

Ontological Dignity as A Technical Limit: A Convergent Reading of European Legislation on AI and Catholic Social Teaching

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ABSTRACT: *This article examines the normative and ethical convergence in the protection of workers in the context of the deployment of artificial intelligence systems, through a comparative study of the legal framework of Regulation (EU) 2024/1689 on Artificial Intelligence (hereinafter, the AI Act) and the anthropological principles set out in Pope Leo XIV's encyclical letter Magnifica Humanitas. The article reflects on the need to preserve the primacy of the human person in the workplace. It analyses the mechanisms established by the AI Act in relation to AI systems in employment and contrasts them with the anthropological categories developed by Leo XIV in Magnifica Humanitas, in particular the critique of the technocratic paradigm and the affirmation of an ontological dignity that is not dependent on performance. The article concludes that, whilst the AI Act establishes a framework for risk management and procedural safeguards, the encyclical provides an ontological foundation that protects workers from technological dehumanisation and algorithmic instrumentalisation. Both sources converge on the same objective: to subordinate the development of artificial intelligence to the dignity of the worker, combining the legal effectiveness of the European regulatory framework with the anthropological foundation that gives it its ultimate meaning.*

KEYWORDS – *algorithmic management, Catholic social teaching, human dignity, labour law, technocratic paradigm.*

I. INTRODUCTION: A PARADIGM SHIFT IN THE WORLD OF WORK

The transition towards a digitalised, AI-driven economy is not merely a technical advance, but what might be described as a paradigm shift. This transformation directly calls into question the categories that structure the employment relationship, as the employer's managerial authority is now reinforced by automated capabilities for inference and supervision. In this context, a regulatory framework is needed that governs the technical system whilst, at the same time, placing the dignity of the worker at the centre.

This need has been addressed through two distinct, yet converging, approaches. On the one hand, the European Union has developed a risk-based legal framework through the AI Act [1]. On the other hand, the Catholic Church, through the encyclical letter *Magnifica Humanitas* [2], has proposed an anthropological and ethical framework rooted in the social doctrine established by [3]. This article compares both instruments in order to assess how each contributes to protecting workers from the risks associated with algorithmic management, arguing that legal safeguards and ontological foundations are complementary rather than redundant.

This convergent analysis does not start from scratch. European labour law doctrine has for several years been warning that the protection of workers against so-called algorithmic management is not limited to the regulatory technique employed. Adams-Prassl posed the seminal question of *What if your boss was an algorithm?* [4],

placing algorithmic management, and not merely the replacement of jobs by machines, at the centre of the debate on automation and the future of work. Subsequently, in their work *Your Boss is an Algorithm: Artificial Intelligence, Platform Work and Labour*, Aloisi and De Stefano analyse, from a socio-legal perspective, the specific functioning of such algorithmic management and advocate for the role of collective labour law in consolidating the European *human in command* approach, according to which artificial intelligence systems must always remain under human control [5]. More recently, and now in the context of the development of the European regulatory framework, these same authors have systematised the structural tension running through it: that between risk mitigation and the effective enforcement of labour rights [6].

At the same time, ecclesiastical reflection has followed its own path: the *Antiqua et Nova* Note and *Magnifica Humanitas* itself form part of a doctrinal tradition that situates artificial intelligence within the *Compendium of the Social Doctrine of the Church*. This article aims to bring these two lines of reflection, European legislation and Catholic doctrine, into explicit dialogue.

The aim of this study is therefore twofold: firstly, to identify how the AI Act classifies and regulates AI systems used in the workplace, and secondly, to examine how the encyclical *Magnifica Humanitas* reframes the debate on work and technology in terms of human dignity, and to highlight the points of convergence and divergence between the two.

From a methodological perspective, the article adopts a qualitative and comparative legal approach. It examines the provisions of the AI Act governing the use of AI systems in the workplace in the light of the anthropological and ethical principles set out in the encyclical *Magnifica Humanitas*. Through this convergent analysis, the study demonstrates how the legal safeguards established by European legislation and the Christian conception of the inherent dignity of the human person complement and reinforce one another in the protection of workers.

