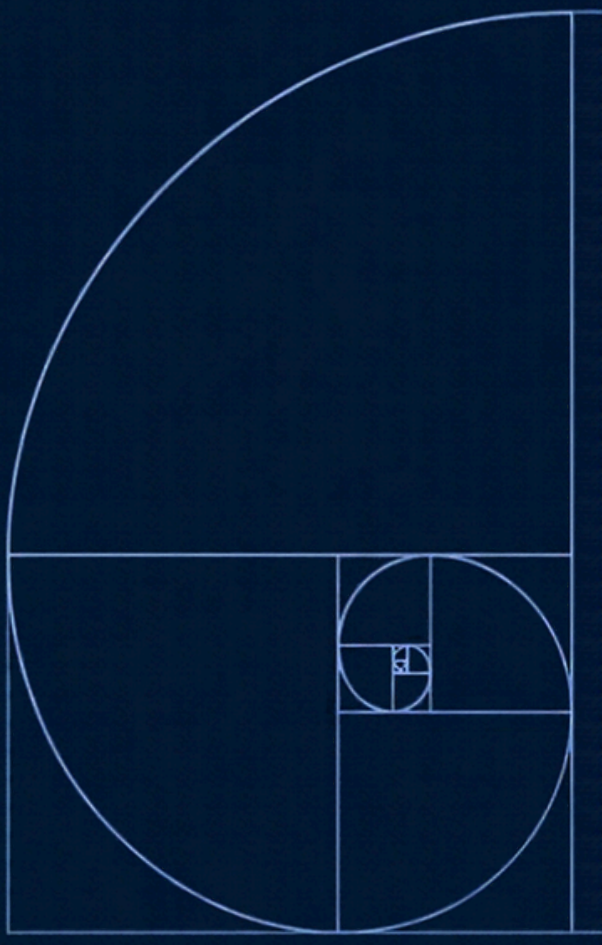
REPORT

The Human Behind It: what 53 small companies told us about running AI

A snapshot of AI governance in SMEs

Human Oversight Labs · art50compliance.eu

October 2026



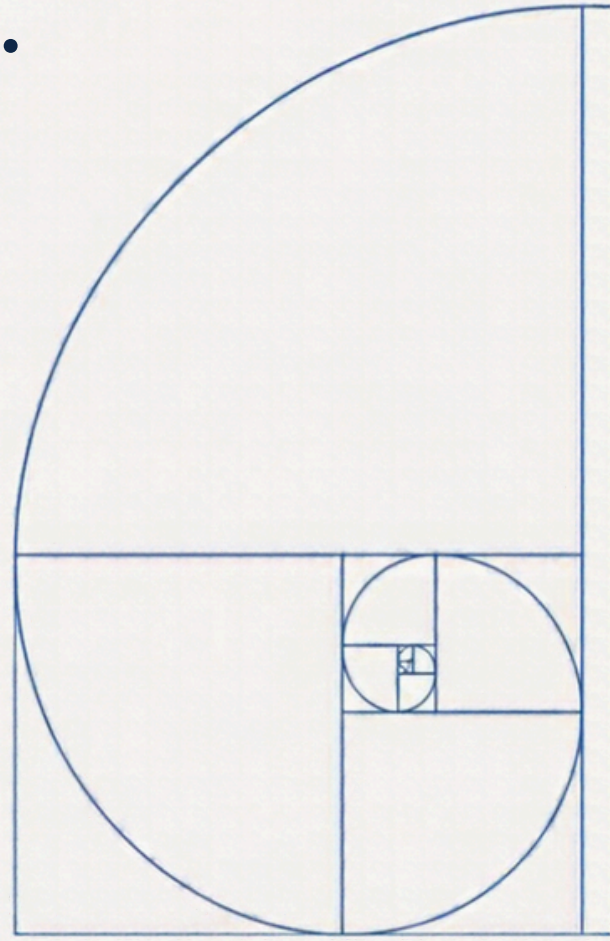
HEADLINE FINDING

59%

of companies had already been asked about their AI use by a client, customer or partner.

