

White Paper:

AI in Recruitment from the Candidate Side

A detailed review of how a human-centred, AI-assisted career-guidance platform compares with the risks, safeguards, and recommendations identified in the 2026 academic study on AI in recruitment and selection in Belgium

1. Executive Summary

In February 2026, the Belgian study *Recrutement et sélection à l'ère de l'IA*, commissioned by the **Institut pour l'égalité des femmes et des hommes** and conducted by researchers from **Liège University (LENTIC, HEC-Liège)** and **Hasselt University (School voor Sociale Wetenschappen)**, examined the use of artificial intelligence in recruitment and selection in Belgium, the main risks involved, and the recommendations addressed to public authorities, organisations, and practitioners.

This white paper looks at that debate from the candidate side of the labour market. It reviews how **AICCA**, an AI-assisted career-guidance platform used by jobseekers and employment support professionals, compares with the risks and recommendations identified in the study, and where its design reflects a structurally different model of AI use.

The review supports five conclusions:

- **AICCA does not make decisions about individuals.** It generates draft materials that the jobseeker reviews, edits and decides whether to use. There is no scoring, no ranking, no automated rejection and no automated action taken outside the platform, in either guided or autonomous use.
- **Human oversight is structural, not procedural.** In guided use the support professional is in the loop by design; in autonomous use the jobseeker is the human in the loop, retaining full authority over every input and every output.
- **AICCA is more than a system that avoids reproducing bias: it is a tool that helps to counteract it.** By equipping jobseekers, including the most vulnerable, with high-quality application materials, AICCA works against self-exclusion and reduces a documented external penalty: linguistic errors in application materials measurably cost candidates interview opportunities, a disadvantage that falls hardest on those with limited command of the local language.
- **Transparency toward the user is built into the interface.** Every screen of the platform displays a notice that results are generated using AI and should be reviewed and edited before use, with a link to the Privacy Policy.
- **Equality by design is embedded in the prompt architecture.** AICCA's prompts are centrally curated and version-controlled, replacing the "shadow AI" pattern of ad-hoc personal prompting that the study identifies as a risk.

Section 2 sets out scope and positioning. Section 3 presents a structural alignment overview as a single comparison table. Section 4 describes how AICCA goes beyond what the study's recommendations call for. The annex provides a recommendation-by-recommendation walk-through.

2. AICCA's Position on the Candidate Side of Recruitment

AICCA is an AI-assisted career-guidance platform. Among other functions, it supports the preparation of CVs, cover letters and application emails, interview preparation, career exploration, and the identification of skills gaps.

The platform is used in two principal modes:

- guided use, in which a support professional (employment counsellor, job coach, caseworker, career advisor) operates AICCA together with a jobseeker, generally in session;
- autonomous use, in which the jobseeker uses the platform directly to prepare materials for their own job search.

AICCA is used across the full range of jobseeker profiles. In particular, it is deployed with vulnerable audiences, including migrants, low-literacy adults, long-term unemployed persons, NEETs and workers aged fifty and over, for whom the risks of self-exclusion and exposure to biased automated filtering on the employer side are most acute.

This positioning is structurally distinct from the systems examined by the study. The study analyses AI used by employers and recruitment intermediaries to attract, screen, score and select candidates. AICCA is used by the candidate side of the same market, by jobseekers themselves and by the professionals who support them, to prepare materials over which the candidate retains full authority.

Many of the risks mapped by the study (opacity, automated rejection, perpetuation of historical hiring patterns, displacement of human judgement) operate primarily in the employer-side context. AICCA's design avoids the structural conditions in which those risks materialise, and the safeguards it embeds were in place before the study's publication.

3. Structural Alignment Overview

The table below maps the principal dimensions raised by the study to AICCA's structural design. A recommendation-by-recommendation walk-through is provided in the annex.

