

Artificial Intelligence (AI) Use in CHARM-EU Erasmus+ European University Deliverables and Project Outputs

1. Context

- 1.1. The use of Artificial Intelligence (AI) systems and tools has increased across administrative, research, and educational environments in recent years.
- 1.2. Ensuring ethical, transparent, and responsible use of AI systems is important for CHARM-EU to maintain the quality, credibility, confidentiality (when required) and integrity of CHARM-EU deliverables and project outputs, while also ensuring alignment with European values, including fairness, inclusion, and data protection.
- 1.3. At this stage, there are minimal formal guidelines for the use of AI in deliverables and project outputs in Erasmus+ funded projects. However, guidance has been reported in the *Erasmus+ Programme Guide*¹, and a working document on *Guidelines On The Use Of Artificial Intelligence In Erasmus + And European Solidarity Corps Programmes*². This policy is informed by these documents.
- 1.4. Emerging European guidance indicates a move towards standardised disclosure and labelling of AI-generated content³, including the development of common EU visual identifiers and transparency mechanisms. While these standards are still under development, this policy adopts a precautionary approach by requiring disclosure of AI use in CHARM-EU deliverables and project outputs.

2. Purpose

¹ https://erasmus-plus.ec.europa.eu/sites/default/files/2025-11/programme-guide-2026_en.pdf

² <https://www.erasmusplus.it/wp-content/uploads/2026/01/AI-guidelines-for-Erasmus-and-ESC.pdf>

³ <https://artificialintelligenceact.eu/article/50/>

2.1. The purpose of this policy is to provide a clear framework for the appropriate, responsible, and transparent use of AI in the preparation of CHARM-EU deliverables and project outputs. It aims to:

- 2.1.1. Support high-quality and compliant deliverables and project outputs.
- 2.1.2. Ensure alignment with funder requirements on AI usage.
- 2.1.3. Mitigate risks related to bias, inaccuracy, plagiarism, and data protection.
- 2.1.4. Promote consistent practices across projects and work packages.

3. Benefits

3.1. The benefits of this policy are to:

- 3.1.1. Ensure consistency and clarity in the use of AI across CHARM-EU deliverables and project outputs
- 3.1.2. Strengthen quality, integrity, and compliance with European Commission funding and regulatory expectations
- 3.1.3. Mitigate risks related to misuse of AI, including issues of accuracy, plagiarism, data protection, and accountability

4. Scope

4.1. The scope of this policy applies to CHARM-EU alliance level deliverables and project outputs funded by the European Commission via the Erasmus+ European University Calls. This includes:

- 4.1.1. Funding proposals, deliverables and project outputs and monitoring reports formally produced, submitted, or reported presented at the CHARM-EU alliance level as part of CHARM-EU European University Alliance project activities (e.g. reports, toolkits, frameworks, and other documented outputs).

4.2. This policy does not apply to:

- 4.2.1. Educational, teaching, or assessment activities within CHARM-EU alliance level programmes (e.g. Master modules, student assignments, Capstone projects) or in CHARM-EU universities.
- 4.2.2. Research activities or proposals conducted by staff or students in CHARM-EU universities.
- 4.2.3. All such activities remain subject to the policies and regulations of the relevant partner institution or CHARM-EU policies governing those specific areas.

5. Principles

5.1. The use of AI in CHARM-EU deliverables and outputs should be guided by the following principles:

- 5.1.1. Transparency and disclosure: Users of AI tools should be able to explain, in general terms, how AI tools were used in preparing or assessing content.
- 5.1.2. Responsibility and accountability: Responsibility for all content remains with the individual(s) producing the deliverable or output. Accountability cannot be transferred to AI tools.
- 5.1.3. Sustainability: Users should consider the environmental impact of AI tools. It should be applied only where it adds clear value.
- 5.1.4. Proportionality: The level of oversight and review applied to AI use should be proportionate to its potential impact on the quality, accuracy, and integrity of the deliverable or project output.
- 5.1.5. Accuracy and reliability: AI-generated content must be critically reviewed and validated by a human.
- 5.1.6. Human oversight: AI must support, not substitute, human judgement.

5.1.7. Equity and Inclusion: AI should not introduce or reinforce bias or amplify inequality.

5.1.8. Data Protection: Personal data must only be processed by AI systems in full compliance with General Data Protection Regulation (GDPR) rules.

5.1.9. Respect for originality, rights and intellectual property: Outputs must be original and comply with relevant copyright and authorship rules.

5.1.10. AI literacy: Users should engage with relevant institutional AI literacy programmes and resources to ensure they have the necessary knowledge and skills to use AI tools responsibly.

