



GUIDE

Opening Doors: Responsible Use of AI in Recruitment

Supporting employers to implement fair, transparent and inclusive AI-enabled hiring practices.

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Supporting employers to implement fair, transparent and inclusive AI-enabled hiring practices.

As part of the 2026 update to the [Opening Doors Framework](#), Business in the Community (BITC) has introduced new actions on the use of Artificial Intelligence (AI) in recruitment.

Responsible use of AI in recruitment does not begin with recruitment itself. Practices should be embedded within an organisation's broader approach to AI governance, ensuring that the principles, controls and accountabilities applied to AI across the business are consistently reflected in hiring practices.

This guide applies BITC's Responsible AI Framework specifically to recruitment. It should be used alongside the framework's foundational guidance on AI ethics, governance and strategy, rather than as a standalone compliance checklist or legal standard. Organisations should begin with the foundational guidance and then prioritise the recruitment actions that are most material to their people, operations and value chain.ⁱ

AI is increasingly used across hiring processes—from job design and sourcing

to screening, interview assessment and feedback. While it offers opportunities for efficiency and scale, it also introduces risks to fairness, inclusion and trust if not used responsibly.

The two new actions on the responsible use of AI-enabled recruitment tools are:

5g - Perform assurance reviews before procuring or using AI-enabled recruitment tools, take action where needed, and monitor regularly.

5h - Be clear with candidates about how AI is used in your recruitment process and how candidates may use AI.

This guide supports employers to implement the new actions by:

- Clarifying what each action means in practice
- Setting out minimum expectations and leading practice
- Providing practical steps and examples
- Signposting further guidance

This guide will support senior leaders and teams in human resources (HR), talent acquisition, workforce planning, learning and development, equity, diversity and inclusion (EDI), procurement, legal, data protection and information security to review, implement and strengthen responsible AI practices in recruitment.

Opening Doors Framework: Responsible Use of AI in Recruitment

Key Definitions

- **AI in recruitment:**
Use of AI-enabled tools to support hiring activities and decisions, including screening, assessment and job advert generation.
- **AI-enabled tools:**
Technologies that use machine learning, generative AI, natural language processing, computer vision or other AI techniques to generate content, make predictions, recommend actions or support decisions in recruitment. Rules-based automation should be included where it materially influences candidate outcomes or forms part of an AI-enabled process.
- **Assurance review:**
A proportionate, documented assessment of an AI use case across its lifecycle, covering purpose, necessity, data protection, equality, human rights, security, accuracy, explainability, accessibility and operational impacts. It may draw on several complementary instruments, such as a Data Protection Impact Assessment, Equality Impact Assessment, Algorithmic Impact Assessment, security assessment and supplier review; completing one instrument does not automatically address every risk.

- **Transparency:**
Clear communication to candidates about how AI is used and how decisions are made
- **Human-in-the-loop:**
Where AI supports recruitment processes, but humans remain responsible for reviewing outputs, making decisions, and intervening where necessary to ensure fairness, accuracy and inclusion

Why This Matters

AI does not remove bias by default. Without appropriate oversight, it can replicate or amplify existing inequalities, including those affecting ethnically diverse candidates and other underrepresented groups.ⁱⁱ

Evidence from regulators and research highlights that:

- Recruitment tools can filter or infer sensitive characteristics, risking discrimination
- Lack of transparency can reduce candidate trust and understanding
- Automated processes may disadvantage candidates with non-traditional experience, limited digital access or low digital confidence

At the same time, responsible use of AI can:

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- Improve consistency and efficiency
- Support more structured decision-making
- Enable better candidate experiences when used transparently and inclusively

For employers, these practices are not only safeguards. Effective assurance can identify costly problems before tools are procured or deployed, reduce duplicated checks and avoid inefficient or unsuitable systems. Clear governance and monitoring can also help employers use AI with greater confidence, improve recruitment efficiency and consistency, protect organisational reputation, and reduce legal, regulatory and supplier risks. Transparent, inclusive practice can strengthen candidate trust and employer brand, widen access to talent and help organisations compete for candidates who expect their values to be reflected in how technology is used.

Responsible recruitment practice also depends on AI literacy. Recruiters, hiring managers, procurement teams and candidates should be given accessible guidance on safe and acceptable AI use, including data protection, verification of outputs, bias, limitations and escalation routes. Ideally, learning should build confidence as well as capability, with targeted support for people and communities at greater risk of digital

exclusion, while preserving human judgement, critical thinking, creativity and problem-solving.

