time.

Requirement 1: Human Oversight

The most operationally significant requirement — and the one most organisations get wrong.

✗ NOT Compliant

- ✗ AI ranks candidates 1-100
- ✗ Recruiter only interviews top 10
- ✗ Bottom 90 auto-rejected
- ✗ Recruiter never reviewed AI reasoning
- ✗ No record of what the AI decided or why

✓ Compliant

- ✓ AI produces ranked recommendations
- ✓ Recruiter reviews the full list — not just the top
- ✓ Recruiter checks for unusual exclusions
- ✓ Recruiter documents what they reviewed
- ✓ Shortlist approved by recruiter before action

Requirements 2 & 3: Transparency & Data Quality



TRANSPARENCY — What candidates must know

Update job application pages

Add AI disclosure statement to every application form

Update privacy notice

Explain what AI processes, using what data, and why

Create appeals process

Candidates can request a human review — you must have a named contact

Train recruiters

They must be able to explain to candidates what tools were used

DATA QUALITY — Questions to ask your vendors

- What data trained this model — and how diverse is it?
- Has it been bias-tested across gender, age, ethnicity and disability?
- Can you provide bias testing documentation?
- What happens when bias is detected in live use?
- Are you fully compliant with the EU AI Act as a provider?

MODULE 3

Your AI Tool Audit

How to identify every AI hiring tool you use, classify its risk level, and assess your compliance readiness.



45 minutes · Use the Audit Checklist

The 4-Step Audit Process

1

Build Your Inventory

List every tool or system where software makes any judgement about a candidate. Include your ATS, assessment tools, video platforms, chatbots, and sourcing tools. Include features you may not have activated.

2

Classify Each Tool

For each tool, ask: does it filter, rank, score or recommend candidates without a human reviewing each individual case? If yes — it's HIGH RISK and requires full compliance.

3

Assess Readiness

For each high-risk tool, work through the four compliance requirements. Score each: fully in place, partially in place, or not in place. Use the Audit Checklist PDF for the detailed question framework.

4


Prioritise Your Gaps

Rank gaps by urgency: Critical (fix within 30 days), High (90 days), Medium (6 months), or Ongoing. Assign an owner to each action. Set a review date.

MODULE 4

Building Compliant Processes

The specific process changes your team needs to make — with practical templates and talking points.

 40 minutes

4 Process Changes You Need to Make

1

Redesign Screening Workflow

Add mandatory human review steps at every AI output point. Document what recruiters checked and any overrides made.

Owner:
Recruiting Team

Within 30 days

2

Update Candidate Communications

Add AI disclosures to application pages, privacy notices, and rejection emails. Create appeals process with a named contact.

Owner: HR + Legal

Within 30 days

3

Train Your HR Team

Every recruiter using an AI tool must understand what it does, how to review its output critically, and how to document their review.

Owner: HR Managers

Within 90 days

4

Assign Compliance Ownership

Name a compliance owner responsible for the AI tool inventory, documentation, quarterly audits, and regulatory updates.

Owner: Leadership

This week

Practical Template: AI Disclosure Statement



Copy, adapt, and add this to your application pages and privacy notices.

SAMPLE AI DISCLOSURE — Application Form / Privacy Notice

"We use automated tools to assist in reviewing job applications. These tools help us manage high volumes of applications fairly and efficiently. All AI-assisted recommendations are reviewed by a qualified member of our recruitment team before any decision is made about your application.

If you would like to request a human review of any decision relating to your application, or if you have questions about how we use automated tools, please contact [Recruiter Name] at [email address]. You will receive a response within 5 working days."

KEY ELEMENTS TO INCLUDE IN YOUR VERSION:

That AI tools are used:

Vague language is not sufficient — you must be explicit

A named contact for appeals:

Generic inboxes are insufficient — a person must be named

That a human reviews AI outputs:

This demonstrates your human oversight requirement

A response timeframe:

Best practice is within 5 working days

MODULE 5

Ongoing Compliance

Compliance is not a one-time project. Build the habits and schedules to stay compliant as your tools and regulations evolve.

 30 minutes

Your Compliance Calendar



EVERY NEW TOOL

Classify the tool, assess readiness, add to inventory — BEFORE going live. Never deploy a new AI hiring tool without completing this step.

EVERY HIRE CYCLE

Confirm human review documentation is being completed. Spot-check recruiter review records to ensure they are meaningful, not rubber-stamped.

QUARTERLY

Bias review — check AI outputs for demographic patterns, request updated vendor bias reports. Escalate any concerns to legal immediately.

BI-ANNUALLY

Full tool inventory audit — tools retired? New features added? Any scope changes? Reassess any changed tools from scratch.

ANNUALLY

Full compliance review — update all documentation, retrain HR team on any updates, check for regulatory changes and new guidance from the EU AI Office.

AFTER ANY INCIDENT

Document immediately, assess candidate impact, notify compliance owner. Consider whether regulatory notification is required. Review and update processes.

Your Key Takeaways

Everything you need to remember from today in one place.

1 The EU AI Act applies to you if you hire EU residents and use AI in that process — regardless of where your company is based.

2 All AI hiring tools are HIGH RISK — the strictest compliance tier. This means full obligations: oversight, transparency, data quality, documentation.

3 AI can help you hire — but a qualified human must review, challenge, and approve every recommendation. No automated decisions.

4 Candidates have rights: to know AI was used, to request a human review, and to an explanation. You must be able to provide all of these.

5 Start your audit this week. Use the checklist. Assign a compliance owner. The deadline is August 2026 — and it is closer than it looks.

Your Next Steps

This week

Complete Step 1 of your audit — build your AI tool inventory using the checklist

This month

Send vendor compliance questionnaires and review your candidate communications

Month 3

Implement human oversight protocols and train your recruiting team

Month 6

Finalise all documentation and assign your compliance owner formally

Aug 2, 2026

Full compliance achieved — regular audit schedule running

Take your Audit Checklist. Start today.

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