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Operationalising Responsible AI in Indian Human Resource Management: A Documentary Analysis of AI Governance and Data Protection

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ABSTRACT :

The growing use of artificial intelligence (AI) in human resource management (HRM) has created opportunities to improve recruitment, employee development, performance assessment and workforce planning. However, AI-assisted HR practices also raise concerns regarding algorithmic bias, personal data protection, transparency, accountability and the preservation of meaningful human judgement. Although recent research has examined responsible AI in HRM, organisations require context-specific guidance for translating broad governance principles and applicable legal requirements into practical HR procedures. This paper examines the relevance of India's AI Governance Guidelines, 2025, and the Digital Personal Data Protection Act, 2023, together with the Digital Personal Data Protection Rules, 2025, to AI-assisted HR practices. It adopts a qualitative documentary analysis of official policy and legal materials, supported by selected academic literature on responsible AI, algorithmic hiring and HR governance. The analysis develops a function-specific implementation matrix covering recruitment and selection, learning and development, performance management, workforce planning, and employee monitoring. It distinguishes legal requirements from non-binding policy guidance and additional organisational safeguards proposed by the author. The analysis indicates that responsible implementation requires more than the adoption of general ethical principles. Organisations need documented accountability, appropriate data practices, review of algorithmic outputs, human oversight and continuing evaluation of system performance. The paper contributes an India-focused implementation structure for connecting AI governance and data protection with HR processes. The proposed structure is analytical and has not been empirically validated. Its application should account for the phased commencement of the Digital Personal Data Protection framework and other laws applicable to employment decisions.

Keywords: Artificial intelligence, human resource management, responsible AI, AI governance, data protection, India, HR analytics, algorithmic accountability

1. Introduction

Artificial intelligence is increasingly being incorporated into organisational activities, including human resource management. AI-enabled applications can assist organisations in screening applications, matching candidates with vacancies, recommending learning programmes, analysing workforce data, supporting performance assessment and forecasting staffing requirements. These applications may improve processing speed, support consistency and help HR professionals manage large volumes of information. However, their usefulness depends on the quality of the data, the suitability of the models and the manner in which their outputs influence employment-related decisions.

The use of AI in HRM presents distinctive challenges because decisions concerning recruitment, promotion, performance evaluation and employee monitoring can affect individuals' livelihoods, professional opportunities and workplace experiences. An algorithm may reproduce patterns of historical discrimination, rely on unsuitable indicators of performance or produce recommendations that are difficult for employees and managers to understand. AI systems may also process personal information in ways that raise concerns about purpose, access, retention and security. These concerns become more significant when organisations treat automated outputs as objective or allow recommendations to influence decisions without adequate review.

Existing scholarship has examined responsible AI in HRM and the risks associated with algorithmic decision-making. Bujold et al. (2024) reviewed empirical research on responsible AI in HRM, while Fabris et al. (2025) examined fairness and bias across the algorithmic hiring process. Naoum et al. (2026) analysed the dual implications of AI for diversity, equity and inclusion. These studies establish the importance of examining not only the potential benefits of AI but also the conditions under which its use may be considered responsible.

The Indian policy and legal context adds a further dimension to this discussion. The Ministry of Electronics and Information Technology issued the India AI Governance Guidelines in 2025, setting out principles and recommendations intended to support safe, trusted and responsible AI adoption across

sectors. The Digital Personal Data Protection Act, 2023, and the Digital Personal Data Protection Rules, 2025, provide a separate legal framework for digital personal data processing, subject to their respective commencement provisions and applicable exceptions. The AI Governance Guidelines and the data-protection framework perform different functions. The former provides governance guidance, whereas the Act and Rules establish legal requirements as and when the relevant provisions become operative.

The existence of these frameworks does not automatically explain how an organisation should govern AI-assisted HR activities. HR managers need to identify the risks associated with individual functions, determine which legal provisions apply, assign responsibilities and establish appropriate procedures for reviewing system outputs. It is also necessary to distinguish legal obligations from recommended organisational practices so that guidance is not incorrectly presented as a statutory requirement.