Employers are expected to remain attentive, intentional and adaptive in their use of AI, recognising that both employer and candidate use of AI is evolving. Transparency and fairness are ongoing responsibilities—not one-off checks. Practices should be reviewed regularly.

The New Actions at a Glance

Action	Core Aim	Starting	Fully Embedded
5g	Assure AI tools	Risk assessed before use	Human-in-the-loop governance, regular assurance reviews and ongoing monitoring
5h	Transparency	Basic disclosure to candidates	Clear, accessible and candidate-centred communication

Action 5g – Assurance & Ongoing Monitoring

What this means

Before focusing on individual recruitment tools, organisations should map all AI use across recruitment, including AI embedded

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in third-party systems and tools adopted informally. Relevant uses should be recorded in existing risk registers, supported by documented principles, proportionate data protection and algorithmic impact assessments, clear senior ownership, and cross-functional oversight. Governance should also address cybersecurity, reporting and escalation routes, system changes, boundaries for autonomous or agentic systems, and feedback from candidates, employees and other affected stakeholders.

Employers should understand how AI tools work and assess their impact on fairness, accuracy and inclusion before use, and continue to monitor them over time.

Starting

- Conduct assurance reviews using complementary assessments as appropriate, such as Data Protection Impact Assessments (DPIAs), Equality Impact Assessments and Algorithmic Impact Assessments
- Assess tools before procurement and deployment
- Carry out supplier due diligence (data provenance and quality, bias testing, explainability, data protection, cybersecurity, system updates, human oversight arrangements, and subcontractors)

- Assign clear internal accountability
- Monitor outcomes regularly and act on identified issues

Fully Embedded

- Implement continuous monitoring and periodic independent audits
- Test outcomes across diverse demographic groups using appropriate data
- Enable candidate contestability (ability to challenge decisions)
- Embed AI governance within wider organisational risk and EDI frameworks

Action 5h – Transparency with Candidates

What this means

Candidates should always understand when and how AI is used in recruitment, and what is expected of them.

Starting

- Inform candidates when AI is used
- Explain where and why it is used in each stage of the process
- Provide guidance on acceptable candidate use of AI (e.g. applications, assessments)

Fully Embedded

- Use accessible explanations in plain English

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- Provide candidates with options or adjustments where possible
- Offer clear routes for questions or challenges
- Ensure consistency of messaging across all recruitment stages

Leading practice spotlight:

United Utilities builds transparency and trust through clear guidance on AI use in recruitment

As the use of AI in recruitment continues to evolve, United Utilities has taken practical steps to increase transparency and provide clearer guidance for candidates on how AI is used throughout the recruitment process. Through publicly available guidance, the organisation explains where AI supports recruitment activities, how candidates may use AI responsibly when applying for roles, and where applicants are expected to rely on their own skills and experiences. The guidance also sets out how candidates can request support or adjustments where needed.

The organisation is clear that AI is used to support elements of the recruitment process, including drafting job descriptions, managing candidate communications and supporting interview preparation. However, it also emphasises that technology is intended to enhance efficiency and candidate experience rather

than replace human judgement.

Recruitment decisions remain people-led, helping ensure candidates are assessed on their skills, experiences and potential. The organisation has also publicly communicated that every application is reviewed individually by a member of its recruitment team and that AI should be used by candidates as a support tool when preparing applications rather than a substitute for their own experience and achievements — reinforcing its commitment to transparency and human oversight throughout the recruitment process.

While responsible AI remains a rapidly developing area for employers across all sectors, United Utilities' approach demonstrates how organisations can begin implementing the principles of transparency, fairness and human oversight in practical ways. By clearly communicating expectations around AI use and maintaining a focus on candidate experience, the organisation provides a useful example of how employers can build trust and confidence while continuing to learn and adapt as technologies and expectations evolve.ⁱⁱⁱ

See the two videos **in which** United Utilities describes **its** recruitment process:

[Video 1](#) and [Video 2](#).

