



**AiDact**

EU AI ACT COMPLIANCE, SIMPLIFIED

# AI COMPLIANCE PACK

EU AI Act · Regulation (EU) 2024/1689

<b>Organisation</b>	Meridian Consulting Group
<b>Risk Classification</b>	<b>High Risk</b>
<b>Documents Included</b>	5 Documents
<b>Date Generated</b>	10 April 2026
<b>Version</b>	1.0

Generated by AiDact · aidact.eu · This document is a compliance starting point and does not constitute legal advice.

## Executive Summary

---

**Risk Classification: High Risk** — Meridian Consulting Group operates an automated CV screening tool that falls under Annex III of the EU AI Act as a high-risk AI system used in employment and recruitment decisions. While human oversight is maintained, the use of AI in personnel selection triggers the full obligations under Chapter III, including technical documentation, conformity assessment, and registration in the EU database. The use of ChatGPT for legal summaries also engages transparency obligations under Article 50.

This compliance pack has been generated for Meridian Consulting Group based on the AI systems and use cases described during intake.

*This document is a compliance starting point and does not constitute legal advice.*

# 1. AI Use Policy

---

Meridian Consulting Group · Version 1.0 · 10 April 2026

## Purpose and Scope

This AI Use Policy governs the use of artificial intelligence tools and systems by Meridian Consulting Group employees, contractors, and third parties acting on behalf of the organisation. It applies to all AI systems deployed within the organisation, including but not limited to ChatGPT, Microsoft Copilot, and automated recruitment screening tools. The policy is designed to ensure compliance with the EU AI Act (Regulation (EU) 2024/1689) and related data protection legislation including GDPR. All staff who use AI tools in the course of their work are bound by this policy and must complete mandatory AI literacy training as required under Article 4 of the EU AI Act. This policy will be reviewed annually or following any significant change in AI usage or regulation.

## Permitted Uses of AI

AI tools may be used to draft and edit client communications, internal documents, and legal summaries, provided all outputs are reviewed and approved by a qualified professional before use. Microsoft Copilot may be used to assist with document review, research, and productivity tasks under the supervision of responsible staff. The automated CV screening tool may be used to assist in the initial review of job applications, provided human reviewers make all final hiring decisions and candidates are informed of the use of automated processing. AI-generated content must be clearly identified as such in internal workflows. Staff may not use AI tools to process special category personal data without explicit authorisation from the Data Protection Officer.

## Prohibited Uses of AI

The use of AI to make fully automated decisions about individuals without human review is strictly prohibited, particularly in the context of recruitment, performance management, or client assessment. AI tools must not be used to generate legal advice or opinions that are provided directly to clients without review and sign-off by a qualified solicitor. The use of AI systems to conduct biometric identification, emotion recognition, or social scoring is prohibited. Staff must not input confidential client data, personal data, or commercially sensitive information into consumer AI tools such as ChatGPT without confirming that the tool's data retention and privacy settings comply with the organisation's data protection obligations. Any AI use that may constitute a prohibited practice under Article 5 of the EU AI Act is strictly forbidden.

## Human Oversight Requirements

All AI-assisted outputs must be reviewed by a qualified human professional before being acted upon, shared externally, or used in any decision-making process. For the automated CV screening tool, a designated HR professional must review all AI-generated shortlists before candidates are progressed or rejected. Employees using AI for legal research or document drafting must verify the accuracy, completeness, and appropriateness of all outputs. The organisation maintains a register of AI systems in use and assigns a responsible owner to each system. Any AI output that cannot be verified or that conflicts with professional judgement must be escalated and not acted upon without explicit authorisation.

## Data Protection and Privacy

All AI systems used by Meridian Consulting Group must be operated in compliance with GDPR and the Data Protection Acts. Personal data may only be processed through AI systems where a lawful basis exists and has been documented in the organisation's data processing register. Candidates whose CVs are processed by the automated screening tool must be informed of this in the organisation's privacy notice and provided with the right to request human review of any automated decision under Article 22 GDPR. Staff must not upload personal data to external AI tools unless confirmed to be permissible under the organisation's data protection policies. Data minimisation principles

apply — only the minimum necessary data should be input into any AI system.

