



HR Checklist

Meeting Your Responsibilities as a Deployer of AI

A practical guide to what's required of you under the EU AI Act

Using AI in HR brings new obligations. Under the [EU AI Act](#), organizations that deploy AI in 'high-risk' areas including hiring and talent management need to understand where AI is being used, manage potential risk and maintain appropriate human oversight.

Some of these responsibilities are already in force, while others, including a Fundamental Rights Impact Assessment for high-risk hiring and talent tools, apply from December 2027. Knowing the timeline now will help you prepare in good time.

What it means to be a 'deployer'

If your organization deploys an AI system in your people processes or candidate workflows – regardless of whether it was built internally or supplied by a third-party – you would be considered a deployer under the EU AI Act. Follow the guidance to meet your obligations.

This practical checklist breaks down these obligations into actions HR teams can take now – helping you strengthen governance, ask the right questions internally and build greater confidence in how AI is used across your organization.

You don't need to be an expert to navigate these new responsibilities. Instead, work closely with colleagues across legal, IT, and compliance, and share our [12 Questions to Ask Your AI HR Vendors](#) to support procurement with AI due diligence.

Inventory and classification of AI use

- ☐ List every tool used across the employee lifecycle that involves AI or algorithmic scoring
- ☐ For each tool, record whether you built it in-house, adapted it for your organization, or use it exactly as provided by the vendor
- ☐ Determine whether each tool is likely to be classified as high-risk under the EU AI Act
- ☐ Flag any tools where the high-risk classification is unclear and refer them for legal review
- ☐ For any tools classified as high-risk, prepare for the Fundamental Rights Impact Assessment (FRIA) required from December 2027, and start early given the preparation involved

Fairness testing and documentation for each high-risk tool

- ☐ Confirm whether the tool has been tested for bias or adverse impact, and when that testing was last carried out
- ☐ Identify who is responsible for this testing – your internal team or your vendor – and confirm they have the expertise to do it properly
- ☐ Establish an ongoing monitoring cadence for accuracy and fairness
- ☐ Document the methodology behind the tool in plain language your legal and HR teams can explain to a candidate, employee, or regulator if asked

AI literacy

- ☐ Confirm which staff work with or oversee AI systems as part of your HR processes
- ☐ Assess whether those staff have sufficient understanding of how the AI systems work, including their capabilities, limitations, and risks
- ☐ Provide training where gaps exist, ensuring literacy keeps pace as tools are updated or new ones are introduced
- ☐ Document literacy measures taken, since this obligation has been in force since February 2025 and evidence may be requested

Decision process and human oversight for each high-risk tool

- ☐ Map out exactly where a human reviews or can override the AI's output
- ☐ Confirm that human reviewers have enough time, information, and authority to meaningfully challenge an AI-driven outcome – not just a checkbox to click
- ☐ Track how often human reviewers override AI-driven recommendations
- ☐ Document the oversight process so decisions can be explained and justified if questioned

Transparency and communication

- ☐ Confirm candidates and employees are told when they're interacting with an AI system
- ☐ Prepare a clear, plain-language explanation of how an AI-assisted decision is made, in case a candidate or employee asks
- ☐ Review AI disclosures in privacy notices, offers, rejection letters, and employee handbooks

Vendor management and contracts

- ☐ List every vendor providing an AI tool to HR
- ☐ Ask each vendor to provide documentation and evidence demonstrating their ability to meet compliance requirements, including bias testing, conformity assessments, and logging capabilities
- ☐ Establish clear contractual provisions outlining responsibility and liability should a vendor's tool fail to meet compliance requirements after deployment
- ☐ Build compliance documentation requirements into your next Request For Proposal (RFP) or renewal process from the outset

Ongoing readiness

- ☐ Revisit this checklist at least twice a year; tools, vendors, and regulatory guidance are all likely to change
- ☐ Assign responsibility for monitoring regulatory developments, including deadline changes, new guidance, and national implementation requirements
- ☐ Build compliance readiness into the evaluation of new HR technology before purchase, not after implementation

Two ways to keep moving

This checklist is a strong step toward demonstrating compliance as a deployer under the EU AI Act.

For the complete picture, pair it with our questions for evaluating AI vendors.

[Read the Vendor Questions](#) >>

We have spent nearly five decades building assessment solutions on the same principles the Act now requires: **fairness, transparency, and human oversight.**

[Talk to Our Team](#) >>



PLEASE NOTE: Requirements and timelines vary by country and are still evolving. This checklist is a planning tool, not legal advice – please work with stakeholders in your company to confirm specifics relating to compliance matters.