



AI in staffing and the EU AI Act

What retail chains should have in place before the high-risk requirements apply in December 2027.

TIMELINE

-  **2 Feb 2025** Prohibited AI practices and the AI literacy duty (Art. 4) apply in the EU.
-  **2 Aug 2025** Rules for general-purpose AI models apply.
-  **27 Jul 2026** The Digital Omnibus on AI, Regulation (EU) 2026/1744, enters into force.
-  **2 Aug 2026** Transparency duties (Art. 50) apply.
-  **2 Dec 2027** **Requirements for high-risk AI in Annex III apply, including AI used in employment.**
-  **2 Aug 2028** Requirements for high-risk AI in regulated products (Annex I) apply.

Norway. The AI Act is not yet part of the EEA Agreement, so it has no direct legal effect in Norway yet. The government aims to present a bill in spring 2027. Chains with operations or employees in the EU must follow the EU rules there.

IS YOUR STAFFING AI HIGH-RISK?

Annex III, point 4 covers AI intended to make decisions that affect work relationships, to allocate tasks based on individual behaviour or personal traits, or to monitor and evaluate the performance and behaviour of employees.

A demand forecast based on aggregated store traffic and sales has a different purpose than a system that assesses individual employees. Assess each function separately.

**CHECKLIST**

- ☐ **Map** every AI function used in staffing: forecasting, scheduling and performance follow-up.
- ☐ **Describe** the purpose of each function and which data it uses.
- ☐ **Separate** store-level forecasts based on aggregated data from functions that assess individual employees.
- ☐ **Keep a human in control:** the store manager approves the plan and can override suggestions.
- ☐ **Inform employees** about which systems are used, for what purpose and which data they process.
- ☐ **In Norway, discuss control measures** with employee representatives as early as possible (Working Environment Act § 9-2).
- ☐ **Check the legal basis and information duty** under the GDPR, and carry out a data protection impact assessment where employees are monitored (Art. 35).
- ☐ **Avoid fully automated decisions** with legal or similarly significant effects for employees (GDPR Art. 22).
- ☐ **Secure data quality**, data minimisation and access control.
- ☐ **Keep logs and documentation** of the system, data sources and changes.
- ☐ **Support AI literacy** among managers and planners (AI Act Art. 4).
- ☐ **Ask your vendor for documentation:** purpose, data, accuracy, human oversight and plans for AI Act compliance.

HOW RIAS FITS

RIAS forecasts demand from aggregated store data, such as traffic and sales, and suggests staffing per hour. The store manager makes the final decision. Performance features that follow up individual employees should be assessed separately in your organisation.