II. THE AI ACT ON AI IN THE WORKPLACE: CLASSIFICATION, PROHIBITION AND SAFEGUARDS

The European legislator has identified employment as one of the areas most vulnerable to the adverse effects of AI, and the AI Act addresses this through a framework combining classification, prohibition, transparency and oversight.

The first pillar of this framework is classification. AI systems intended for the recruitment or selection of workers, as well as those used to make decisions on working conditions, promotion or the termination of contracts, are classified as high-risk systems under Article 6(2) and Annex III(4). This classification is not a mere formality: it reflects the legislator's recognition that such systems can significantly affect a person's livelihood and career prospects and gives rise to the full set of obligations (risk management, technical documentation, data governance and human oversight) that the AI Act reserves for its most sensitive category.

In Spanish legal scholarship, Barrio Andrés emphasises, in his commentary on Article 6 and Annex III of the AI Act, that the inclusion of AI systems used for decision-making affecting working conditions amongst high-risk uses is not coincidental, but rather the result of identifying employment as one of the areas in which the information asymmetry between the system operator and the affected individual is most pronounced [7]. Along the same lines, Aloisi warns that classification as high-risk only effectively protects workers if it is combined with rights of access, non-discrimination and collective participation, and is not limited to mere compliance on paper [8].

The second pillar is the prohibition. Article 5(1)(f) expressly prohibits the use of AI systems to infer the emotions of a natural person in the workplace, except where such use is justified on medical or safety grounds. Unlike the 'high-risk' regime, which manages a hazard, this provision eliminates it entirely: it protects the very essence of workers' privacy against a form of surveillance that is both invasive and, according to the AI Act's own assessment, pseudoscientific in its attempt to interpret internal states based on external signals.

The third pillar concerns transparency. Article 26(7) requires employers using high-risk systems to inform workers' representatives and the workers concerned before the system becomes operational. This initial duty to provide information is complemented by the right, set out in Article 86, to receive clear and meaningful explanations regarding certain individual decisions taken on the basis of the results of high-risk AI systems.

Labour law scholarship qualifies the actual scope of this duty to inform. Aloisi argues that transparency is only effective when linked to collective rights of participation, and not as a mere individual notification, in the absence of such mechanisms, the worker may be aware of the system's existence without having any real means to challenge its results [8]. De Stefano and Taes reach a similar conclusion based on their study of collective bargaining, arguing that it is collective agreements, rather than the law alone, that have succeeded in establishing effective limits on algorithmic surveillance in the workplace [9].

The fourth pillar is oversight. Article 14 requires that high-risk AI systems allow for effective human oversight, in particular to address automation bias, understood as the tendency to uncritically accept the outcome of an algorithm. This safeguard is complemented by the data governance requirements of Article 10, which mandates appropriate measures to detect, prevent and mitigate potential biases affecting fundamental rights.

Taken together, these four pillars demonstrate that the AI Act does not merely tolerate AI in the workplace: it subjects it to a regulatory framework designed, article by article, to guarantee workers' fundamental rights and ensure that any decision affecting them remains subject to human oversight, rather than uncontrolled automation.

In summary, legal scholars agree that the AI Act sets out a robust framework of procedural safeguards, though one that is incomplete if applied in isolation: the AI Act is constantly torn between risk mitigation and the effective enforcement of labour rights [6], a tension which, as will be argued in Section IV, finds an additional criterion for resolution in Catholic social teaching.

III. MAGNIFICA HUMANITAS: THE ONTOLOGICAL DIGNITY OF THE WORKER

Pope Leo XIV's encyclical elevates the debate on technology to a matter of Christian humanism, contributing concepts that go beyond the strictly legal sphere in which the AI Act operates.

This intervention by Leo XIV is not an isolated episode in the Magisterium, but the culmination of a recent development. As early as 28 January 2025, the Dicastery for the Doctrine of the Faith and the Dicastery for Culture and Education had published the Note *Antiqua et Nova*, on the relationship between artificial intelligence and human intelligence, which expressly distinguished between human intelligence, which is embodied, relational and open to the truth, and the purely computational capacity of AI systems [10]. *Magnifica Humanitas* takes up this distinction and makes explicit reference to the world of work, contributing to the gradual incorporation of artificial intelligence into the body of the Compendium of the Social Doctrine of the Church [11].