Against this background, the present paper examines how Indian AI governance principles and data-protection provisions can inform responsible AI implementation in HRM. Rather than proposing another general ethical framework, it develops a documentary analysis and a function-specific implementation matrix that connects governance considerations with practical HR controls.

2. Review of Literature

2.1 Artificial Intelligence in Human Resource Management

AI can support several stages of the employee lifecycle. Recruitment systems may classify applications, identify potential candidates and assist with job matching. Learning platforms may recommend training content based on an employee's skills or learning requirements. Performance management systems may analyse selected indicators to support managerial assessment, while workforce analytics may assist with staffing forecasts and skill-gap identification.

However, the use of AI does not necessarily improve the quality of HR decisions. The usefulness of an output depends on whether the underlying data and evaluation criteria are appropriate for the intended decision. A system trained on historical recruitment outcomes, for example, may reproduce past preferences rather than identify the most suitable candidates. Similarly, a performance model may give excessive weight to easily measured indicators while overlooking teamwork, contextual constraints or other relevant aspects of work.

Bujold et al. (2024) reviewed empirical research on responsible AI in HRM and highlighted the need to understand the risks and limitations associated with AI use in organisational settings. Their work supports an approach that examines actual practices and outcomes rather than assuming that technological adoption automatically produces better decisions.

2.2 Fairness, Bias and Algorithmic Hiring

Recruitment is one of the most visible applications of AI in HRM. Automated systems may support job advertising, application screening, candidate ranking and interview assessment. These applications can improve processing efficiency, but they may also influence who receives employment opportunities.

Fabris et al. (2025) provide a multidisciplinary analysis of fairness and bias in algorithmic hiring. Their review demonstrates that bias may arise at different stages of the hiring process and that evaluating an algorithm in isolation may be insufficient. Data selection, job requirements, model design, evaluation measures and organisational practices can all influence outcomes.

Consequently, responsible hiring requires attention to the complete recruitment process. Organisations should examine whether the criteria used by an AI system are relevant to the job, whether the system produces materially different outcomes across relevant groups and whether a qualified person can review questionable recommendations. These controls are proposed implementation measures in the present paper, not a claim that every such measure is expressly required by the Indian AI Governance Guidelines or the DPDP Act.

2.3 Responsible AI and Organisational Accountability

Responsible AI concerns the manner in which AI systems are selected, developed, deployed and monitored. In HRM, responsibility cannot be assigned exclusively to a software provider because organisational decisions about the purpose, configuration and use of a system also influence its effects.

Bujold et al. (2024) identify responsible AI in HRM as a subject requiring further empirical attention. The National Institute of Standards and Technology's AI Risk Management Framework similarly offers a structured approach to managing AI risks through governance, contextual understanding, measurement and risk management (National Institute of Standards and Technology [NIST], 2023).

For HR departments, these perspectives suggest the importance of documenting the purpose of an AI application, identifying possible harms, assigning responsibility for reviewing outputs and monitoring system performance. They also support the need to retain meaningful human judgement in decisions that significantly affect employees or applicants.

2.4 Diversity, Equity and Inclusion

AI may support more consistent decision-making, but consistency should not be confused with fairness. If the data or criteria used by a system reflect historical inequalities, automation may reproduce or reinforce those patterns.

Naoum et al. (2026) examined the dual impact of AI on diversity, equity and inclusion in HRM. Their review identifies both the potential for AI to support standardisation and accessibility and the risk that algorithmic systems may perpetuate bias. This indicates that fairness should be evaluated in the organisational context in which a system is used.

A practical approach should therefore include appropriate evaluation of selection criteria, review of outcomes and consideration of whether a system disadvantages individual for reasons unrelated to job requirements. Organisations should also be cautious about relying on a single numerical fairness measure as conclusive evidence that a system is suitable.

2.5 The Indian AI Governance and Data-Protection Context

The India AI Governance Guidelines, 2025, articulate seven principles: trust, people first, innovation over restraint, fairness and equity, accountability, understandable by design, and safety, resilience and sustainability (Ministry of Electronics and Information Technology [MeitY], 2025). These principles provide a policy foundation for considering the effects of AI on people, the need for accountability and the importance of understandable and safe systems.

