



GPA Global Privacy and Data Protection Awards 2025

Entry Form

To submit an entry to the GPA Global Privacy and Data Protection Awards, please complete and email this form to secretariat@globalprivacyassembly.org **no later than 16 June 2025**.

Note: GPA member authorities can submit as many entries as they wish, but a separate form should be used for each different entry, submitted by the deadline above.

Languages: The GPA documentation Rule 6.2¹ applies.

1. CONTACT DETAILS FOR THIS ENTRY

Privacy/Data Protection Authority:	UK Information Commissioner's Office (ICO)	
Person completing this form:	Liam	Duncan
	<i>First name</i>	<i>Last name</i>
Job title:	Head of Regulatory Assurance	
Email address:	Liam.Duncan@ico.org.uk / gpa@ico.org.uk (please use both email addresses for all correspondence with the ICO)	

2. ELIGIBILITY

By submitting this entry, I confirm that (*please tick all boxes to confirm*):

- ☒ The Authority is a member of the Global Privacy Assembly
- ☒ The initiative described in this entry was undertaken before 16 June 2025.
- ☒ I am aware that the information in the entry (other than the contact details in 1(a) above) will be publicised by the GPA Secretariat.

3. CATEGORIES

Please indicate which category you wish to enter.

*Please tick **one**; please use a separate form for each category you wish to enter:*

- ☒ Education and Public Awareness
- ☐ Accountability
- ☐ Dispute Resolution and Enforcement
- ☐ Innovation
- ☐ People's Choice

¹ [GPA Rules and Procedures](#), Rule 6.2 'Assembly documents':

Without prejudice to section 4.2, Assembly documents, including accreditation and observer applications may be submitted in English or in another language. In the latter case, the documents shall be accompanied by an English version. Members with the ability and the resources to do so are encouraged to translate proposed resolutions and other Assembly documents such as the Assembly Rules and Procedures.

4. DESCRIPTION OF THE INITIATIVE

a. Please provide a brief summary of the initiative (no more than 75 words)

The ICO audited providers and developers of AI tools for the recruitment industry, uncovering considerable areas for improvement, such as ensuring personal information is processed fairly and clearly explaining to candidates how their information is used by the AI tool.

We made almost 300 recommendations to improve compliance with data protection law. Published in November 2024, the Outcomes Report summarises the key findings from the audits and provided practical recommendations for recruiters wishing to use these tools to ensure that they can do so in a compliant manner while protecting the rights of the job applicants.

b. Please provide a full description of the initiative (no more than 350 words)

As part of the ICO's upstream monitoring of the wider AI ecosystem, aiming to understand how the development and provision of AI recruitment tools complies with UK data protection law, between August 2023 to May 2024 the ICO carried out a series of consensual audits and engagements with developers and providers of AI-powered sourcing, screening, and selection tools used in recruitment.

This work covered a range of AI use cases such as machine learning, including natural language processing. Our audits found some considerable areas for improvement in data protection compliance and management of privacy risks in AI. In many instances we found a startling lack of compliance in some tools being used for recruitment, where judgements made by AI were little better than estimation or guesswork. This could lead to job applicants across the country being unfairly discriminated against based upon characteristics such as their race, age or gender. ICO auditors made 296 recommendations and 42 advisory notes across all engagements – 97% of these recommendations were accepted, and actions set.

The ICO published an Outcomes Report which summarised seven key recommendations from the consensual audits, as well as providing examples of good practice, case studies and points to consider for both recruiters and AI developers.

The publication of the Outcomes Report was targeted at both the AI and recruitment industries and set clear expectations on the development and deployment of these tools. Our intervention is already leading to positive changes by the providers of these AI tools. All our recommendations have been actioned by those organisations, and we now fully expect to see other recruiters and AI developers take note of our findings and consider the practical advice in our report to help jobseekers and employers to trust in their tools.

c. Please explain why you think the initiative deserves to be recognised by an award (no more than 200 words)

AI-powered recruitment tools have become a focal point in modern hiring, offering the promise of streamlining processes and improving candidate selection. We recognise that shifting the processing of personal information to these complex and sometimes opaque systems comes with inherent risks to people and their privacy. By having high standards of data protection compliance, organisations developing and using AI in recruitment can innovate and deliver great services, while building trust with the public.

The Outcomes Report provides practical recommendations and case studies that can inform and educate both providers and recruitment teams about the responsible use of AI in their recruitment processes and is the first of its kind from the UK regulator.

The methodology for auditing of AI systems is still in its infancy, this work demonstrates how we are making strides in this area to improve our understanding and drive compliance.

The report provides education to the public in this often opaque world of online job applications.

Our work and the subsequent publication of our findings also led to our delivery of an external webinar attended by over 300 delegates on the subject, the updating of our existing guidance and focussed the direction of the ICO's AI & Biometrics Strategy for 2025/26.

- d. Please include a photograph or image, if you wish** (*This will be published with your entry on the GPA website. The image can be pasted into the box below, be sent as an attachment or a link may be provided*)

- e. Please provide the most relevant link on the authority's website to the initiative, if applicable** (*The website content does not need to be in English*)

[AI tools in recruitment | ICO](#)

- f. Please provide any other relevant links that help explain the initiative or its impact or success** (*e.g. links to news reports or articles*):

External webinar based on the report: [ICO Webinar AI tools in recruitment.- 20250122_105945-Meeting Recording on Vimeo](#)