9%

had changed anything concrete because of the EU AI Act.



AT A GLANCE

Six key numbers to take into account when dealing with AI governance in small organisations.

59%
asked by clients or partners

9%
made a concrete AI Act-related change

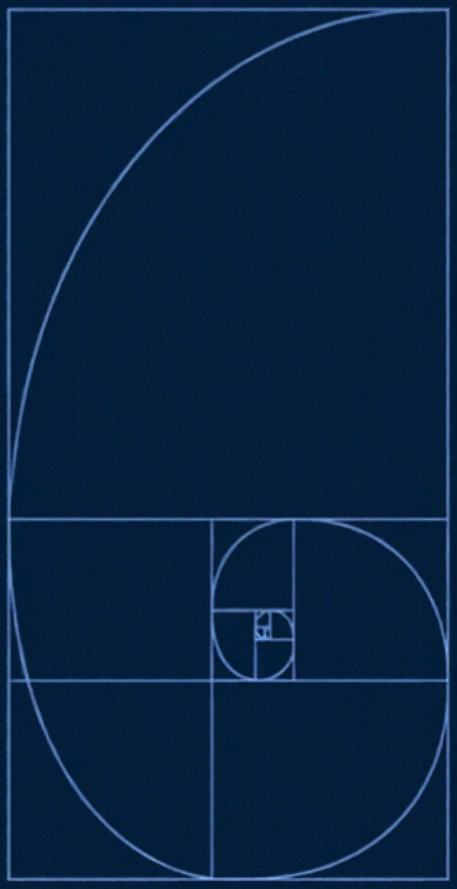
64%
have a person check AI output

50%
keep a written record of AI use

75%
brought in AI by founder decision

28%
can't prove the human check

About This Study



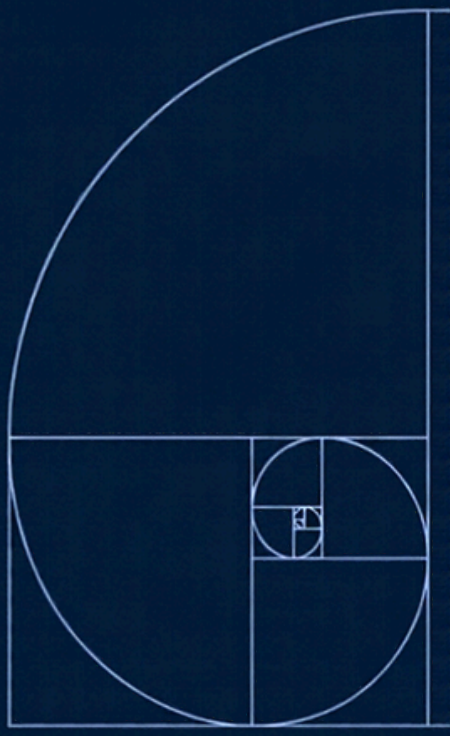
In September 2026 we put eight open questions to people whose organisations use AI. 62 replied by email between the 15th and 21st of September; we analysed the 53 that described their own organisation.

1. What is AI used for where you work?
2. How did those uses come about, and who decided?
3. Is there a record of where AI is used, and who keeps it?
4. Is there an approval process for new AI tools?
5. Has the AI Act changed anything about how you work?
6. Has anyone outside your organisation asked about your AI use?
7. How do you think enforcement will play out?
8. Which questions are you finding hard to answer?

LIMITATIONS

Respondents chose to reply voluntarily and the answers were free text, then coded by category. Each percentage is based on the people who answered that question, so bases can vary (39–53). With about 40 answers, any figure could be roughly 15 points higher or lower. **Results describe this group and must not be taken as representative of the whole market.**

Who Answered



Most were founders of small firms, answering for the company they run.