Dimension raised by the study	Risk on the employer side (as documented by the study)	How AICCA is structured
Decision-making about individuals	Automated screening, scoring and ranking of candidates; risk of automated rejection (AI Act Annex III, high-risk).	No scoring, no ranking, no rejection. Outputs are draft materials returned to the jobseeker, who decides whether and how to use them.
Human oversight (AI Act Art. 14)	Often procedural; in some systems the human merely confirms an algorithmic recommendation.	Structural. In guided use the support professional is in the loop by design; in autonomous use the jobseeker is the human in the loop. Both inputs and outputs are under user control: the user chooses what information to enter, can edit any input before processing, and can edit, regenerate

Dimension raised by the study	Risk on the employer side (as documented by the study)	How AICCA is structured
		or discard any output before any external use.
Transparency toward the person concerned (AI Act Art. 26; GDPR Arts. 12–14)	Candidates are frequently unaware that AI is used in their evaluation.	A persistent on-screen notice informs every user that results are generated using AI and should be reviewed and edited, with a link to the Privacy Policy. Information about the AI processing is therefore always one click away from the user, in the interface itself.
Quality and curation of prompts	“Shadow AI”: individual recruiters using personal LLM accounts with uncurated prompts that may carry stylistic or demographic bias.	Prompts are centrally designed, version-controlled and shared across the platform. There is no “shadow” layer of personal prompting in operational use.
Reproduction of historical hiring patterns	Predictive matching trained on historical hiring data tends to reproduce the existing workforce profile.	AICCA does not perform predictive matching against employer hiring histories. It supports the jobseeker’s own preparation; no historical hiring dataset shapes who is recommended to whom.
Equality by design (study recommendation to developers)	Often retrofitted as a post-hoc audit.	Embedded at design level: every output is meant to support the jobseeker, including those most exposed to discrimination on the employer side. The design intent is to reduce self-exclusion and to translate non-standard career trajectories into legible application materials.
Counteracting bias, not only avoiding it	The study frames bias mitigation primarily as a constraint on employer-side systems.	<p>AICCA actively counteracts labour-market bias by giving all jobseekers access to the quality of application materials that, without such support, only the most privileged candidates could produce, and by helping them avoid self-exclusion.</p> <p>This mechanism is not hypothetical. A 2023 peer-reviewed experiment conducted with 445 genuine recruiters by Ghent University (Sterkens et al., <i>PLoS ONE</i>, 2023) demonstrated that resumes containing spelling errors receive significantly lower interview probabilities: two errors already reduce the probability of being invited to interview by 7.3 percentage points; five errors reduce it by 18.5 percentage points — an effect larger than any other applicant-side variable tested in the experiment, including student work experience and extracurricular activities. Critically, recruiters do not read these errors as mere typographical slips: the study shows they trigger negative inferences</p>

Dimension raised by the study	Risk on the employer side (as documented by the study)	How AICCA is structured
		<p>about the candidate’s interpersonal skills, conscientiousness and, most powerfully, mental ability — with perceived lower intelligence accounting for approximately 32% of the interview penalty. The penalty holds across both white-collar and blue-collar vacancies.</p> <p>For candidates whose written production in the local language is limited — migrants, low-literacy adults, persons with fewer educational resources — this represents a documented source of indirect disadvantage that operates before any employer-side AI system ever enters the picture. AICCA directly addresses that source: by supporting the production of linguistically correct, well-structured application materials, it reduces a measurable penalty that would otherwise fall disproportionately on the most vulnerable candidates.</p>
User agency over inputs	On the employer side, the candidate has little control over what data is processed about them.	On AICCA, no information is loaded automatically. The jobseeker, alone or with the support professional, chooses and may edit every input before it is processed. They may, if they prefer, omit name, gender or information that would directly or indirectly indicate age or origin (this is not the recommended setting, since output quality and ease of use depend on input quality, but the choice belongs to the user).
Data minimisation, security, lawful basis (GDPR Arts. 5, 6, 32)	Frequently under-documented in commercial recruitment AI.	Documented in the public Privacy Policy and in the DPIA Support Package provided to deploying organisations: EU-based hosting, role-based access, contractual safeguards with technical service providers, lawful bases identified per deployment context.
Traceability and journals (AI Act Art. 12)	Often opaque to the deployer organisation.	Session inputs and generated outputs are retained to allow continuity of guidance and retrospective review. The model used and the full exchange of information with the LLM are tracked, including both the inputs the jobseeker chose to share and the prompting layer designed by OrientaEuro. Prompt versions are tracked centrally.
Information of representatives and beneficiaries (AI Act Art. 26; CCT n°39 in Belgium)	Identified by the study as inconsistently applied.	In addition to the on-screen notice and Privacy Policy directed at the user, OrientaEuro provides deploying organisations with the DPIA Support Package