Chapter III of the encyclical, *Technology and Dominance. The grandeur of humanity in light of the promises of AI*, opens with a question of a directly anthropological nature: in the face of transhumanist and posthumanist narratives, what constitutes the greatness of the human person, now that AI is capable of imitating much of what was previously considered unique to human beings? Leo XIV's response focuses on what he terms the technocratic paradigm, previously denounced by his predecessor, Pope Francis, in his encyclical *Laudato Si'* [12], in which efficiency and control become the sole criteria of value, reducing the person to a mere function within a system geared exclusively towards productivity and profit.

In response to this line of argument, the chapter emphasises that AI can simulate much of human behaviour, but possesses neither moral conscience, nor empathy, nor an emotional or spiritual life; and that the ontological dignity of the human person does not depend on productivity or efficiency and, therefore, cannot be earned, lost or quantified by any system, however sophisticated it may be.

This assertion is not an isolated insight from the encyclical, but a principle already firmly established in the social doctrine of the Church. The Note *Antiqua et Nova* itself maintains that equating artificial intelligence with human intelligence leads to a form of functionalism that measures dignity by utility, whereas the dignity of the

person is intrinsic to the human being because it is founded on the image of God, and does not depend on their capacities, their performance or their social utility [10]. *Magnifica Humanitas* updates this principle in the face of a challenge that the *Compendium of the Social Doctrine of the Church* [13] was unable to foresee with the same degree of specificity: the technical possibility of simulating, and not merely replacing, a significant part of human behaviour.

Chapter IV, *Safeguarding Humanity at a Time of Transformation. Truth, Work, Freedom*, then applies this anthropological assertion to the specific sphere of work. Building on the tradition established by *Rerum Novarum* [3], the encyclical reaffirms the value of work and advocates for an economy that values dignity over mere production. In the same chapter, Leo XIV addresses the problem of unemployment and warns that AI, despite its promises of productivity, risks deskilling workers and confining them to rigid and repetitive tasks that erode, rather than develop, their capabilities.

This assessment coincides, albeit from a different perspective, with what much of European labour law doctrine has documented empirically: processes of de-skilling and algorithmic control of the pace of work have been described in sectors as diverse as logistics, home delivery and customer service centres [4], [5], confirming that Leo XIV's warning is not merely speculative, but reflects labour market transformations that have already been documented.

The third strand of the chapter, the safeguarding of freedom against dependency and commodification, extends this analysis to the realm of power: the concentration of control over algorithmic systems in a few hands generates a new economic and political asymmetry, which the encyclical describes in terms of new forms of servitude, and which, according to the encyclical, requires social justice to set the course for technological design from the outset.

Taken together, this development demonstrates that the encyclical does not merely warn of the risks of artificial intelligence in the workplace: it subordinates its development to the ontological dignity of the worker, demanding that no technological transformation be legitimised if it reduces the person to a mere function, makes employment precarious through deskilling, or deepens the power asymmetry between those who control algorithmic systems and those who depend on them for their livelihood. It calls for human beings to retain ultimate control, what the AI Act refers to as human oversight.

IV. COMPARATIVE ANALYSIS: RISK MANAGEMENT VERSUS SAFEGUARDING THE HUMAN PERSON

Read together, the AI Act and the encyclical *Magnifica Humanitas* do not merely run parallel to one another: several provisions of the AI Act can be interpreted as the legal translation of the concerns raised by the encyclical from an anthropological perspective.

The classification of recruitment and personnel management systems as high-risk under the AI Act (Art. 6(2) and Annex III(4)) applies, in legal terms, precisely where the encyclical directs its critique of the technocratic paradigm (Chapter III): both instruments focus, from different perspectives, on situations in which technological systems affect a person's livelihood. Whilst the AI Act addresses this aspect through risk categories and documentation requirements, the encyclical asks what is owed to the person at that moment, and answers: the recognition of a face, not merely the assessment of a function.