Founders	45 of 53 are founders, CEOs or owners
Company size	Of 19 who gave a size: 10 solo, 7 with 2–10 people, 2 with 11–50
Countries	17 of 31 in the US, 4 in the UK, 5 in the EU (Germany, Spain, Czech Republic, Greece)

19 use AI in their own work, 16 sell AI-based products, 13 are agencies, 5 are consultants.

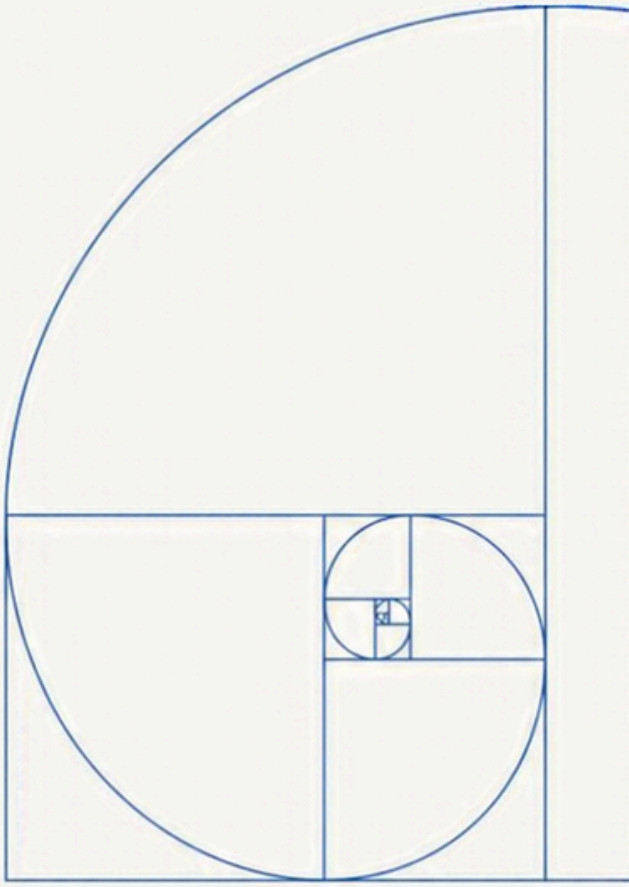
FINDING 1

01 Customers are asking before the regulators

59%

were asked about the AI usage by a client, customer or partner

The questions arrive in security reviews, procurement forms and sales calls. Buyers want to know where their data goes, whether it is kept or used for training, and whether a person checks what the AI produces. Meanwhile only 4 of 44 companies had changed anything concrete because of the AI Act. Out of the 29 who gave a view on enforcement, 7 expect the first pressure on small firms to come through customers, contracts and insurers. Not everyone is being asked: 9 of 39 said nobody outside had ever raised it.



> “Small companies will feel the AI Act as paperwork from their customers before they ever hear from an authority.”

Founder of a custom software firm in the United States

FINDING 2

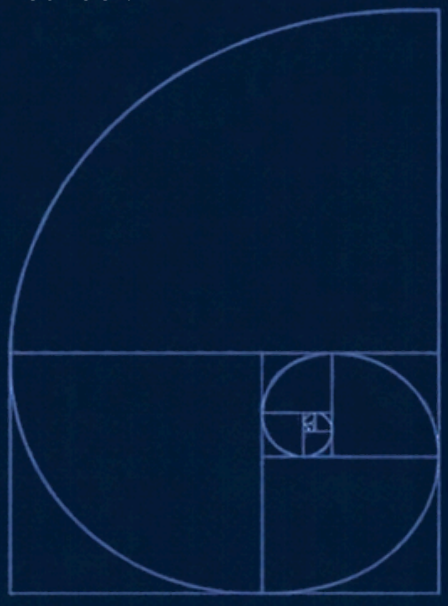
The check sits on the output, not the tool

64%

Have a person read or approve AI output

Just over half described set steps for adopting a new tool, but the safeguard most pointed to is a named person between the AI and the outside world. Only 4 of 53 had no approval step at all. Half keep a written record of where AI is used; 7 more say their code or tools are the record. Nobody named a dedicated AI governance role. In most cases it was the founder.