5.1.11. Confidentiality

6. Definitions

6.1. **Proposals, deliverables and project outputs and monitoring reports:** A project comprises a set of activities designed to achieve defined objectives and expected results, which are produced and documented as project outputs (also referred to as “deliverables”)⁴.

6.2. **Artificial intelligence system** means a machine-based system that is designed to operate with varying levels of autonomy and that may exhibit adaptiveness after deployment and that, for explicit or implicit objectives, infers, from the input it receives, how to generate outputs such as predictions, content, recommendations, or decisions that can influence physical or virtual environments⁵.

⁴ https://erasmus-plus.ec.europa.eu/sites/default/files/2025-11/programme-guide-2026_en.pdf

⁵ <https://artificialintelligenceact.eu/article/3/>

6.3. Substantive use of AI: AI use is substantial to the extent that it 1) produces evidence, analysis, or discussion that supports or elaborates on the conclusions or findings of a deliverable or project output; or 2) directly affects the content of the deliverable or project output ⁶. 3) feed the AI tools with CHARM-EU information.

7. Policy

- 7.1. All project deliverables and outputs shall align with any applicable guidance or requirements on AI usage set out in the documentation of the funding programme under which the project is supported.
- 7.2. Project and Work package leads are responsible for ensuring that all proposals, project deliverables and outputs, and monitoring reports comply with applicable funding programme requirements on AI usage.
- 7.3. Where no formal guidance or requirements are provided by the funding programme, CHARM-EU project staff should refer to AI Guidelines for Trustworthy AI⁷, the AI Act⁸, and draft Erasmus guidelines⁹.
- 7.4. All CHARM-EU projects staff are responsible for informing themselves of the risks of using AI tools for project deliverables and outputs including but not limited to, plagiarism, inaccuracies, appropriateness, compliance with intellectual property regulations, and misrepresentation.
- 7.5. Projects and Work package leads responsible for project deliverables and outputs shall ensure that all content produced is appropriate, accurate, compliant with intellectual property regulations, and demonstrably original.

⁶ Adapated from definition within

<https://www.tandfonline.com/doi/full/10.1080/08989621.2025.2481949#d1e274>

⁷ <https://digital-strategy.ec.europa.eu/en/library/ethics-guidelines-trustworthy-ai>

⁸ <https://artificialintelligenceact.eu/>

⁹ <https://www.erasmusplus.it/wp-content/uploads/2026/01/AI-guidelines-for-Erasmus-and-ESC.pdf>

- 7.6. All project deliverables and outputs assisted by AI systems must be critically reviewed and validated by a human prior to final submission.
- 7.7. Personally identifiable or sensitive data related to project deliverables and outputs must not be entered into public or external AI tools, in line with GDPR and data protection requirements. This includes but is not limited to strategic information and governance materials, internal reports, stakeholder contributions not intended for public consumption, confidential institutional or alliance information, raw evaluation and monitoring data (i.e. survey responses, focus groups, feedback data), and deliverables or project outputs classed as SEN (sensitive).
- 7.8. This data may only be entered into institutionally internal approved AI tools where appropriate security, confidentiality, and data protection requirements are met. AI tools may be used to support drafting, editing, summarisation, or analysis, but must not be used as a sole source of content or decision-making.
- 7.9. Where AI has been used in a substantive way in the preparation of a deliverable or project output, a short disclosure statement must be included at the end of the deliverable or project output. This disclosure statement should be used and modified for each deliverable or project output¹⁰.

¹⁰ Adapted from AIHPERD Framework of good practice for writing AI disclosures.
<https://www.tandfonline.com/doi/full/10.1080/0142159X.2025.2607513#d1e593>

- 7.10. The authors acknowledge the use of <AI Tool Name and Version> (accessed <Month of Access>) for <activity>. The purpose of its use was <insert>. All AI-assisted text was reviewed and revised by the authors to ensure accuracy and clarity of meaning and the authors take full responsibility for the accuracy and integrity of the work. No personal data or confidential information was submitted to the AI tools, and no AI-generated content has been presented as the author's intellectual work.

8. Responsibility

- 8.1. The responsibility of this policy is with the Executive board

9. Related Documents

- 9.1. CHARM8 D8.3 Develop CHARM strategy, policies and procedures on teaching and learning with AI.

10.Document Control

- 10.1. Date of initial approval: Executive Board 02/07/2026
- 10.2. Date policy effective from: 02/07/2026
- 10.3. Date of next review: Academic Year 2028/2029