



CHECKLIST

AI in Hiring Assurance Checklist

What to check before you switch a tool on, and every quarter after.

WHERE BETTER BEGINS

September 2026 | Version 1.0

For UK employers, with notes for those hiring into the EU. Not legal advice.

READ THIS FIRST

How to use this checklist

Most organisations using AI in hiring cannot say, in one place, what it does, who checked it and what happens when it gets something wrong. This checklist is a way to find out. It takes about ninety minutes with the right people in the room: whoever runs recruitment, whoever owns data protection, and someone who understands your applicant tracking system well enough to say what is actually switched on.

Scoring

- **Yes** means you can show the evidence listed under the question, today, to someone who asks.
- **Part** means it is true in some places, or true but not written down. Treat it as a No until you can evidence it.
- **No** means it is not in place. Note the owner who will fix it.
- **N/A** means the question genuinely does not apply. Write down why, so the next reviewer does not have to guess.

Order of attack

Work through sections 1 and 2 first, because you cannot assess what you cannot see. Then go straight to sections 3 and 4. Those cover the lawful, fair and human-oversight questions the ICO has said it is focused on in recruitment, so any No there is your priority. Sections 5 to 8 make the arrangement robust.

Do not turn this into a score

A high number of Yes answers does not mean you are safe, and a low number does not mean you are failing. Each No is a specific gap with a specific fix. Fix the ones that could hurt a candidate first.

Where the questions come from

The UK Data (Use and Access) Act 2025 rules on automated decision-making; the ICO's March 2026 report Recruitment rewired and its draft automated decision-making guidance; the EU AI Act as amended by the Digital Omnibus on AI (high-risk obligations for recruitment systems now apply from 2 December 2027); Gartner research on candidate trust and fraud; and MβB's experience of running hiring at scale. This is a practical tool, not legal advice. Take advice on your own position, and check the current status of the ICO's final guidance.

1. Know what you are using

You cannot govern what you have not found. The ICO reported that several employers who thought they were not using automated decision-making in recruitment were in fact doing so.

Ref	Question	Yes	Part	No	N/A	Owner and notes
1.1	We hold one list of every tool in our hiring process that uses AI, machine learning or automated scoring, including features inside our ATS, job boards, assessment platforms and video interview tools. <i>Evidence: The register, with a last-reviewed date.</i>	☐	☐	☐	☐	
1.2	For each tool we know which stage it works at, what candidate data it uses and what it produces: a draft, a recommendation, a score, a ranking or a rejection. <i>Evidence: One entry per tool in the register.</i>	☐	☐	☐	☐	
1.3	We have asked each vendor in writing which AI features are switched on in our account, and whether any were enabled by default. <i>Evidence: Written vendor confirmations.</i>	☐	☐	☐	☐	
1.4	A named person owns the register and reviews it at least quarterly. <i>Evidence: Owner name and review log.</i>	☐	☐	☐	☐	
1.5	We have a rule on public AI tools (such as general-purpose chatbots), and recruiters and hiring managers know not to paste candidate data into unapproved ones. <i>Evidence: Written policy and evidence it was communicated.</i>	☐	☐	☐	☐	

2. Purpose and baseline

If you did not measure before, you cannot claim after. Many organisations buy automation without knowing what problem it was meant to solve.

Ref	Question	Yes	Part	No	N/A	Owner and notes
2.1	For each AI use, we can state in one sentence the problem it is meant to solve. <i>Evidence: Decision record for each use.</i>	☐	☐	☐	☐	
2.2	We recorded baseline measures before it went live: time to fill, cost per hire, conversion at that stage, offer acceptance, candidate drop-out and hiring manager satisfaction. <i>Evidence: Baseline figures with dates.</i>	☐	☐	☐	☐	
2.3	We recorded a quality of hire measure we trust, such as first-year retention or manager-rated performance, for the relevant hires. <i>Evidence: Defined measure and data source.</i>	☐	☐	☐	☐	

Ref	Question	Yes	Part	No	N/A	Owner and notes
2.4	We decided in advance what result would make us change or switch off the tool. <i>Evidence: Stop conditions in the decision record.</i>	☐	☐	☐	☐	
2.5	We asked whether the step should exist at all before we automated it. <i>Evidence: Note of the process review.</i>	☐	☐	☐	☐	
2.6	We compare results with the baseline at least every six months. <i>Evidence: Dated review notes.</i>	☐	☐	☐	☐	

PRIORITY SECTION

3. Lawful and fair

This is where regulators, and increasingly courts, are looking. A No here is the first thing to fix.