## Transparency and Disclosure

Meridian Consulting Group is committed to transparency in its use of AI. Where AI tools have been used to generate client-facing content, this must be disclosed to the relevant supervising partner. Clients must be informed where AI has materially contributed to work product, in accordance with professional conduct obligations. Candidates subject to automated CV screening must be informed of this fact and of their rights in relation to such processing. The organisation will maintain an up-to-date register of AI systems in use, their purpose, risk classification, and responsible owner. This register will be available to the Data Protection Officer and relevant regulatory authorities upon request.

## Incident Reporting

Any incident involving AI systems — including unexpected outputs, data breaches, discriminatory outcomes, or system failures — must be reported immediately to the designated AI Responsible Officer and the Data Protection Officer. Incidents involving personal data breaches must be assessed for notification obligations under GDPR within 72 hours. For high-risk AI systems including the CV screening tool, serious incidents must be reported to the relevant national market surveillance authority in accordance with Article 73 of the EU AI Act. An incident log will be maintained by the AI Responsible Officer and reviewed quarterly. Staff who identify potential AI-related incidents are protected from retaliation when reporting in good faith.

## Policy Review

This policy will be reviewed annually by the AI Responsible Officer and the Data Protection Officer, or sooner if there are material changes to the organisation's AI systems, relevant legislation, or regulatory guidance. All staff will be notified of updates to this policy and must acknowledge receipt. Version history will be maintained. The next scheduled review is April 2026. Employees with questions about this policy should contact the AI Responsible Officer at the details provided in the organisation's staff handbook.

## 2. AI Risk Register

Meridian Consulting Group · Version 1.0 · 10 April 2026

This risk register documents the key AI-related risks identified for Meridian Consulting Group based on its current use of ChatGPT, Microsoft Copilot, and an automated CV screening tool. Risks have been assessed in terms of likelihood and impact, and assigned to responsible owners with mitigation actions. This register should be reviewed quarterly and updated following any change in AI systems or use cases. High-risk items require immediate attention and escalation to senior management.

Risk	Category	Likelihood	Impact	Rating	Owner	Mitigation
<b>Discriminatory CV screening outcomes</b>	Legal / Regulatory	Medium	High	High	HR Director	Conduct bias audit of screening tool, implement mar
<b>Confidential client data input into ChatGPT</b>	Data Protection	Medium	High	High	Data Protection Office	Implement technical controls to prevent upload of co
<b>AI-generated legal content used without adequate review</b>	Professional Liability	Medium	High	High	Managing Partner	Mandatory sign-off workflow requiring partner review
<b>Non-compliance with EU AI Act high-risk obligations</b>	Regulatory	High	High	High	AI Responsible Officer	Complete conformity assessment for CV screening t
<b>Failure to inform candidates of automated processing</b>	Data Protection	High	Medium	Medium	HR Director	Update recruitment privacy notice, add disclosure to
<b>AI literacy gaps among staff</b>	Operational	High	Medium	Medium	HR Director	Implement mandatory AI literacy training programme

### 3. Gap Analysis

Meridian Consulting Group · Version 1.0 · 10 April 2026

This gap analysis assesses Meridian Consulting Group's current compliance posture against the requirements of the EU AI Act. The organisation's use of an automated CV screening tool classifies it as a deployer of a high-risk AI system under Annex III, triggering the most extensive set of obligations. Significant gaps have been identified in technical documentation, conformity assessment, and candidate transparency. Priority remediation should focus on the high-risk CV screening system ahead of the August 2026 enforcement deadline.