> “Our approval process doesn’t take place before adoption, but before shipping: nothing an AI produces goes out until the person accountable for it has read it.”
>
> CEO of a software company in Greece



11 OF 53 DESCRIBED THIS APPROACH

01 AI records what it would do, without acting

02 a person approves every output

03 acts alone after clean audits

FINDING 3

03

The hard part is proving the human was there

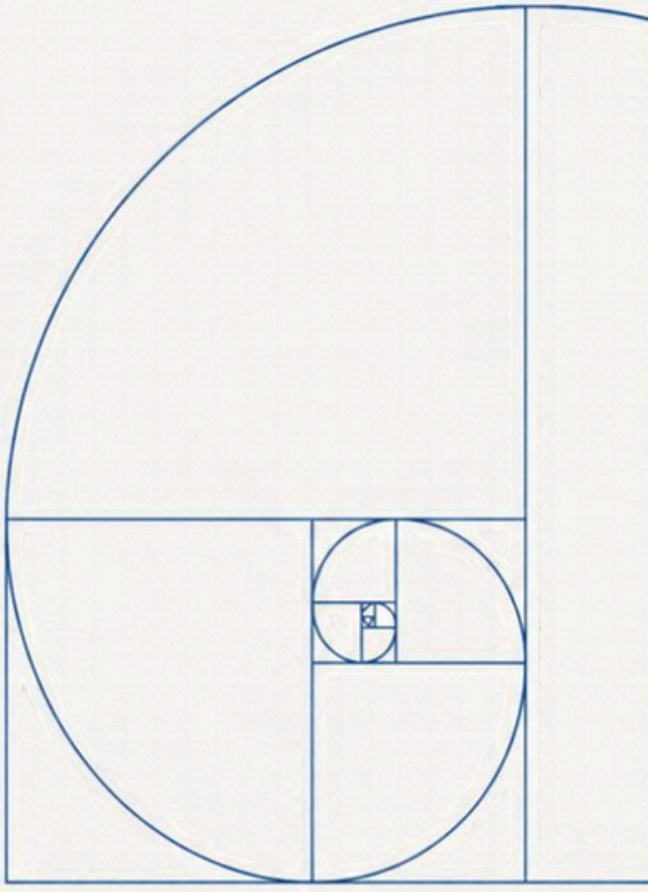
28%

can't find out how to prove the check or where an AI label belongs (12 of 43)

Having a review step is one thing; showing a client months later that it happened is another. 17 of 43 asked whether the rules apply to them at all, or who is responsible when AI gets it wrong: the model provider, the software vendor or the customer. 8 asked what vendors really do with their data.

What respondents can't get answered (of 43)





> "And if the important thing is human oversight, how do I prove six months later that I really did all of that?"

Co-founder of an AI publication in Serbia

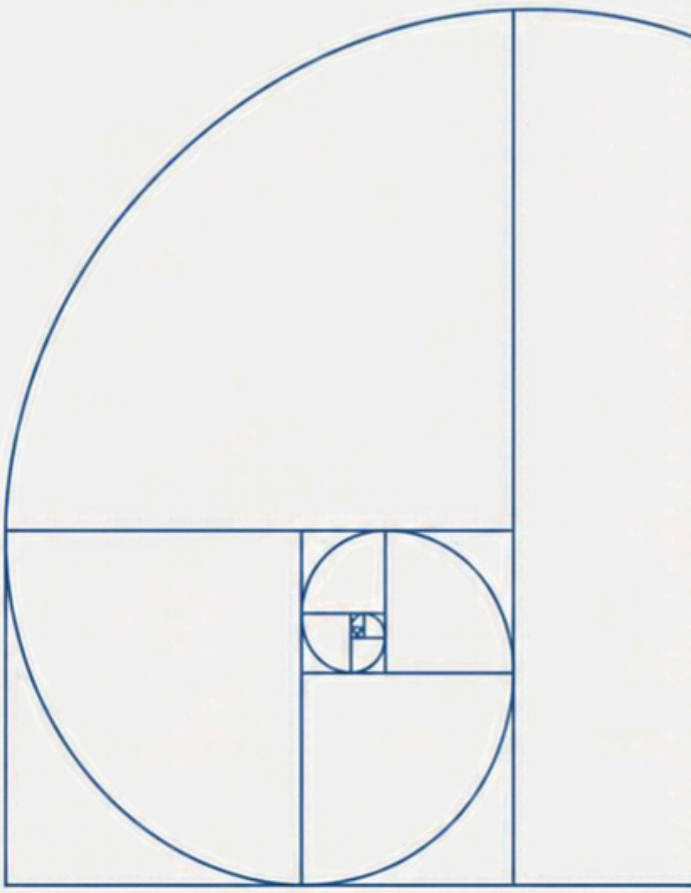
The AI Act has barely reached the working week