The Digital Personal Data Protection Act, 2023, establishes a framework for the processing of digital personal data. The Digital Personal Data Protection Rules, 2025, provide further detail on the framework. Their commencement is phased, and the Act's provisions do not all become operative on the same date. Therefore, any assessment of current legal obligations must identify the relevant provision, its commencement date and any applicable exceptions.

The relationship between the Act and HR practices also requires careful interpretation. The Act includes provisions concerning certain legitimate uses, including employment-related purposes, but this does not mean that every form of employee-data processing is automatically permitted. The applicability of a particular provision depends on the circumstances, the purpose of processing and the legal requirements operative at the relevant time. Other applicable laws and contractual obligations may also be relevant.

2.6 Recent Conceptual Work on Responsible AI in HRM

Recent work has already proposed broader frameworks for responsible AI in HRM. For example, Aruchamy (2026) discusses AI's opportunities and challenges in HRM and proposes a framework involving strategic alignment, data governance, fairness, transparency, human oversight, capability development and continuous monitoring. This overlap means that a further general framework based on similar principles would offer limited differentiation.

The present paper therefore takes a narrower approach. It examines the relationship between Indian AI governance guidance, the phased data-protection framework and specific HR functions. Its proposed contribution is the explicit separation of legal requirements, policy guidance and additional organisational safeguards within a function-specific implementation matrix. This is a practical analytical contribution rather than a claim that responsible AI in HRM has not previously been studied.

3. Research Gap, Objectives and Research Questions

3.1 Research Gap

Existing literature examines responsible AI in HRM, algorithmic hiring, fairness, diversity, data-related risks and organisational accountability. Indian AI governance and data-protection instruments provide additional material for assessing how these concerns should be addressed in the Indian context. However, general ethical principles do not by themselves specify how HR departments should translate governance considerations into procedures for individual functions.

The practical issue addressed by this paper is the need to connect AI governance principles and relevant data-protection provisions with HR-specific risks, organisational responsibilities and monitoring measures. The analysis also distinguishes binding legal requirements from non-binding guidance and author-proposed controls. The paper does not claim that this relationship has never been examined elsewhere; its contribution is the particular documentary mapping developed for the Indian context.

3.2 Objectives

The objectives of the study are:

1. To examine the relevance of India's AI Governance Guidelines, 2025, to AI-assisted human resource management.
2. To analyse the relationship between the Digital Personal Data Protection Act, 2023, the Digital Personal Data Protection Rules, 2025, and the processing of personal data in AI-assisted HR practices.
3. To identify key governance concerns across recruitment and selection, learning and development, performance management, workforce planning and employee monitoring.
4. To develop a practical implementation matrix connecting HR functions, potential risks, governance considerations and proposed organisational safeguards.
5. To distinguish applicable legal requirements from policy guidance and additional organisational recommendations.

3.3 Research Questions

RQ1: How can India's AI Governance Guidelines, 2025, inform the governance of AI-assisted HR practices?

RQ2: What data-protection considerations arise when AI systems process personal data in HR functions, taking account of the phased commencement of the Indian data-protection framework?

RQ3: What organisational safeguards can help connect governance principles and applicable legal requirements with the practical risks associated with individual HR functions?

4. Research Methodology

4.1 Research Design

The study adopts a qualitative documentary analysis supported by selected academic literature. Documentary analysis is appropriate because the research questions concern the interpretation and practical application of official policy and legal documents rather than the measurement of employee attitudes or organisational outcomes.

The study does not use surveys, interviews, experiments or primary organisational data. It does not claim to estimate the prevalence of AI adoption or establish the effectiveness of specific safeguards. Its purpose is to interpret selected documents and develop an analytical structure for practical implementation.

