

## Use of AI-Based Tools in Recruitment and Selection Policy

### 1.0 Purpose

This Policy outlines the Vector Institute (“Vector”)’s commitment to the responsible, transparent, and ethical use of Artificial Intelligence (“AI”) based tools for recruitment and selection. AI-based tools are intended to support, not replace, human judgement ensuring efficiency and consistency in reviewing applications while upholding fairness, protecting candidate privacy, and maintaining compliance with applicable laws, including but not limited to *Ontario’s Working for Workers Act, 2024* (“Bill 149”), the Ontario Human Rights Code, and the *Personal Information Protection and Electronic Document Act* (“PIPEDA”), and *Quebec’s Act*, respecting the protection of personal information in the private sector (“Law 25”).

In addition, all AI-based tools used by the Vector Institute must adhere to [Vector’s AI Trust and Safety Principles](#) above and in addition to applicable legislation.

The Policy establishes clear standards for responsible use, human oversight, and transparency in all recruitment and selection activities where AI-based tools are applied.

### 1.1 Regulatory Context

This Policy is established to ensure Vector’s use for AI-based tools complies with the applicable Canadian federal and provincial legislation, including *Bill 149, the Ontario Human Rights Code, PIPEDA, and Law 25*. These regulations collectively govern the collection, transparency, and cross-border transfer of candidate personal information.

### 2.0 Scope

This Policy applies to the use of AI-based tools within the recruitment and selection process, including resume screening, automated assessments, ranking algorithms, and other AI-supported candidate evaluation tools, for both internal and external hiring processes.

### 3.0 Data Privacy and Security

Candidate personal information is collected, used, and retained solely for recruitment purposes, in accordance with applicable laws and this Policy, [Vector’s External Privacy Policy](#).

Access to candidate data is limited to authorized HR personnel, hiring managers, and interview panels. AI-based tools are configured to prevent the collection or inference of sensitive personal attributes unrelated to job requirements.

Third-party vendors must comply with contractual and legal requirements for privacy and confidentiality and are evaluated to ensure compliance with Vector's data protection, security standards.

### **3.1 Cross-Border Data Transfer**

Third-party vendors must provide detailed disclosure of all jurisdictions where candidate data will be processed and implement appropriate safeguards when processing occurs in jurisdictions with weaker privacy protections.

Vector reserves the right to object to the appointment or continued use of any third-party vendor if Vector determines, in its reasonable discretion, that the vendor's cross-border data transfer policies or practices are unsatisfactory or inconsistent with Vector's compliance obligations.

In the case of cross-border transfers, vendors require explicit certification of compliance with Canadian privacy laws.

### **3.2 Sub-Processor Management**

Vector reserves the right to object to any sub-processor that does not comply with Vector's data protection standards.

Vector will proactively request that third-party vendors identify current subcontractors and proposed future subcontractors.

### **3.3 Data Minimization and Anonymization**

Vector may exercise its written opt-out right to prohibit third-party vendors from creating anonymous or aggregate datasets from candidate information.

### **4.0 Fairness and Non-Discrimination**

AI-assisted recruitment processes must remain equitable, accessible, and free from discrimination, in alignment with Vector's [Diversity and Inclusion Policy](#).

All outputs generated by AI-based tools in the recruitment and selection process are periodically reviewed by Vector to detect and mitigate potential bias or barriers to fairness. Any anomalies or concerns regarding fairness, discrimination, or barriers are to be documented and escalated to Vector's Human Resources department for review and corrective action with the third-party vendors.

### **5.0 Transparency and Accommodation**

Candidates are informed whenever AI is used to assist in screening and selection. Job postings and communications with candidates clearly disclose the use of AI involvement.

Candidates who require accessibility accommodations or wish to opt out of AI-based assessments may request alternative arrangements to ensure equitable access to participation in the recruitment process.

Employees involved in recruitment receive guidance and onboarding on the AI-based tools in use, their business purpose, and how such tools can influence recruitment practices.

## **6.0 Responsible Use**

Vector uses AI-based tools to enhance the efficiency and consistency of the recruitment process through automated interviewing and data analysis. While these tools provide valuable insights, their output—including transcripts, analysis, and candidate summaries—are intended to augment, rather than replace, human judgement.

### **6.1 Vendor Accountability**

Third-party vendors must provide real-time access to processing logs and decision audit trails. While vendors should provide Canadian residency options, any cross-border processing requires detailed jurisdictional disclosure and explicit certification of compliance with Canadian privacy laws.

Vector reserves the right to object to, or terminate, any vendor relationship if cross-border transfer policies are deemed unsatisfactory or inconsistent with Vector's compliance obligations.

Service agreements must include immediate termination rights in the event of privacy or security breaches.

### **6.2 Advisory nature of AI Outputs**

AI-generated outputs are provided as advisory tools. All final candidate evaluations must involve a human review to verify the accuracy of the AI's interpretation and ensure the context of candidates' responses are fully understood.

### **6.3 Model Training and Data Privacy**

In accordance with Vector's vendor agreements, candidate responses and usage data shall not be used by third-party vendors to train or improve their generalized machine-learning models if Vector has exercised its written opt-out right.

## **7.0 Governance and Human Oversight**

Vector's Human Resources department maintains oversight of the AI-based tools used in recruitment, ensuring adherence with corporate policies, relevant employment standards, and data privacy requirements.

All AI-based tool outputs are advisory; final hiring decisions remain the responsibility of Vector's Human Resources personnel, hiring managers, and interview panels.

Candidate inquiries, complaints, appeals, or anomalies are recorded and addressed promptly. All AI-assisted decisions are auditable for compliance purposes.

## 7.1 Continuous Monitoring

Vector's Human Resources department will have the opportunity to conduct periodic compliance reviews of all active AI-based recruitment tools. These reviews are designed to ensure third-party processing remains consistent with Vector's standards and shall include:

**Jurisdictional Audit:** Verification of all current jurisdictions where candidate data is processed or stored. Any changes in data residency or the addition of new internal sub-processors must be disclosed by the vendor.

**Log Access:** Validation that the vendor is able to provide Vector with timely access to processing logs and decision audit trails for transparency and bias-testing purposes.

**Compliance Recertification:** A review of the vendor's updated privacy policies or security certifications to ensure no new 'unsatisfactory' cross-border transfer practices have been introduced that could trigger Vector's right to object or opt out.

## 7.2 Vendor Management

Vector's Human Resources, in partnership with Vector's Business Computing, will conduct annual security assessments, which include certification and compliance documents of all third-party vendors, with the right to conduct additional audits upon reasonable notice.

Third-party vendors must provide timely access to processing logs and decision audit trails. Vendors should prioritize Canadian data residency (*where possible*); where cross-border transfers occur, they must comply with the requirements set out in Section 3.1.

## 8.0 Training

Vector's Human Resources personnel, hiring managers and interview panels involved in recruitment receive training on the responsible use of AI-based tools, including privacy, fairness, bias awareness and human oversight.

Onboarding for AI-based tools is provided by the vendor to ensure consistent understanding of AI capabilities, limitations, and ethical obligations.

## 9.0 Amendment

The Vector Institute reserves the right to amend, replace or revoke this Policy as necessary to remain current with evolving regulations, technologies, and organizational standards.

This Policy is reviewed at least annually to ensure continued relevance and effectiveness.