Dimension raised by the study	Risk on the employer side (as documented by the study)	How AICCA is structured
		to support their own information and consultation duties.
AI literacy of users (AI Act Art. 4)	Identified as a major gap; only 21% of organisations had taken AI Act-related measures, 41% did not know.	Support professionals (both within OrientaEuro and within external deployments) are onboarded and coached in responsible, human-centred, AI-supported career guidance, which incorporates the elements of AI literacy training proper. In guided use, the support professional in turn contributes to the jobseeker's own AI literacy by working through the tool with them.
Reporting of suspected discrimination or other issues (AI Act Arts. 85–86)	Recommended but rarely operationalised.	Every output in AICCA carries a one-click "Report Issue" button (with a flag icon) accessible to both jobseeker and support professional. Categories include "Offensive or discriminatory", "Potentially harmful advice or content", "Factually incorrect or misleading", and others. Reports are logged with the full context of the session (user information, inputs and output), and the user is informed of this before submitting.

4. Where AICCA Goes Beyond the Recommendations

Several features of AICCA's design are not required by the study or by the AI Act, but go further than what the recommendations call for. They are noted here for completeness.

- Side of the market.** AICCA is on the candidate side of the recruitment process. It exists in part to mitigate the very risks the study documents on the employer side: opaque filtering, automated rejection, exclusion of non-standard profiles. Helping jobseekers, including the most vulnerable, present themselves clearly is itself a structural counter-measure to employer-side bias.
- Counteracting self-exclusion.** A significant share of labour-market exclusion happens before any employer ever sees a candidate, through self-exclusion by jobseekers who do not believe an opportunity is open to them or who cannot translate their experience into a recognisable application. AICCA is explicitly designed to reduce this self-exclusion, and in doing so to interrupt the mechanism by which inequalities of gender, age, origin, health, language or literacy are so often reproduced by the candidates themselves.
- Democratising the quality of application materials.** AICCA gives all jobseekers access to the quality of CVs, cover letters and interview preparation that, without such support, tends to be available mainly to the most privileged candidates. This is a substantive contribution to equality of opportunity in access to employment. Independent research confirms the scale of what is at stake: a 2023 experiment by Ghent University (Sterkens et al., *PLoS ONE*, 2023) with 445 real recruiters found that resumes with two spelling errors already receive a 7.3 percentage-point lower chance

of interview invitation; five errors reduce it by 18.5 percentage points — an effect greater than any other variable tested. Recruiters do not interpret these errors as isolated slips: they read them as signals of lower conscientiousness, weaker interpersonal skills and reduced intelligence, with the perceived intelligence penalty alone accounting for roughly 32% of the effect. For candidates with limited command of the local language, this is not an abstract risk but a measured, concrete source of disadvantage. AICCA reduces it.

- **Inclusive features in the output refinement.** Among the one-click refinement options, AICCA allows the user to switch the gender used in the wording of the material (for example, in a cover letter) to neutral, feminine or masculine, and to lower the language complexity of the output toward a level closer to the jobseeker’s own command of the target language while preserving correct grammar and syntax. The latter feature supports authenticity in the event that an interview is obtained, an attribute valued by recruiters as confirmed in the ethical assessment workshop referenced below.
- **Practitioner-led design and external ethical assessment.** AICCA is operated by an organisation with more than ten years of frontline employment-guidance practice and several years as a delivery partner with public employment services. Its design is grounded in daily session work with a wide range of jobseeker profiles. In the same spirit, an ethical assessment workshop on AICCA was carried out by the Kenniscentrum Data & Maatschappij in the context of its use by caseworkers of an OCMW/CPAS, with HR managers active in recruitment, caseworkers and jobseekers among the stakeholders involved.
- **Public documentation by default.** The Privacy Policy is accessible from every screen of the platform; the DPIA Support Package is available to any organisation evaluating AICCA. Both reflect a standing commitment to documentation, independent of any external prompt.