59%

said the AI Act had changed nothing in how they work.

32%

said it changed how they think or what they document.

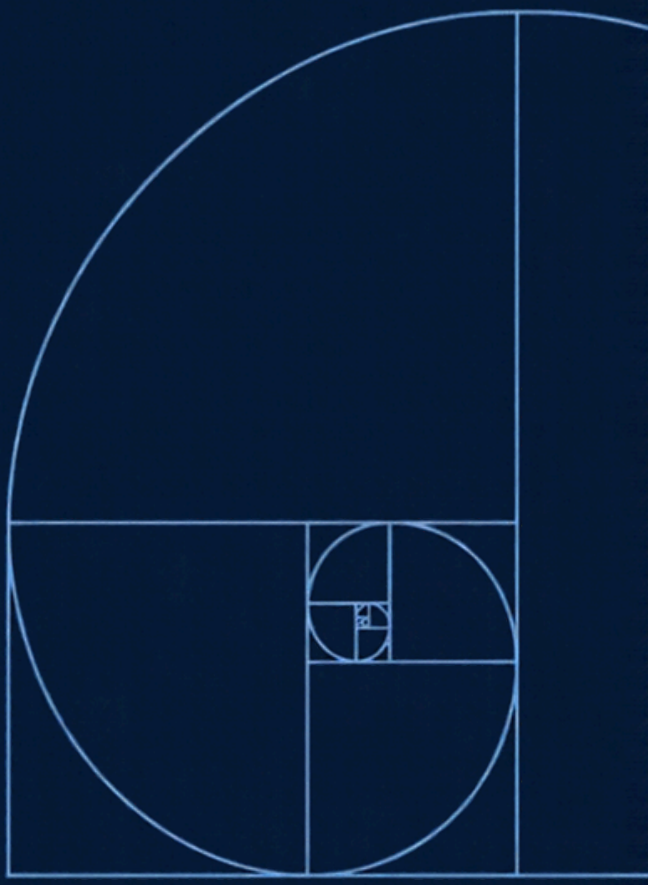


Of 4 concrete changes, 2 were AI labels under the transparency rules. Only 1 of 5 EU-established firms had changed a practice.

ENFORCEMENT

Three camps, one common point: what a company can show

We asked how enforcement will play out. Of the 29 who gave a view, most fell into three camps.



> “The first real consequences for small firms won’t come from a regulator. They’ll come from a client, a licensing board or an insurer asking to see the list and finding there isn’t one.”