Ref	Question	Yes	Part	No	N/A	Owner and notes
3.1	We have decided, and written down, whether each tool makes or materially shapes decisions with a significant effect on candidates, such as sifting out, ranking or rejecting them. <i>Evidence: Documented automated decision-making assessment per tool.</i>	☐	☐	☐	☐	
3.2	Where the tool involves automated decision-making or profiling, we have completed a data protection impact assessment. The ICO has said one is likely to be needed. <i>Evidence: Completed DPIA with sign-off date.</i>	☐	☐	☐	☐	
3.3	We have identified a lawful basis for each purpose the tool processes data for. <i>Evidence: Record of processing.</i>	☐	☐	☐	☐	
3.4	Candidates are told before or at application that automated tools are used, what they do, and how to challenge a decision. <i>Evidence: Privacy notice wording and where candidates see it.</i>	☐	☐	☐	☐	
3.5	Candidates can ask for a human to review an automated outcome. We have a process, an owner and a timescale, and we have tested it. <i>Evidence: Written process and a test log.</i>	☐	☐	☐	☐	
3.6	We monitor outcomes at each automated stage for adverse impact against protected groups, where we can lawfully collect the data, on a set schedule. <i>Evidence: Monitoring reports and dates.</i>	☐	☐	☐	☐	
3.7	We have considered whether any tool uses or infers special category data, for example from voice, face or behaviour, and what legal conditions apply. <i>Evidence: Vendor confirmation and legal advice note.</i>	☐	☐	☐	☐	

Ref	Question	Yes	Part	No	N/A	Owner and notes
3.8	We have considered reasonable adjustments for disabled candidates in each automated stage, and candidates know how to ask for one. <i>Evidence: Adjustment process and candidate-facing wording.</i>	☐	☐	☐	☐	
3.9	If we hire into the EU or use tools sold there, we have mapped our tools to the EU AI Act and have a plan for the December 2027 high-risk date and the Article 50 transparency duties already in force. <i>Evidence: Mapping document and plan.</i>	☐	☐	☐	☐	

PRIORITY SECTION

4. Human involvement that counts

The ICO is clear that a token human step does not turn an automated decision into a human one. Research also shows that people tend to mirror the bias of a recommendation in front of them.

Ref	Question	Yes	Part	No	N/A	Owner and notes
4.1	Reviewers have the information, authority and time to change an outcome before it takes effect. <i>Evidence: Role description and observed review times.</i>	☐	☐	☐	☐	
4.2	Reviewers have been trained on what the tool does, what it cannot do, and automation bias. <i>Evidence: Training record.</i>	☐	☐	☐	☐	
4.3	Human review is applied consistently to every candidate at that stage, not just some. <i>Evidence: Process rule and sample check.</i>	☐	☐	☐	☐	
4.4	We record when reviewers overrule the tool, and we look at the pattern. If nobody ever overrules it, we ask why. <i>Evidence: Override log and review notes.</i>	☐	☐	☐	☐	
4.5	No candidate is rejected automatically without human review. If some are, we have treated it as a solely automated decision and applied the full safeguards. <i>Evidence: Process map showing where rejections occur.</i>	☐	☐	☐	☐	

5. Candidate experience and access

Only about a quarter of candidates trust AI to assess them fairly. A process that candidates distrust loses people, sometimes at the offer.