5. References

- Wuidar S., Engels L., Lisein O., Zaroni P., Rondeaux G., Pirsoul T. (2026), *Recrutement et sélection à l’ère de l’IA. Utilisation de l’IA, conscience des risques de biais et recommandations relatives aux risques de discrimination de genre*, Institut pour l’égalité des femmes et des hommes / Liège University (LENTIC, HEC-Liège) / Hasselt University (School voor Sociale Wetenschappen), Brussels, February 2026.
- Regulation (EU) 2024/1689 of the European Parliament and of the Council of 13 June 2024 laying down harmonised rules on artificial intelligence (“AI Act”), in particular Articles 4, 9 to 15, 26, 27, 77, 85 to 86, and Annex III.
- Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data (“GDPR”).
- AICCA Privacy Policy, <https://www.aicca.ai/privacy-policy>
- AICCA DPIA Support Package, Version 1.0, March 2026, available from OrientaEuro on request.

6. Contact

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Annex. Walk-Through of the Study’s Recommendations

Section 4 of the study sets out recommendations at three levels: public authorities (4.1), organisations (4.2, with sub-sections for users and developers of AI systems), and individual recruiters (4.3). The walk-through below addresses each recommendation that is relevant to a platform in AICCA’s category. Recommendations addressed exclusively to public authorities are noted but not commented on, as they fall outside the operator’s scope of action.

For each recommendation the table below states: (i) the recommendation as formulated by the study, (ii) the relevant AI Act or GDPR reference where applicable, and (iii) AICCA’s response.

A. Recommendations to public authorities (study §4.1)

These recommendations are addressed to legislators, regulators and supervisory bodies. They are not within the operator’s direct scope of action, but AICCA is structured to support them where relevant, in particular by being available for voluntary review, by maintaining public-facing documentation, and by being operated by an organisation embedded in the Belgian public-employment-services ecosystem.

Recommendation	Regulatory reference	AICCA response
Examine whether the existing legal framework is sufficient to prevent discrimination by AI in recruitment.	—	Out of scope for the operator. AICCA is available for voluntary review by Belgian equality bodies and supervisory authorities.
Develop documentation and training for users and developers of AI systems.	AI Act Art. 4	AICCA publishes a Privacy Policy and provides a DPIA Support Package. Onboarding of support professionals incorporates the elements of AI literacy training.
Provide sufficient resources to fundamental-rights authorities (AI Act Art. 77).	AI Act Art. 77	Out of scope for the operator. AICCA undertakes to cooperate with any review request from a competent authority.
Invest in AI systems developed in Belgium that detect bias and support non-discriminatory recruitment.	—	AICCA is a Belgian-developed system whose explicit purpose is to support jobseekers, including those most exposed to discrimination, in preparing materials for the labour market.

B. Recommendations to organisations using AI systems (study §4.2.1)

This is the section of the study most directly relevant to AICCA when the platform is operated within an institutional deployment. Each item below identifies how AICCA’s design supports the deploying organisation in meeting the recommendation.