Common Risks & Pitfalls

The most significant risks arise when employers fail to govern, understand and communicate their use of AI in recruitment effectively. Common pitfalls include:

- Treating AI use in recruitment as a standalone activity, rather than embedding it within robust organisation-wide AI governance, risk assessment and EDI frameworks.
- Assuming AI is neutral or inherently fair, rather than testing outcomes for bias and adverse impacts across different candidate groups.
- Using tools without sufficient internal understanding or supplier due diligence, including how data is sourced, how outputs are produced, and how system updates may alter performance or risk.
- Omitting information about AI use, or providing incomplete, inaccessible or inconsistent information across recruitment stages, without clear routes for candidates to ask questions, request adjustments or challenge decisions.
- Over-relying on automation without meaningful human oversight, regular monitoring or prompt intervention when unfair, inaccurate or exclusionary outcomes emerge.

Getting Started: First 90 Days

Prioritise Action 5g: Assurance & Monitoring

- Assign ownership and accountability for AI-enabled recruitment tools.
- Audit current and planned use of AI across recruitment.
- Map all AI tools and suppliers used throughout the recruitment process.
- Introduce supplier due diligence and assurance reviews.
- Establish processes to monitor fairness, accuracy, bias and performance, with defined review cycles and corrective actions.
- Engage relevant teams including HR, Talent Acquisition, Procurement, Legal, Data Protection, Information Security and EDI.

Prioritise Action 5h: Transparency

- Review what candidates are currently told about AI use and identify gaps.
- Introduce candidate transparency statements at relevant stages of the recruitment process.
- Create candidate-facing guidance explaining how AI is used and how candidates may use AI appropriately.
- Ensure candidates know how to seek clarification, request adjustments or challenge decisions where appropriate.

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- Train recruiters and hiring managers to explain AI use confidently and consistently.

Tools & Resources

As a starting point, we recommend the following resources:

- **BITC:**
[Responsible AI Framework \(2026\)](#) – primary guidance on responsible AI across business, including employment, skills and inclusion
- **UK Government Department for Science, Innovation and Technology:**
[Responsible AI in recruitment guidance](#)
- **Information Commissioner's Office (ICO):**
[Guidance on AI and data protection](#), [Recruitment rewired: an update on the ICO's work on the fair and responsible use of automation in recruitment](#) and [Thinking of using AI to assist recruitment? Our key data protection considerations](#)

- **National Institute of Standards and Technology (NIST), U.S. Department of Commerce:**
[AI Risk Management Framework](#)
- **Chartered Institute of Personnel and Development (CIPD):**
[Using AI responsibly in people management](#) and [Briefing: Refining guidance on AI in recruitment and growing digital expertise](#)
- **Equality and Human Rights Commission (EHRC):**
[New guidance on AI and equality available to public sector bodies](#)

AI is a rapidly evolving area. Employers should regularly review emerging guidance and seek expert support where needed.

Join the Network and Learn More

If your organisation is not yet an Opening Doors signatory, [join our network](#) to access practical resources, tailored support and opportunities to learn from peers.

ⁱ BITC, *Responsible Business in an AI World*, 2026: <https://www.bitc.org.uk/responsible-ai/#explore>.

ⁱⁱ Department for Science, Innovation and Technology (DSIT), *Responsible AI in Recruitment*, 2024, https://assets.publishing.service.gov.uk/media/65fd a1b9f1d3a0001132ae5b/Responsible_AI_in_Recruitment.pdf.

ⁱⁱⁱ United Utilities. *Doing the Right Thing in the Application and Interview Process*. Available at: <https://www.unitedutilities.com/corporate/careers-faqs/application-faqs/doing-the-right-thing-in-the-application-and-interview-process/>.

United Utilities. *Careers at United Utilities*. Available at: <https://www.unitedutilities.com/corporate/careers/>.

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Laura Kurfurst, Talent Acquisition Partner, United Utilities. *Top Tips for success when applying to our vacancies here at United Utilities - Part 1*, 2025 (LinkedIn video). Available at: <https://lnkd.in/p/eRCDUwcq>.

Laura Kurfurst, Talent Acquisition Partner, United Utilities. *Top tips for your job application with United Utilities - Part 2*, 2026 (LinkedIn video). Available at: <https://lnkd.in/p/euhR7nmg>.



Business in the Community (BITC) champions responsible business as essential for long term economic growth and resilience. We convene, campaign, and consult with business to tackle society's most pressing challenges—from climate change and place-based regeneration to inequality, workplace wellbeing, and inclusive growth.

Founded by His Majesty King Charles III in 1982, BITC has over four decades of experience in engaging business and delivering measurable impact in both business and in communities through evidence-based interventions. As a trusted partner to business and government, BITC convenes leadership, influences policy, and accelerates action—helping shape a future-ready economy that works for everyone.

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