Co-founder, AI training firm and brokerage, United States

WHERE ENFORCEMENT LANDS FIRST

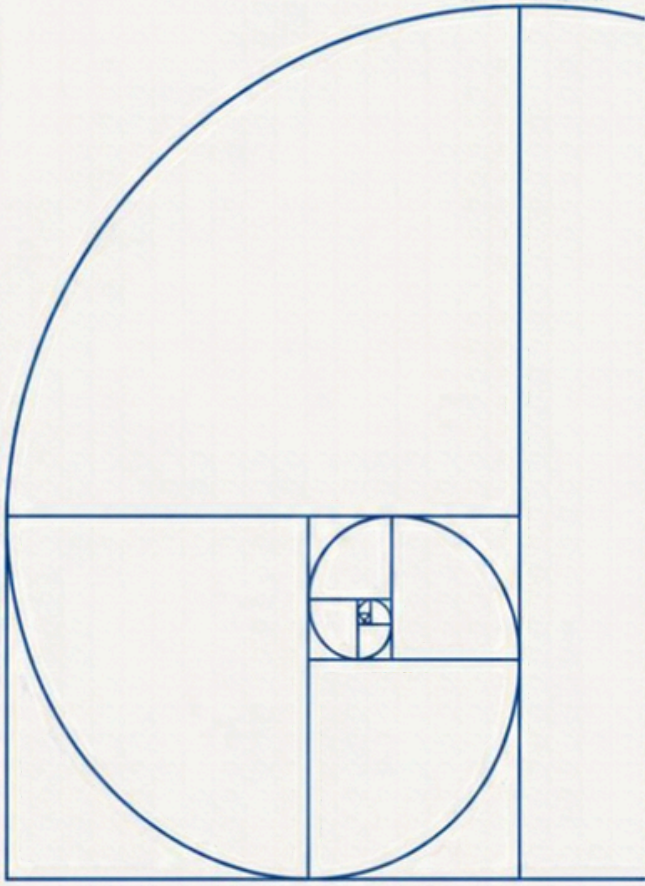
01 Visible and documented cases (10)

02 Large firms and high-risk uses (9)

03 Customers and insurers, before regulators (7)

Five lessons for a small company

1. Prepare for your customers' questions
2. Write down the list, where the work happens
3. Put the check on the AI output
4. Let automation earn its freedom
5. Keep evidence that the check happened



CHECK YOUR OWN COMPANY

Could you answer a client's AI question in writing today?

Is there a list of your AI tools with an owner for each?

Does a named person read AI output before it goes out?

Could you prove it six months from now?

Do you know where an AI label is needed?

DISCLOSURES

How to read this study

Who produced this study. Human Oversight Laboratories OÜ makes Art50, a product for documenting human review of AI output. We do have a commercial interest in this topic.

How replies were collected. Between 15 and 21 September 2026 we sent eight open questions through specialised services. Participation was voluntary and unpaid.

Sample. Self-selected, not representative of small businesses as a whole. Of the 53 companies, 45 were represented by a founder, CEO or owner. Of the 31 who gave a country, 17 were in the US and 5 in the EU.

Precision. Each question has 29 to 53 answers. With about 40, a percentage could be roughly 15 points higher or lower by chance, so we round and give counts for small groups.

Included and excluded. We received 62 replies and analysed 53. We excluded 9: 3 pitches, 4 that answered only two questions, 1 hypothetical, 1 adviser answering for clients.

Verification. Answers are self-reported and not independently verified. Some may be AI-assisted. We re-ran every finding without 11 flagged replies.

How answers were coded. We read each answer and sorted it into categories. This takes judgement, and others might code some differently, especially AI Act changes (4 concrete, 14 changes in thinking only).

Use of AI. Claude (Anthropic) helped code and tabulate the anonymised answers, and supported the drafting of this report. The Art50 team checked figures and quotes against the original replies.

Quotes and consent. Quotes are verbatim. Respondents could choose to be named or anonymous. Anyone who gave no preference is described by role and sector only.

Personal data. Contact details are used only for this study and are never published. To correct or delete a reply, please write to contact@art50compliance.eu.

Funding and corrections. No one outside Human Oversight Laboratories OÜ funded or influenced this study. If you spot an error and would like to help us correct it, write to contact@art50compliance.eu.

Not legal advice.

ART50

Show the human behind it.

Art50 records who reviewed a piece of work and when, and seals it so you can show it to a client later.