Recommendation	Regulatory reference	AICCA response
Establish an internal AI policy and communicate it clearly to staff.	—	AICCA’s design assumptions, oversight model and data-handling practices are documented in the Privacy Policy and the DPIA Support Package, providing a basis on which the deploying organisation can articulate its own internal policy.
Create an AI ethics committee, ideally led by HR, including staff representatives.	—	A matter for the deploying organisation. AICCA’s documentation supports the work of such a committee by providing a clear account of the system.
Identify AI systems used informally by staff (“shadow AI”) and assess associated risks.	—	AICCA replaces the “shadow AI” pattern in the employment-coaching context: it provides support professionals with a curated, version-controlled platform, removing the need for ad-hoc personal LLM use on beneficiary data.
Involve stakeholders, including staff representatives, when introducing high-risk AI systems, and inform employees of their introduction.	AI Act Art. 26; CCT n°39	AICCA’s documentation is provided to the deploying organisation in advance to support its information and consultation duties.
Continuously evaluate the relevance and performance of AI systems; ask the “question zero”, what is the AI for?	—	AICCA’s stated purpose is narrow and explicit: to support the preparation of jobseekers for the labour market through draft materials reviewed by the user. It is not used for selection, scoring or evaluation of individuals.
Implement monitoring of the AI system and rapid reporting of issues to the provider.	AI Act Art. 26	Every output in AICCA carries a one-click “Report Issue” button accessible to both jobseeker and support professional, with categories including “Offensive or discriminatory” and “Potentially harmful advice or content”. Reports are logged with the full session context to allow investigation and corrective action. OrientaEuro also maintains a direct support channel for deploying organisations.
Conduct regular independent audits to detect and correct algorithmic bias.	—	AICCA is open to external review. Prompt versions, the model used and the full exchange with the LLM are tracked and can be made available for audit purposes under appropriate confidentiality arrangements. An independent ethical assessment workshop has been carried

Recommendation	Regulatory reference	AICCA response
		out by the Kenniscentrum Data & Maatschappij in an OCMW/CPAS deployment context.
Maintain a register and traceability of all steps of the automated recruitment process.	AI Act Arts. 12, 26	Session inputs and generated outputs are retained to allow continuity of guidance and retrospective review. The model used and the full exchange of information with the LLM are tracked, including both the inputs the jobseeker chose to share and the prompting layer designed by OrientaEuro.
Implement systematic human supervision and a culture in which algorithmic outputs may be questioned.	AI Act Art. 14	Human oversight is structural, not procedural. The user controls inputs (no information is loaded automatically; every input may be edited before processing) and outputs (every output is presented as a draft, never as a decision; it may be edited, regenerated or discarded). The user is the source of any decision.
Implement robust data-management procedures in line with the GDPR; designate a DPO or internal lead where possible.	GDPR (full)	Documented in the Privacy Policy and the DPIA Support Package: EU-based hosting, role-based access, contractual safeguards with service providers, lawful bases identified per deployment context.
Use bias-prevention and -neutralisation systems (e.g. automatic checks of gender-neutral language in job descriptions).	—	Not directly applicable in the same form, since AICCA does not generate job postings on the employer side. On the candidate side, prompt design avoids reproducing demographic stereotypes; the user can switch the gender used in the wording of the output to neutral, feminine or masculine with one click; and the user may withhold name, gender or information that would indicate age or origin from the inputs themselves.
Inform candidates (internal and external) of the use of an AI system at the start of the recruitment process, of its role and operation, and of the use and protection of personal data.	AI Act Art. 26	A persistent on-screen notice informs every user that results are generated using AI and should be reviewed and edited, with a link to the Privacy Policy.
Consider conducting a fundamental-rights impact assessment before deployment.	AI Act Art. 27	AICCA provides the DPIA Support Package precisely to facilitate such assessments by deploying organisations.

Recommendation	Regulatory reference	AICCA response
Ensure a sufficient level of AI literacy for staff (AI Act Art. 4) and invest in training on AI and non-discrimination.	AI Act Art. 4	Support professionals, both within OrientaEuro and within external deployments, are onboarded and coached in responsible, human-centred, AI-supported career guidance. This coaching incorporates the elements of AI literacy training proper. In guided use, the support professional in turn contributes to the jobseeker's own AI literacy by working through the tool with them.
Allocate a specific budget from the implementation phase for training, bias-mitigation actions and audits.	—	A matter for the deploying organisation. AICCA's pricing model is structured to include onboarding and ongoing support.

