

## COMPLIANCE CHECKLIST



# EU AI Act checklist for CV-screening tools.

CV-sorting and candidate-evaluation software is the European Commission's own worked example of a high-risk AI system (Annex III, point 4). The Digital Omnibus — approved by the European Parliament on 16 June 2026 and by the Council on 29 June 2026 — moved the full high-risk obligations for these systems from 2 August 2026 to 2 December 2027. That is a deferral, not an exemption: transparency duties, the prohibited-practices list and GDPR Article 22 apply independently of that date. Use this page to see where you stand.

## CL. 01 — APPLIES NOW

## Do not wait for 2027

### ■ No prohibited practices in the pipeline

No emotion recognition in interviews or the workplace, and no biometric categorisation that infers protected traits (race, political views, sexual orientation). These are banned outright — already in force.

### ■ Candidates are told where automation is used

Your privacy notice and first outreach say, in plain language, which steps of screening are automated or AI-assisted. Most agencies will be forced to do this in 2027; doing it now is free trust-building.

### ■ A human meaningfully reviews automated rejections

GDPR Art. 22 applies in parallel and is not deferred: a rejection made solely by automated means needs real human involvement — someone who can and does change the outcome, not a rubber stamp.

## CL. 02 — GET AHEAD OF 2 DECEMBER 2027

## Cheap to build now, painful to retrofit

### ■ Every score is explainable

You can show a candidate or a client which criteria produced a score — not “the model decided”. (Transparency · Art. 13)

### ■ Decisions are reproducible

Re-running the same CV against the same role months later gives the same result. This is the basis of any credible audit — and impossible to bolt on afterwards.

### ■ Screening activity is logged

The system keeps logs of what it did, per candidate and per role; the Act expects at least six months’ retention. (Record-keeping · Art. 12)

### ■ A named human oversees the system

Someone in your agency is designated to oversee the tool, understands its limits, and can intervene. (Human oversight · Art. 14)

### ■ Candidate data is governed and EU-scoped

You know where candidate data is processed, which third parties see it, and how deletion requests are honoured. (Data governance · Art. 10, alongside GDPR)

## CL. 03 — ASK ANY SCREENING VENDOR

## Four questions that separate marketing from architecture

- “Can you show me, in writing, how a specific score was produced?”
- “Will the same CV and the same role produce the same result on a re-run?”
- “Where is candidate data processed — and is any of it sent to third-party AI models?”
- “Can I export a per-candidate audit trail I could hand to a regulator?”

Practical orientation for recruitment agencies — not legal advice. Verify obligations against the Regulation and your own counsel.