4.2 Sources of Information

The documentary analysis focuses on the following categories of material:

1. *Official policy material:* India AI Governance Guidelines, 2025, issued by MeitY.
2. *Primary legal material:* Digital Personal Data Protection Act, 2023; Digital Personal Data Protection Rules, 2025; the relevant commencement notification; and the Rules' corrigendum.
3. *Academic literature:* Selected peer-reviewed research on responsible AI in HRM, algorithmic hiring, fairness, diversity, equity and inclusion, and AI risk management.
4. *Related conceptual research:* Recent work addressing responsible AI implementation in HRM, used to identify areas of overlap and clarify the scope of the present paper.

Official legal texts and notifications are treated as the primary sources for interpreting statutory provisions and commencement dates. Academic articles support the discussion of algorithmic risks and organisational safeguards. A secondary source is not treated as a substitute for the official legal text where the wording or commencement of a provision matters.

4.3 Analytical Procedure

The documents are examined using a thematic approach. Relevant material is organised under five analytical categories:

- AI governance principles and accountability.
- Personal data processing and applicable legal requirements.
- Risks associated with individual HR functions.
- Organisational responsibilities and proposed safeguards.
- Monitoring, review and documentation.

The analysis then maps these categories to recruitment and selection, learning and development, performance management, workforce planning and employee monitoring. The resulting matrix is a structured interpretation of the selected material. It is not a statistical analysis, an empirical validation of controls or a claim that every listed safeguard is explicitly required by law.

4.4 Scope and Legal Interpretation

The legal discussion distinguishes the text of the Act and Rules from their operative status. The Digital Personal Data Protection Act, 2023, and the Digital Personal Data Protection Rules, 2025, provide for phased commencement. The paper therefore does not treat all substantive provisions as already operative merely because the Act and Rules have been published.

The analysis is also limited to AI governance and data protection as they relate to HRM. It does not provide a comprehensive assessment of all Indian employment, equality, industrial relations, information technology or contractual laws that may apply to a particular organisation.

4.5 Methodological Limitations

The study is a qualitative documentary analysis and does not involve primary data. It cannot establish how widely the proposed safeguards are used by Indian organisations or whether they improve recruitment fairness, employee trust or decision quality. The selected literature supports the conceptual discussion but is not presented as the result of an exhaustive systematic review. The proposed implementation matrix should therefore be regarded as an analytical framework requiring further assessment and validation.

5. Documentary Analysis and Findings

5.1 AI Governance as an Organisational Responsibility

The India AI Governance Guidelines, 2025, provide a cross-sector policy foundation for responsible AI. Their principles of trust, people first, fairness and equity, accountability, understandability, and safety and resilience are relevant to employment-related applications because AI-supported HR decisions can affect individuals directly.

For HR departments, these principles can be translated into practical questions. Is the system being used for a clearly defined purpose? Are the criteria relevant to the HR decision? Can the organisation explain the system's role in the decision? Who is responsible for checking its output? What procedure is available when the output appears incorrect or inappropriate?

The Guidelines should not be interpreted as a stand-alone HR statute that automatically imposes every possible control. The organisational safeguards proposed in this paper are practical ways of applying governance principles, rather than claims that each safeguard is expressly mandated by the Guidelines.

5.2 Data Protection and AI-Assisted HR

AI-assisted HR systems may process application details, employment histories, training records, performance information, workforce data and monitoring information. The data-protection implications depend on the type of data, the purpose of processing, the circumstances of collection and the applicable legal framework.

The Digital Personal Data Protection Act, 2023, and the Rules, 2025, need to be interpreted alongside their commencement provisions. As of 29 October 2026, the main group of substantive provisions scheduled to commence eighteen months after the notification of 13 November 2025 is not yet operative. The provisions scheduled for commencement one year after that notification are also not yet operative on the date of this assessment. A submission made after these dates should recheck the operative legal position.

The framework includes provisions concerning certain legitimate uses, including employment-related purposes. Such provisions should not be read as blanket permission to collect or analyse any information for any HR purpose. An organisation should identify the relevant legal basis and applicable conditions rather than assume that the employment relationship resolves every data-protection issue.