This same correspondence has been highlighted, albeit in different language, by Spanish legal doctrine: in commenting on Article 6 and Annex III of the AI Act, it has been noted that the European legislator deliberately chose to protect employment as an autonomous risk category, precisely because in this area the AI system is not limited to assisting a decision, but can completely replace human judgement regarding a person's value to the organisation [7], a description which, in essence, coincides with what the encyclical denounces: that the human person is valued exclusively on the basis of their productive utility.

The prohibition on the inference of emotions in the workplace (Article 5(1)(f)) may likewise be interpreted as a partial legal translation of the encyclical's broader requirement that AI be disarmed whenever it threatens to

dominate the human person (Chapter III): the AI Act prohibits a specific technique of domination, whilst the encyclical generally rejects any use of technology aimed at the control and subjugation of the human person.

Labour law doctrine itself recognises the limits of this legal translation: a scalable and decentralised framework is inadequate for safeguarding fundamental rights, which do not admit of gradation [6], whilst the encyclical's anthropological requirement, that AI must not dominate the human person, is, by definition, broader than any sector-specific prohibition that the legislator might enumerate. It is precisely this asymmetry between the scope of the ethical principle and that of the specific legal provision that justifies the need to interpret both frameworks in conjunction.

A similar correspondence can be observed between the duty to inform workers and their representatives (Art. 26(7)) and the encyclical's emphasis, in Chapter IV, on honest dialogue and the shared search for truth as the basis of the employment relationship. Here, however, the two sources diverge as to what they consider the purpose of the information to be. According to the AI Act, information functions primarily as a procedural safeguard that ensures decisions can be challenged. The encyclical takes the analysis further by presenting dialogue as a constitutive element of human relations, irrespective of any dispute it may help to resolve.

The same divergence, now framed as a difference of principle rather than of consequence, is reflected in the requirement for human oversight (Art. 14): the AI Act requires oversight to correct automation bias, a technical risk, the encyclical calls for care, understood as the recognition of a human face, which is not a form of error to be corrected, but a good to be pursued in its own right.

For this reason, the operational instruments of the AI Act, notably the fundamental rights impact assessment required under Article 27, remain necessary, but are not sufficient. They provide the means to identify, document and remedy a violation. This article argues that these legal instruments cannot, on their own, provide the underlying anthropological criterion by which technology must be judged. *Magnifica Humanitas* can provide this criterion by asking whether technological progress makes human life more humane and more respectful of the dignity of the person. In this sense, the AI Act limits what can legally be done with AI in the workplace, whilst the encyclical provides guidance on why it should be done in the first place; the protection of workers in the coming years will depend on both aspects being maintained in tandem, rather than treated as self-sufficient elements.

V. CONCLUSION: TOWARDS AN AI AT THE SERVICE OF THE HUMAN PERSON

The integration of AI into the world of work must avoid what might be termed a new Babel syndrome, a scenario in which the uniform language of algorithms prevents an understanding of the diversity of human circumstances and ends up silencing or excluding those in the most vulnerable positions.

The AI Act provides a robust legal safeguard, particularly by prohibiting emotion inference in the workplace and requiring transparency in high-risk workplace systems. However, this regulatory framework would remain incomplete without the ethical compass provided by *Magnifica Humanitas*, which reminds us that the human person is always an end never merely a means.

The future of work should not be a ruthless selection between those who adapt to the algorithm and those who do not. It should be a courageous and shared responsibility, in which technology is geared towards liberating human capabilities rather than creating exclusion. Ultimately, protecting workers in the age of AI requires that human intelligence, with its conscience and freedom, continues to guide and set the limits of technical innovation.

This study is limited to a doctrinal comparison between the AI Act and *Magnifica Humanitas* and does not assess the implementation of AI systems in specific workplaces. Future empirical research should examine how these complementary legal and ethical criteria can be incorporated into fundamental rights impact assessments, collective bargaining and corporate AI governance.

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