

NEW GUIDELINES FOR THE USE OF ARTIFICIAL INTELLIGENCE IN THE WORKPLACE



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Decree No. 180 of 17 December 2025 issued by the Ministry of Labour has published the new Guidelines for the implementation of artificial intelligence in the workplace, which serve as an operational reference for all businesses that use or intend to use AI systems in their business processes.

Below we highlight the main areas of focus for businesses.

1. Governance and preliminary assessment of AI systems

Companies are required to carry out a preliminary assessment of the impact of AI on business processes, verifying in particular:

- the purpose and methods of use of AI systems;
- the impact on workers and on corporate decision-making processes;
- the quality and methods of data use;
- risks of algorithmic discrimination or bias.

The Guidelines also recommend the adoption of governance models and internal policies dedicated to AI, with a clear identification of responsibilities and control mechanisms.

How we can support businesses

- AI legal risk assessment and mapping of AI systems used within the company;
- preparation of AI governance frameworks and company policies on the use of AI;
- verification of compliance with the AI Act and applicable regulations.



2. Transparency towards employees and human oversight

The Guidelines emphasise that AI systems must not replace human judgement in decision-making processes affecting employees (e.g. recruitment, performance appraisal or work organisation).

Companies must therefore ensure:

- transparency regarding the use of algorithms in business processes;
- traceability of automated decisions;
- effective human oversight in decision-making processes.

How we can support companies

- review of HR processes that use AI tools;
- provision of information to workers on the use of algorithmic systems;
- support in managing relations with trade union representatives and in collective bargaining.
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3. Protection of personal data and compliance with the GDPR

The use of AI systems in the workplace inevitably involves the processing of personal data of employees or candidates, with particular attention to:

- the principles of lawfulness, data minimisation and proportionality of processing;
- the prohibition of fully automated decisions without adequate safeguards;
- data security and restriction of access to sensitive information.

The Guidelines also recommend avoiding the inclusion of personal data, strategic information or corporate know-how in AI systems in the absence of adequate technical and contractual safeguards.

How we can support businesses

- data protection impact assessment (DPIA) for AI systems;
- review of privacy notices and the legal bases for processing;
- negotiation and review of contracts with AI technology providers.



4. Risk management and periodic audits of AI systems

Companies are encouraged to implement systems for the continuous monitoring of AI systems, with periodic checks designed to identify:

- algorithmic errors or discriminatory biases;
- impacts on the organisation or on workers' well-being;
- any risks of excessive or inappropriate surveillance.

Suggested tools include ethical and organisational audits, risk mapping systems and dedicated reporting channels.

How we can support businesses

- legal and organisational audits on the use of AI;
- implementation of reporting and risk management procedures;
- assessment of stress-related risks arising from the use of AI systems (as required by Law 81 on workplace safety).

5. Training for workers and managing the digital transition

The Guidelines place particular emphasis on training and reskilling for workers.

Public funding schemes for training are also available, including the New Skills Fund and inter-professional funds, about which we have already sent you a newsletter and which could cover up to 100% of the costs.

How we can support businesses:

- support in designing AI training and compliance programmes;
- assistance in accessing incentives and public funding schemes.

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