For practical governance, organisations should document the purpose of an AI application, identify the data it uses, restrict access appropriately, assess whether the information is suitable for the intended purpose and establish arrangements for reviewing errors or inappropriate use. These are proposed organisational safeguards; the precise statutory duties depend on the provisions in force and the circumstances of the processing.

5.3 Recruitment and Selection

AI systems may help process applications, classify candidate profiles and rank applicants against specified criteria. The principal governance concern is that a system may rely on unsuitable proxies, reproduce historical patterns or disadvantage candidates whose backgrounds differ from the data used to develop it.

The literature on algorithmic hiring indicates that fairness risks can arise throughout the recruitment pipeline rather than only within the model itself (Fabris et al., 2025). An organisation should therefore review the criteria used by the system, examine whether they relate to the job and assess whether the system's outputs remain appropriate in practice.

A practical implementation approach would include documented selection criteria, appropriate testing, human review of consequential recommendations and a procedure for correcting material errors. These controls can help managers use AI as a decision-support tool instead of treating a ranking as a final determination.

5.4 Learning and Development

AI-enabled learning platforms can recommend training material, identify possible skill gaps and support personalised learning. Their usefulness depends on the quality and relevance of the employee information and the criteria used to generate recommendations.

A recommendation may be unsuitable if it is based on incomplete records or outdated assumptions about an employee's capabilities. If learning analytics are later used in promotion or performance decisions, the consequences may extend beyond training.

Organisations should define the purpose of learning analytics, review the suitability of recommendations and provide employees or managers with an appropriate opportunity to correct inaccurate information. Where learning-system outputs influence consequential HR decisions, their limitations should be made clear to the decision-makers.

5.5 Performance Management

AI-assisted performance systems may analyse work-related indicators, summarise records or support performance reviews. However, measurable activity is not necessarily equivalent to the quality or value of an employee's contribution. A system may overlook teamwork, task complexity, external constraints and differences in work responsibilities.

The risk is not simply that an algorithm may make a technical error. It is also that managers may give excessive weight to a numerical output because it appears objective. A responsible approach should identify the intended use of the system, examine whether its indicators are suitable and retain appropriate managerial judgement.

The proposed safeguards include clear evaluation criteria, documentation of the system's role, review of questionable results and a process for correcting inaccurate information. These measures are intended to support fair and context-sensitive decisions.

5.6 Workforce Planning

AI-supported workforce planning may help organisations forecast staffing requirements, identify possible skill gaps and compare alternative workforce scenarios. These applications can support planning, but forecasts remain dependent on the quality of the data and the assumptions used.

A forecast should not be treated as a certain prediction. If data are incomplete or organisational conditions change, recommendations may become unreliable. Managers should therefore understand the assumptions behind a forecast and assess whether it remains appropriate before making consequential staffing decisions.

Proposed safeguards include data-quality checks, documentation of assumptions, access controls and periodic management review. These measures support accountable use without assuming that every forecast requires the same level of control.

5.7 Employee Monitoring

AI-assisted monitoring may analyse activity records or other workplace information to support security, workflow management or operational assessment. Such systems can raise concerns about the amount of information collected, the purpose of monitoring and the risk of interpreting activity measures without sufficient context.

A monitoring system may produce misleading conclusions if its indicators do not accurately represent the work being performed. Excessive or poorly explained monitoring may also weaken employee trust.

Organisations should define the purpose and scope of monitoring, assess whether the information collected is appropriate, restrict access and review the use of outputs. The applicable legal requirements must be determined from the circumstances and the provisions in force. The recommendations in this section are proposed governance measures, not a claim that the DPDP framework establishes a specific AI-monitoring rule for every workplace situation.

6. Proposed HR Implementation Matrix

The following matrix synthesises the documentary analysis. It is a proposed organisational tool, not an empirical finding or a statement that each control is expressly required by legislation.