Ref	Question	Yes	Part	No	N/A	Owner and notes
5.1	Every candidate can reach a human and knows how. <i>Evidence: Contact route in the application journey.</i>	☐	☐	☐	☐	

Ref	Question	Yes	Part	No	N/A	Owner and notes
5.2	We tell candidates what AI use we expect from them and what we consider unacceptable in applications and assessments. <i>Evidence: Candidate-facing guidance.</i>	☐	☐	☐	☐	
5.3	We have tested automated stages for accessibility, including screen readers, neurodivergent candidates, non-native speakers and video or voice interaction. <i>Evidence: Testing notes.</i>	☐	☐	☐	☐	
5.4	We track drop-out and candidate feedback at each automated stage, and act on it. <i>Evidence: Stage-level dashboard.</i>	☐	☐	☐	☐	
5.5	Rejection and feedback messages are reviewed and written to be honest, not sent as unchecked template text. <i>Evidence: Sample of sent messages.</i>	☐	☐	☐	☐	

6. Fraud and verification

Gartner predicts that by 2028 one in four candidate profiles worldwide will be fake, and 6% of candidates surveyed admitted to interview fraud. Verification at the end of the process arrives after the decision has formed.

Ref	Question	Yes	Part	No	N/A	Owner and notes
6.1	We verify identity before an offer and, for remote or higher-risk roles, earlier in the process. <i>Evidence: Verification steps by role type.</i>	☐	☐	☐	☐	
6.2	At least one assessment stage produces evidence gathered live or under consistent conditions, not only submitted documents or recorded answers. <i>Evidence: Assessment design.</i>	☐	☐	☐	☐	
6.3	Interviewers know the signs of proxy interviewing and real-time AI assistance and know how to escalate without accusing an honest candidate. <i>Evidence: Guidance and briefing record.</i>	☐	☐	☐	☐	
6.4	Roles with access to sensitive systems or data have added verification. <i>Evidence: Role risk categories.</i>	☐	☐	☐	☐	
6.5	We log suspected fraud, and review it for patterns. <i>Evidence: Incident log.</i>	☐	☐	☐	☐	

7. Vendors and contracts

US litigation such as *Mobley v Workday* suggests you cannot assume the vendor carries the risk of a tool you chose and relied on. Your contract and your evidence trail need to say who does.

Ref	Question	Yes	Part	No	N/A	Owner and notes
7.1	We have read the vendor's bias testing: method, data, results by group, and date. It is not just a marketing statement. <i>Evidence: The vendor's documentation on file.</i>	☐	☐	☐	☐	
7.2	The contract covers whether our candidate data trains any models, retention periods, sub-processors and international transfers. <i>Evidence: Contract clauses.</i>	☐	☐	☐	☐	
7.3	We have audit or information rights, and the vendor must tell us about material model changes. <i>Evidence: Contract clauses.</i>	☐	☐	☐	☐	
7.4	The vendor supports us with candidate rights requests, DPIAs and regulatory enquiries, and the contract says how. <i>Evidence: Contract clauses and support process.</i>	☐	☐	☐	☐	
7.5	We have an exit plan, with data return and deletion terms. <i>Evidence: Exit clause and plan.</i>	☐	☐	☐	☐	

8. Capability and governance

Tools change. The people and habits around them are what keep hiring fair and effective. The aim is to be able to run a good process without a supplier holding your hand.

Ref	Question	Yes	Part	No	N/A	Owner and notes
8.1	One named person is accountable for AI in hiring and has authority to pause a tool. <i>Evidence: Role description or governance record.</i>	☐	☐	☐	☐	
8.2	Recruiters and hiring managers are trained in structured, evidence-based selection that works regardless of tooling. <i>Evidence: Training records.</i>	☐	☐	☐	☐	
8.3	We have a written policy on acceptable AI use by our own hiring teams, and it has been communicated. <i>Evidence: Policy and communication record.</i>	☐	☐	☐	☐	
8.4	There is an escalation route for suspected bias, errors or complaints, and people know it. <i>Evidence: Route and examples of use.</i>	☐	☐	☐	☐	

Ref	Question	Yes	Part	No	N/A	Owner and notes
8.5	Leadership sees a short report on AI in hiring at least once a year. <i>Evidence: Report and date.</i>	☐	☐	☐	☐	

Your action summary

List the gaps that matter most, starting with any No in sections 3 and 4. Be specific about the action and honest about the date.

Ref	Gap and action	Owner	Due	Status

Review schedule

Date completed	Completed by	Sections with a No	Next review

Next steps

Use the AI Hiring Tool Decision Record and Vendor Question Set to document each use and to test each supplier. Read The Signal Problem for the evidence behind these questions.

If you would like an independent view of how AI and automation are working in your hiring, and whether it passes the Beta Test, speak to MβB through the contact page of the site you downloaded this from.