

FIBAA Internal Policy on the Use of Artificial Intelligence

The development of this Policy was informed by the *Guidelines for the Responsible Use of AI in External Quality Assurance* developed by The European Association for Quality Assurance in Higher Education (ENQA)¹.

1. Purpose

This policy aims to:

- define the principles, requirements, and guidelines for the responsible, transparent, secure, and effective use of Artificial Intelligence systems (AI systems²) within FIBAA;
- ensure compliance with applicable legal and regulatory requirements, including the EU AI Act, the General Data Protection Regulation (GDPR), and other relevant national and international regulations;
- ensure that AI systems support, but do not replace, professional judgment, expert evaluation, and human decision-making in FIBAA's quality assurance activities;
- ensure that the use of AI systems is aligned with FIBAA's mission and vision, values, quality standards, and commitment to integrity, independence, fairness, and transparency;
- support the appropriate and ethical use of AI systems in FIBAA's operational, administrative, and quality assurance activities;
- establish clear responsibilities, accountability mechanisms, and human oversight for the use of AI systems;
- identify, assess, and mitigate risks associated with the use of AI systems;
- promote AI literacy and awareness among FIBAA staff and stakeholders;
- encourage innovation and efficiency while maintaining the quality, reliability, and credibility of FIBAA's processes and decisions;

¹ [Guidelines for the Responsible Use of AI in External Quality Assurance](#)

² **An AI system** is a software application, platform, or service that uses artificial intelligence techniques—such as machine learning, natural language processing, or computer vision—to perform tasks that normally require human cognitive abilities, including analysing information, generating content, recognising patterns, making predictions, or supporting decision-making.

- complement FIBAA's existing regulations, policies, and procedures related to quality assurance activities.

2. Scope

This policy applies to all FIBAA employees, external experts, consultants, committee members, and other FIBAA representatives and individuals acting on behalf of FIBAA who use AI systems in connection with FIBAA activities.

The policy covers the use of AI systems in all operational, administrative, communication, project-related, and quality assurance activities conducted by or on behalf of FIBAA, including but not limited to accreditation and certification procedures, evaluations, assessments, report preparation, data analysis, research, stakeholder communication, and internal management processes.

The policy applies regardless of whether AI systems are used on FIBAA devices, personal devices, cloud-based platforms, or other digital environments when such use relates to FIBAA activities.

The policy does not replace applicable legal, regulatory, contractual, data protection, confidentiality, information security, or quality assurance requirements. Where specific regulations impose stricter requirements, those requirements shall prevail.

The use of AI systems in activities involving accreditation judgments, quality evaluations, recommendations, or decision-making processes shall remain subject to appropriate human oversight and professional responsibility in accordance with FIBAA's regulations and procedures.

3. Guiding Principles

As a quality assurance agency, FIBAA recognises the potential of AI systems to support efficiency, knowledge management, and continuous improvement. At the same time, AI must be used in a manner that safeguards the integrity, credibility, independence, and reliability of quality assurance processes. The following principles shall guide the use of AI systems within FIBAA:

3.1 Human Responsibility and Professional Judgment

AI systems may support, but shall not replace, the professional judgment, expertise, and decision-making responsibilities of FIBAA staff, experts, committees, and decision-making bodies. Final evaluations, recommendations, accreditation judgments, and quality assurance decisions shall always remain under human responsibility.

3.2 Integrity and Independence

The use of AI systems shall not compromise the independence, impartiality, objectivity, or integrity of FIBAA's quality assurance activities. Users shall critically assess AI-generated outputs and ensure that they do not introduce bias, conflicts of interest, or undue influence into evaluation and decision-making processes.

3.3 Accountability and Decision-Making Requirements

Individuals using AI systems remain accountable for the accuracy, quality, and appropriateness of the outputs they use. All AI-generated outputs used in FIBAA processes must be reviewed and validated by qualified individuals. Final responsibility for any analysis, report, or decision remains with designated experts and decision-making bodies.

3.4 Evidence-Based Evaluation

AI systems shall support, but not replace, evidence-based evaluation, expert judgment, peer review, and stakeholder consultation. All AI-generated outputs must be critically reviewed and verified before use, with particular attention to accuracy and potential bias. Accreditation and quality assurance decisions shall be based solely on verified evidence, established criteria, and expert assessment, not on AI-generated analyses alone.

3.5 Privacy and Confidentiality

Confidential, sensitive, proprietary, or personal information shall be protected at all times. Such information may only be processed through AI systems that comply with applicable legal, contractual, data protection, and information security requirements.

3.6 Compliance with Quality Assurance Standards

The use of AI systems shall be consistent with the principles and expectations of the European Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG), relevant international quality assurance frameworks, and FIBAA's own regulations, procedures, and standards.

3.7 Continuous Learning and Improvement

FIBAA shall promote responsible AI literacy and continuously monitor developments in AI technologies, regulatory requirements, and quality assurance best practices to ensure the ongoing effectiveness and relevance of this policy.

3.8. Fairness and Inclusion

AI systems shall not be used in ways that reinforce discrimination, bias, exclusion, or unfair advantages.

4. Permitted and Prohibited Uses of AI Systems

4.1 General Principle

FIBAA permits the use of AI systems as a supportive tool to enhance efficiency, consistency, and quality in administrative, analytical, and communication tasks, provided that their use complies with this policy and applicable legal and regulatory requirements.