C. Recommendations to organisations developing AI systems (study §4.2.2)

Although AICCA is not a foundation-model provider, it is an AI system in the sense of the AI Act and OrientaEuro is responsible for its design. The recommendations below apply accordingly.

Recommendation	Regulatory reference	AICCA response
Integrate the principle of "Equality by Design" from the conception stage; assess the system's impact on equality and non-discrimination, including by testing algorithms on diversified datasets.	—	AICCA's design intent is to support all jobseeker profiles, with particular attention to those most exposed to discrimination on the employer side. Prompts are designed to translate non-standard career trajectories into legible application materials, rather than to compress them toward a normative profile.
Select suppliers compliant with the AI Act, in particular through CE-marked tools.	AI Act (full)	Technical service providers used by AICCA are selected with attention to AI Act and GDPR compliance, with appropriate contractual safeguards.
Conduct regular post-deployment testing and provide a correction mechanism in case of detected bias.	—	Prompt versions are tracked centrally; issues identified by support professionals or jobseekers can be escalated through the in-product "Report Issue" mechanism and through the direct support channel, and result in updates that propagate to all users.

Recommendation	Regulatory reference	AICCA response
Involve stakeholders throughout the development process.	—	AICCA's design has been shaped by direct, ongoing practice in employment-guidance sessions with a wide range of jobseeker profiles, by feedback from support professionals using the platform daily, and by an external ethical assessment workshop conducted by the Kenniscentrum Data & Maatschappij with caseworkers, jobseekers and HR managers active in recruitment among the stakeholders involved.
Provide clear, accessible technical documentation and training to explain the system's functioning, its limits and how to use it responsibly.	AI Act Arts. 11, 13	OrientaEuro provides the DPIA Support Package, the Privacy Policy and direct onboarding and coaching of support professionals.

D. Recommendations to individual recruiters (study §4.3)

These recommendations are formulated for recruiters using AI in selection. AICCA's users are not recruiters but jobseekers and the support professionals who accompany them; the recommendations are nevertheless instructive and the platform is designed to support equivalent good practice on the candidate side.

Recommendation	Regulatory reference	AICCA response
Formulate queries carefully in search engines and LLMs, using inclusive language in Boolean operators.	—	AICCA users do not formulate raw LLM queries; the platform's centrally curated prompts mediate the interaction with the underlying AI service.
Work on prompt quality to limit bias, e.g. asking the AI explicitly to identify possible biases in the texts it produces.	—	Prompt design is centralised and refined over time. Users are not exposed to the prompt layer and therefore are not at risk of introducing ad-hoc biased prompts.
Develop a critical posture toward AI-generated results: verify, compare, manually adjust analyses.	—	Reinforced at every interaction: every screen of AICCA displays the notice that results are generated using AI and should be reviewed and edited before use.
Maintain dual human supervision for any important decision, in particular the rejection of a candidate.	AI Act Art. 14	Not directly applicable: AICCA does not reject candidates and makes no decisions about individuals. Where the platform is used in guided mode, both the jobseeker

Recommendation	Regulatory reference	AICCA response
		and the support professional are present in the review of outputs.
In addition to organisational measures, inform candidates of the use of AI, the steps concerned and the purposes pursued, from the start of the recruitment process.	AI Act Art. 26	Information is built into the platform interface and into the Privacy Policy, accessible from the footer at all times.
Be able to answer candidates' questions about how the selection process was managed.	AI Act Arts. 85–86	Because outputs are drafts produced for and reviewed by the jobseeker, the user is in the strongest possible position to explain how their materials were produced.
Report any suspicious or discriminatory situation in AI-generated results to the competent authorities (market-surveillance authorities, trade-union representatives, equality bodies).	—	AICCA provides an in-product “Report Issue” mechanism with categories including “Offensive or discriminatory” and “Potentially harmful advice or content”, accessible to both jobseeker and support professional. Reports are logged with the full session context. OrientaEuro encourages onward reporting to competent authorities and undertakes to cooperate with any inquiry.

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