



Staff Committee

MEMORANDUM

From : Staff Committee

To : [REDACTED]

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Subject: Use of artificial intelligence tools in recruitment procedures

The Staff Committee has noted with concern an [article published on 15 June 2026](#) on the European news website Euractiv describing the development, under the auspices of the Commission and EPSO, of an artificial intelligence (AI) tool designed to assist in selection procedures.

According to the article, the tool, known as the 'Job Matching Application', is reportedly based on a language model (LLM) developed by the company Anthropic, and is to be implemented by Accenture and hosted on an Amazon Web Services cloud infrastructure.

The Committee is aware of the challenges facing the European institutions in light of the increasing number of applications and the need to modernise recruitment procedures. Recruitment nevertheless plays a key strategic role, as it serves to select the individuals who will be called upon to participate, directly or indirectly, in the functioning of the Union's institutions and bodies.

As representatives of the staff of the Union's judicial institution, we therefore consider it necessary to draw your attention once again to several issues raised in the article, which we believe warrant thorough examination before the institution participates in or makes use of such a system.

Indeed, given that the European Union's civil service recruitment procedures must ensure compliance with the principles of equal treatment, non-discrimination, transparency and sound administration, as well as a high level of protection of personal data, we have particular concerns regarding:

i/ the transparency of the criteria applied by language models: even where a final decision is formally taken by a human being, the influence exerted by a system that ranks and recommends candidates may in reality be decisive; it is therefore essential to be able to understand, explain and monitor the criteria that led to the assessment of candidates;

ii/ the issue of algorithmic bias: in this regard, Regulation (EU) 2024/1689 of the European Parliament and of the Council of 13 June 2024 establishing harmonised rules on artificial intelligence (the AI Act) classifies AI systems used for the recruitment and selection of individuals as high-risk systems and places particular emphasis on the requirements for human oversight, transparency and risk management applicable to AI systems. Experience has indeed shown that AI systems can replicate or amplify certain biases present in the data they use. More generally, the use of generative language models raises numerous questions regarding reliability and

explainability. However, EU courts must be particularly vigilant in this regard, given the requirements of equal treatment and non-discrimination to which they are subject and which they are responsible for enforcing.

iii/ issues of digital sovereignty linked to the use of a tool that relies on components developed, operated or hosted by non-European companies: these raise questions regarding control over data and the strategic autonomy of the EU institutions. The Commission states that candidates' data will not be used to train models; yet the mass transfer of personal data to companies that are already threatening the EU's sovereignty – particularly for the purpose of carrying out high-risk processing operations to select future officials and staff – strikes us as highly problematic and legitimately raises the question of whether it is justified to entrust such a sensitive task to actors outside the EU.

This issue is all the more relevant given that the European institutions are encouraging the development of European digital capabilities and regularly emphasise the need to reduce strategic dependence on non-European suppliers.

A further question warrants consideration. The EU's courts will undoubtedly be called upon to hear disputes concerning the use of AI in staff selection, and to clarify the requirements arising from the principles of transparency, non-discrimination and human oversight. In this context, one might question whether it is appropriate for the institution itself to participate in the roll-out of such tools, given that, until now, it has taken care to retain a certain degree of control over the tools it uses.

On the basis of these considerations, the Committee would like to know what information the institution has regarding the implications of using the 'Job Matching Application' tool in the selection procedures organised by EPSO in which it participates and in the context of which this tool might be used.

In particular, it would like to know whether a specific risk assessment has been carried out, whether the Data Protection Officer's opinion has been sought and, more generally, whether the implications of using this tool have been analysed in advance. In this regard, has a data protection impact assessment been carried out in accordance with Regulation (EU) 2018/1725? What safeguards are in place to ensure transparency, human oversight and traceability? How is control over candidates' personal data ensured, and how is it guaranteed that such data will not be transferred to data processors?

The Staff Committee regrets that the Commission, whilst working to develop a legal framework designed to protect digital sovereignty and fundamental rights, has simultaneously launched a project that jeopardises them. It also regrets that the existence of this project was only revealed at an advanced stage, thereby presenting the stakeholders and candidates concerned with a fait accompli.

Given the stakes involved, which go far beyond mere technical or organisational considerations and touch upon the fundamental principles governing the European civil service, the Committee would appreciate being involved in the discussions on this matter, as well as in any steps taken by the institution in this regard.



Vice-Chair