Area	Article	Current State	Requirement	Gap	Action Required
AI Literacy	Art. 4	No formal AI literacy training for staff working with AI systems	All staff working with AI systems must have appropriate AI literacy	High	Develop and provide mandatory AI literacy training for all relevant staff
High-Risk System Documentation	Art. 11 & Annex III	No technical documentation exists for the CV screening tool	Technical documentation must be prepared before deploying a high-risk AI system	High	Prepare and maintain comprehensive technical documentation for the CV screening system
Conformity Assessment	Art. 43	No conformity assessment has been conducted	High-risk AI systems require conformity assessment	High	Engage with a notified body to obtain conformity assessment for the CV screening system
Candidate Transparency	Art. 50 & Art. 53	Privacy notice does not disclose AI use in CV screening	Individuals subject to high-risk AI decisions must be informed and job advertisement templates must be transparent	High	Update privacy notices and create transparent job advertisement templates for CV screening
Human Oversight Procedures	Art. 14	Ad hoc human review without documented procedure	High-risk AI systems must have human oversight procedures	Medium	Formalise and document human oversight procedures for CV screening
Incident Reporting	Art. 73	No AI-specific incident reporting procedure	High-risk AI systems must have incident reporting procedures	Medium	Establish AI-specific incident reporting procedure and integrate with existing IT incident response

## 4. Compliance Roadmap

Meridian Consulting Group · Version 1.0 · 10 April 2026

This compliance roadmap sets out a phased approach for Meridian Consulting Group to achieve full EU AI Act compliance. The roadmap prioritises immediate actions required under provisions already in force, followed by preparation for the August 2026 high-risk system deadline. Each phase is tied to a specific EU AI Act obligation date and assigns clear ownership and actions.

### Phase 1 — Immediate Actions

**Deadline: February 2025 (already in force)**

*Art. 4 AI Literacy & Art. 5 Prohibited Practices*

- Update candidate privacy notice to disclose automated CV screening
- Issue interim AI acceptable use guidance to all staff
- Appoint AI Responsible Officer and Data Protection Officer as joint owners
- Audit all AI tools in use and confirm no prohibited practices are deployed

### Phase 2 — Foundation

**Deadline: August 2025**

*Art. 4 AI Literacy obligations fully applicable*

- Deliver mandatory AI literacy training to all staff
- Establish AI systems register documenting all tools, owners, and risk classifications
- Implement formal human oversight procedure for CV screening tool
- Conduct initial bias assessment of CV screening outputs

### Phase 3 — High-Risk Compliance

**Deadline: August 2026**

*Full high-risk AI system obligations under Chapter III*

- Obtain and review technical documentation for CV screening tool from vendor
- Complete conformity assessment or obtain CE marking documentation
- Register CV screening system in EU AI Act database if required
- Implement post-market monitoring procedure for CV screening outcomes
- Complete annual AI policy review and update risk register

## 5. Controls Checklist

Meridian Consulting Group · Version 1.0 · 10 April 2026

The following controls must be implemented to achieve and maintain compliance.

#	Control	Description	Priority	Owner	Status
1	AI Literacy Training Programme	Develop and deliver mandatory AI literacy training covering EU AI Act obligations, acceptable use, data protection, and	Urgent	HR Director	Not Started
2	Candidate Disclosure Update	Update all recruitment privacy notices, job advertisements, and application forms to clearly disclose the use of automated	Urgent	HR Director	Not Started
3	AI Systems Register	Maintain a live register of all AI systems in use, including tool name, Responsible Officer, risk classification under EU AI Act	Urgent	IT Director	Not Started
4	Acceptable Use Policy	Publish and enforce an AI Acceptable Use Policy covering permitted and prohibited uses, data input restrictions, output	Urgent	Legal Director	Not Started
5	CV Screening Oversight Procedure	Document and implement a formal human oversight procedure for HR Director's CV screening tool. Assign a named HR	High	HR Director	Not Started
6	Technical Documentation Acquisition	Engage with the CV screening tool vendor to obtain the technical documentation required for compliance under Annex IV of the EU AI Act	High	IT Director	Not Started
7	AI Incident Reporting Procedure	Establish a documented procedure for reporting AI-related incidents, including data protection officer's output, data breaches, disc	High	Data Protection Officer	Not Started
8	Conformity Assessment Completion	Complete or obtain conformity assessment documentation for the AI system by the end of the August 2026 deadline	Urgent	AI Responsible Officer	Not Started