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AI in the Workplace: Challenges, Opportunities and Applicable Framework

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Introduction: The growing role of AI at work

Artificial Intelligence (AI) is rapidly transforming the workplace by automating tasks and procedures once reserved for humans, thus increasing productivity. For employers, the challenge lies in harnessing AI's efficiency without losing sight of fairness, transparency, and the human impact at the heart of the workplace. Greece is already equipped with a framework of both European and national laws, poised to deal with the challenges that AI brings to the workplace.

AI Act in general

- ✓ **Human-centric AI:** EU Regulation 2024/1689 (AI Act) arrived as a landmark regulatory framework, aiming to combine innovation with legal and ethical safeguards and promote the use of AI as a tool for human prosperity.
- ✓ **Risk-based approach**: Instead of imposing blanket rules that could harm innovation and competitiveness, the AI Act regulates AI systems according to the risks they pose to fundamental rights, health, and safety. Classification depends not on the underlying technology but on its intended use.
- ✓ **Four risk categories**: In this context, some AI practices are prohibited, others are deemed high-risk and are subject to strict obligations and some are considered of limited risk, accompanied only by transparency requirements. A separate regime applies to general-purpose AI systems, including Large Language Models.

Prohibited practices in the employment context

Certain AI practices are prohibited because they entail an unacceptable risk, mainly due to their potentially manipulative and exploitative nature. In the employment context, the AI Act prohibits the operation of AI systems used to determine the emotional state of individuals, except where an AI system is intended to be put in place or into the market for medical or safety reasons.

The rules on prohibited practices already apply from February 2, 2025.

High-risk AI systems: obligations of employers as deployers

Notion of high-risk AI systems

Certain AI systems are not prohibited but their operation is subject to certain rigid obligations. Such systems include those intended for hiring/selection purposes, evaluating workers' behavior and performance, or those used to determine employees' tasks as well as potential promotion or termination of their contracts.

Exceptions

AI systems used in the workplace **are not classified as high-risk** if they are used only for narrow procedural tasks, to support or improve a human decision, to detect patterns, or to prepare an assessment. The exception applies provided that such systems are not used for profiling. For a system not to be classified as high-risk, its provider must have recorded this

assessment in writing before putting it on the market and comply with registration requirements.

Steps for employers' compliance

- ✓ **Follow instructions:** Deployers must use high-risk AI systems according to the provider's guidance, fully understanding the system's purpose and limitations.
- ✓ **Ensure human oversight:** Qualified personnel should supervise the system and be able to intervene to prevent fully automated decisions.
- ✓ **Monitor and manage risks:** Deployers need to continuously track system performance and report risks to health, safety, or fundamental rights to the provider and authorities, suspending operations if necessary.
- ✓ **Maintain data quality:** Where deployers control input data, the data should be relevant and representative of the intended purpose.
- ✓ **Document and report:** Deployers must keep logs for at least six months and cooperate with authorities to demonstrate compliance, when requested.
- ✓ **Ensure transparency:** Before putting into service or using an AI system in the workplace, employers must inform workers and their representatives that they will be subject to the use a high-risk AI system.

The provisions concerning high-risk AI systems will start applying from August 2, 2026.

Additional transparency obligations for employers under Law 4961/2022

Before the enactment of the AI Act, Greece had already adopted Law 4961/2022, which supplements the provisions of the AI Act. Depending on the size of their business, this Law requires employers of the private sector, to:

- ✓ **Notify affected individuals:** The employer, before first using an AI system that influences employment-related decisions, must inform current and prospective employees. The information must at least include the parameters guiding the AI's decision-making.
- ✓ **Maintain an electronic record:** The employer must create a record of AI systems used for the assessment of employees or other contractors. The record must include at least a description of the system's functions and technical specifications, the number and roles of individuals concerned, the developers or suppliers of the system, the period of operation, and the security measures applied.
- ✓ **Implement a data ethics policy:** The policy illustrates the actions taken to address data ethics issues emerging from the use of AI systems for assessments in the workplace.

Final remarks

As AI technologies are transforming the workplace, the EU AI Act, alongside Greek Law 4961/2022, introduces a clear, risk-based framework to ensure protection of fundamental values prohibited AI uses are banned, high-risk systems are subject to strict oversight, and transparency obligations have been implemented to safeguard employees. Responsible deployment, continuous monitoring, data quality, and human supervision are essential to balance innovation, fairness, and compliance.

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