4.2 Permitted Uses

Permitted uses of AI systems include, but are not limited to:

- drafting, editing, and improving internal documents and communications;
- translation of information;
- summarising non-confidential information;
- language editing and translation support;
- structuring and organising data;
- supporting preliminary analytical and organisational tasks that do not directly determine evaluation outcomes.

4.3 Support in Quality Assurance Processes

AI systems may be used to support:

- the assessment of evidence and interpretation of compliance with standards;
- the preparation of expert panel deliberations and related documentation;
- the drafting of accreditation or certification reports based on the approved evaluation report template and structure.

In all such cases, AI-generated outputs must be critically reviewed, verified, and validated by qualified human experts, who retain full responsibility for the final judgment and decision-making.

4.4 Prohibited Uses

The use of AI systems is strictly prohibited for generating or substituting independent expert judgments in accreditation and quality assurance processes. In particular, AI shall not be used to:

- formulate accreditation decisions;
- determine evaluation outcomes;
- produce peer review conclusions;
- issue formal recommendations regarding the quality status of institutions or study programmes.

4.5 Use in Documentation and Language Support

AI systems may be used to support the drafting, editing, and linguistic refinement of official documents, including improving wording, clarity, and structure, provided that the substantive content, meaning, and final responsibility remain with the authorised experts and decision-making bodies.

5. Data Protection, System Use and Responsibility

AI systems must be used in compliance with applicable data protection laws and FIBAA internal rules. Confidential, sensitive, or personal data must be processed only in approved, secure environments.

FIBAA stakeholders, including employees and external experts, may select and use suitable AI systems, provided they comply with applicable legal, data protection, and information security requirements. The use of public or non-secured AI systems for confidential, sensitive, or personal data is prohibited unless explicitly authorised.

Each user is individually responsible for ensuring compliance with this policy and applicable regulations. Any use of AI systems that may affect the integrity, independence, or credibility of FIBAA's quality assurance processes requires prior authorisation and appropriate human oversight.

6. Documentation and Transparency Obligations

When AI use must be documented

The use of AI systems must be documented when it has a substantive impact on FIBAA's work products or quality assurance processes. This includes, in particular:

- **Support to accreditation or evaluation processes**, such as assisting in the analysis of evidence, structuring findings, or preparing draft sections of review reports;
- **Contribution to conclusions or interpretations**, including summaries or analytical outputs that support expert discussions and deliberations;
- **Preparation of official external documents**, such as accreditation or certification reports, published statements or other formal documents;
- **Any AI-assisted content that is not purely linguistic or formatting-related**, but influences the meaning, structure, or analytical framing of a document.

Where AI has a substantive impact on FIBAA's work products or quality assurance processes, the responsible staff member shall document its use using the standard FIBAA

AI Use Documentation Form³. The documentation shall record the AI tool used, its purpose, the task performed, the human review undertaken, and confirmation that applicable confidentiality and data protection requirements were met. The documentation shall be retained with the relevant project or quality management records, while the Quality Manager may maintain a central register of significant AI use cases for monitoring and continuous improvement.

Routine or low-impact uses of AI, such as grammar correction, language polishing, translation support, or formatting assistance, do not require documentation, provided that no substantive content is generated or altered.

Where the use of AI systems is subject to documentation requirements under this policy, the following standard Transparency Note shall be included in the relevant document as a footnote.

Transparency Note on the Use of Artificial Intelligence

Artificial Intelligence (AI) systems were used in the preparation of this document to support analytical, drafting, or structuring tasks. All AI-generated inputs were reviewed, verified, and adapted by responsible experts in accordance with FIBAA's internal policy on the use of AI. The final content, conclusions, and responsibility remain solely with the designated authors and decision-making bodies.

7. Training Requirements

FIBAA shall ensure that relevant stakeholders receive appropriate guidance and training on the responsible and compliant use of AI systems in line with this policy.

8. Monitoring and Policy Review

FIBAA shall monitor the implementation of this policy and regularly, at least annually, review it to ensure its continued relevance, effectiveness, and alignment with legal and technological developments.

9. Incident Reporting and Error Handling

Any suspected misuse, malfunction, or AI-related error that may affect FIBAA processes must be reported to FIBAA management without delay. Appropriate corrective and preventive measures shall be taken to mitigate risks and prevent recurrence.

³ See Annex 1.

Annex 1

FIBAA AI Use Documentation Form

1. General Information

Project / Procedure:

Document / Work Product:

Responsible staff member:

Organizational unit:

Date or period of time of AI use:

2. AI Tool

AI system used:

☐ ChatGPT Enterprise

☐ Microsoft Copilot

☐ DeepL Write

☐ Other: _____

Version (if known):

3. Purpose of AI Use

What was AI used for?

- ☐ Drafting text
- ☐ Summarisation
- ☐ Data analysis
- ☐ Other substantive use:

Brief description:

4. Substantive Impact

Describe how AI contributed to the final work product or process.

5. Human Oversight

The responsible staff member confirms that:

- ☐ AI-generated output was critically reviewed.
- ☐ AI-generated output was corrected, if necessary.
- ☐ The final decisions and conclusions were made by a human.

Comments (if applicable):

6. Confidentiality and Data Protection

- ☐ No confidential accreditation documents or personal data were entered into an unapproved AI system.

☐ AI use complied with the FIBAA AI Policy and GDPR requirements.

Comments (if applicable):

7. Approval

Responsible staff member:

Name: _____

Signature: _____

Date: _____

Reviewed by (if required):

Managing Director / Quality Manager

Name: _____

Signature: _____

Date: _____