HR function	Principal risk	Relevant governance consideration	Proposed organisational safeguard
Recruitment and selection	Biased screening, unsuitable ranking criteria or inaccurate candidate assessment	Fairness, equity, accountability and understandable decision-making	Document job-related criteria, test outcomes where appropriate, review consequential recommendations and provide a correction process
Learning and development	Inaccurate skill profiles or unsuitable training recommendations	People first, trust and accountability	Review recommendation quality, correct inaccurate records and clarify how learning analytics may be used
Performance management	Overreliance on numerical scores or incomplete indicators	Fairness, accountability and human judgement	Document evaluation criteria, examine questionable outputs and retain meaningful managerial review
Workforce planning	Misleading forecasts or decisions based on incomplete data	Safety, accountability and appropriate use of information	Check data quality, document assumptions and review forecasts before consequential decisions
Employee	Excessive data collection, weak	Trust, people first,	Define monitoring purposes, assess data needs,

monitoring	contextual interpretation or inappropriate access	accountability and data protection	restrict access and review how outputs are used

Source: Author's proposed synthesis based on MeitY (2025), the Digital Personal Data Protection Act, 2023, the Digital Personal Data Protection Rules, 2025, and selected literature on responsible AI and algorithmic decision-making. The table does not replace a provision-by-provision legal assessment.

6.1 Suggested Organisational Responsibilities

The matrix can be implemented through a shared governance arrangement rather than leaving all responsibility with the HR department.

HR department: Define the business purpose, identify the employment decision being supported, establish relevant evaluation criteria and ensure that managers understand the limitations of AI outputs.

IT and system owners: Maintain appropriate technical access controls, document system changes, support data-quality checks and establish a process for reporting technical errors.

Legal or compliance function: Review applicable legal requirements, determine which provisions are operative and advise on the lawful handling of personal data and other relevant employment obligations.

Senior management: Approve the use of AI for consequential HR activities, assign responsibility and review significant risks.

Line managers: Exercise appropriate judgement, question unsuitable recommendations and ensure that decisions are not based solely on automated outputs where further review is warranted.

These roles are proposed organisational arrangements. Their suitability will depend on the size, resources and structure of the organisation.

6.2 Monitoring and Documentation

Organisations should maintain documentation proportionate to the importance of the HR decision and the risks associated with the AI application. Useful records may include the purpose of the system, the data categories involved, the decision supported, the person responsible for oversight, known limitations, review procedures and material incidents.

Monitoring should be proportionate to the system's use. A tool that recommends optional training may not require the same controls as a system that ranks candidates or influences performance decisions. The aim is to establish sufficient oversight to identify errors, unsuitable outputs and unintended effects without treating all AI applications as identical.

7. Discussion

The documentary analysis suggests that responsible AI implementation in HRM requires a connection between broad governance principles and the specific decisions for which AI is used. Principles such as fairness, accountability and understandability provide a basis for evaluating AI-assisted HR practices, but their practical value depends on how organisations translate them into responsibilities and procedures.

This conclusion is consistent with the literature on responsible AI in HRM. Bujold et al. (2024) emphasise the need to understand the risks and limitations of AI use in HR processes. Fabris et al. (2025) demonstrate the complexity of fairness across algorithmic hiring, while Naoum et al. (2026) show that AI can have both beneficial and adverse implications for diversity, equity and inclusion. Together, these studies support function-specific assessment rather than assuming that a general ethical commitment is sufficient.

The analysis also highlights the need to distinguish governance guidance from legal requirements. India's AI Governance Guidelines provide a policy framework, whereas the Digital Personal Data Protection Act and Rules establish legal provisions with their own scope and commencement arrangements. Treating these instruments as interchangeable could lead organisations to overstate their legal obligations or overlook provisions that will become operative at a later date.

The phased commencement of the data-protection framework is particularly relevant to organisational planning. Organisations can review data flows, establish responsibilities, assess existing practices and prepare appropriate procedures in advance. However, preparatory good practice should not be confused with a claim that all substantive statutory duties are already in force. Legal status must be checked at the date of implementation or publication.

The proposed matrix offers a practical way to structure this work. It connects each HR function with a principal risk, a relevant governance consideration and a set of proposed safeguards. It is deliberately not a maturity model or a compliance certification system. Developing such a model would require defined assessment criteria, testing and evidence about how the proposed controls perform in different organisational settings.

The paper's contribution should also be understood in light of recent conceptual work. Aruchamy (2026) has already proposed a broad Responsible AI-HRM framework involving data governance, fairness, transparency, human oversight and monitoring. The present paper does not claim that these general concepts are new. Its narrower contribution is to map the Indian governance and data-protection context to individual HR functions while explicitly

distinguishing statutory requirements, policy guidance and additional organisational recommendations.

8. Managerial Implications

The analysis has five practical implications for HR managers and organisational decision-makers.

First, organisations should identify the purpose of every AI application used in HR. A system should not be introduced simply because it is available or can process large volumes of data. Its intended use and the HR decision it supports should be clearly documented.

Second, the level of oversight should reflect the potential consequences of the decision. Systems that influence recruitment, promotion or performance assessment warrant careful review because their outputs may materially affect individuals. Human oversight should involve the ability to question and review an output rather than merely approving it without examination.

Third, organisations should review the data used by AI systems. Incomplete, outdated or unsuitable information can produce misleading recommendations. Data access, accuracy, security and appropriate use should be addressed according to the nature of the system and applicable legal requirements.

Fourth, HR managers should work with IT, legal and compliance personnel rather than treating responsible AI as an exclusively technical or HR issue. Shared responsibility helps organisations understand both system limitations and the legal context.

Fifth, organisations should periodically review whether an AI application continues to serve its intended purpose. A system's usefulness should not be assumed to remain constant as jobs, workforce composition, data and organisational priorities change.

These implications are proposed management recommendations derived from the documentary analysis. They should be adapted to the specific system, organisational context and legal requirements applicable to the organisation.

9. Conclusion

Artificial intelligence can support recruitment, learning and development, performance management, workforce planning and employee monitoring. However, its organisational value depends on how systems are selected, the suitability of the data and criteria they use, and the manner in which their outputs influence decisions affecting people.

This paper examined the relevance of India's AI Governance Guidelines, 2025, and the Digital Personal Data Protection Act, 2023, together with the Digital Personal Data Protection Rules, 2025, to AI-assisted HRM. The documentary analysis developed a function-specific implementation matrix connecting HR risks with governance considerations and proposed organisational safeguards. It also distinguished policy guidance from statutory provisions and emphasised the importance of checking the phased commencement of the data-protection framework.

The central implication is that responsible AI in HRM requires practical governance arrangements rather than a general declaration of ethical intent. Organisations need clear purposes, defined responsibilities, suitable data practices, appropriate review of consequential outputs and continuing monitoring. The proposed matrix provides a structure for organising these activities, but it is not an empirically validated model and does not establish legal compliance.

Further research could examine how Indian organisations implement these safeguards, compare practices across sectors and organisational sizes, and assess whether specific controls improve fairness, employee trust and decision quality. Such work would provide the empirical evidence needed to evaluate and refine the proposed implementation structure.

10. Limitations and Future Research

This study has several limitations. First, it relies on documentary analysis and selected published literature rather than primary data. It therefore cannot establish the prevalence of AI use in Indian HR departments or determine whether the proposed safeguards are effective in practice.

Second, the study is not presented as an exhaustive systematic literature review. The selected sources support the conceptual and documentary analysis, but the paper does not report a completed database search, screening flow or comprehensive inventory of eligible studies. A submission that describes itself as a systematic review would require a documented and reproducible search and selection process.

Third, the legal analysis is limited to the selected Indian AI governance and data-protection instruments. Other laws and obligations may be relevant to a particular employment decision or organisation. The legal status of provisions must be checked again at the time of submission and implementation because the Act and Rules have phased commencement arrangements.

Fourth, the implementation matrix represents the author's proposed synthesis. It has not been tested through interviews, case studies, surveys or organisational audits. Its practical usefulness and effectiveness remain open to empirical assessment.

Future research could use case studies, interviews with HR professionals, comparative organisational assessments or controlled evaluations of selected

safeguards. Research could also examine how governance practices differ across recruitment, performance management and employee monitoring, and whether organisational size or sector affects implementation.

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