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GUIDELINES ON THE USE OF ARTIFICIAL INTELLIGENCE IN ERASMUS + AND EUROPEAN SOLIDARITY CORPS PROGRAMMES

Contents

Summary

Artificial Intelligence is rapidly changing how information is processed, assessed, and communicated. For Erasmus+ and ESC, this creates both new opportunities and practical challenges for applicants, National Agencies (NAs), and external experts.

This document offers high-level guidelines to help National Agencies and stakeholders navigate the responsible use of AI in programme implementation. It is not a set of fixed rules, but a flexible framework grounded in European values, including transparency, fairness, and data protection.

The guidelines:

- Map out key areas where AI may support workflows, such as feedback drafting, eligibility checks, or report summarisation;
- Highlight potential risks, including bias, overreliance, or inappropriate handling of personal data;
- Provide practical examples, case scenarios, and a reference risk matrix to help tailor safeguards based on the context of use;
- Include a FAQ section that responds to common concerns from National Agencies and beneficiaries;
- Point to existing training resources and invite further exchange across the NA network.

As AI evolves, so must our practices. These guidelines aim to encourage reflection, consistency, and informed experimentation - while remaining adaptable to each NA's operational reality.

Introduction

Artificial intelligence (AI) is transforming many aspects of society, from business and research to education and administration. As AI continues to evolve, its applications in Erasmus+ and the European Solidarity Corps (ESC) are becoming increasingly relevant. AI-driven tools, including generative AI, offer opportunities to streamline processes, improve efficiency, and enhance the quality of applications and reporting. They can support applicants in drafting proposals, assist relevant agencies in evaluating submissions, analyse the result of projects at national level to provide useful oversights or conclusions, and help manage programme implementation.

AI also raises important challenges related to fairness, transparency, data protection, and accountability. While it can enhance decision-making and administrative efficiency, it may introduce biases, errors, and ethical concerns that could impact the integrity of grant programmes.

The EU actively promotes the exploration of artificial intelligence to enhance learning experiences, personalise education, and improve administrative efficiency in line with the Digital Education Action Plan (2021-2027)[1], which highlights the transformative potential of AI and data usage in education, training and youth work. At the same time, it highlights the responsible and ethical use of AI as essential principles as set out in the AI Act[2] and in line with the Digital Education Action Plan, ensuring that new developments respect individuals' rights and promote societal well-being. Along these lines, the Commission published the *Ethical guidelines on the use of artificial intelligence (AI) and data in teaching and learning for educators*[3] in 2022.

This document explores the potential applications of AI in Erasmus+ and ESC and examines its impact on grant applications, programme administration, and decision-making processes. It provides guidance on how National Agencies (NAs) can leverage AI effectively while mitigating potential risks, ensuring that AI serves as a tool for innovation while upholding the core principles of fairness, inclusivity, and transparency.

As the policy and technical landscape evolves, these guidelines align with overarching European principles. They are intentionally high-level to ensure continued relevance. Specific implementation practices may differ over time, but the principles of fairness, transparency, and responsible use remain constant anchors for any use of AI in the Erasmus+ and ESC programmes.

To complement this high-level framework, the Commission is exploring opportunities to provide further operational support in coordination with National Agencies – including shared tools, training sessions, and examples of responsible AI use in programme management and evaluation.

[1] https://education.ec.europa.eu/focus-topics/digital-education/action-plan
[2] https://digital-strategy.ec.europa.eu/en/policies/regulatory-framework-ai
[3] https://op.europa.eu/s/z7lZ

These guidelines should align with the documentation that supports the implementation of the programme such as the guide for experts or the programme guide. If any inconsistencies arise between the information in this document and the provisions of the Erasmus+ and ESC programme guides, the latter shall take precedence. As opportunities offered by AI technology continue to evolve, so too will the associated risks, limitations, and legal frameworks. Consequently, these guidelines should be regarded as a living document that evolves in step with technological developments and practical experience across the network.

For practical illustrations, please refer to Annex 1 and 2. For a proportionality-based reflection tool to help determine appropriate safeguards, see Annex 3: Illustrative Risk Matrix.

What is artificial intelligence?

An **artificial intelligence (AI) system** is a machine-based system that employs data processing techniques - such as neural networks, algorithms, and natural language processing - to execute tasks traditionally requiring human intelligence, including learning, reasoning, and problem-solving. These systems are designed to operate autonomously with varying degrees of adaptiveness, generating outputs such as predictions, recommendations, or decisions that can influence both physical and virtual environments.

One of the most advanced applications of AI today is **generative artificial intelligence** (generative AI), which goes beyond analysing data to actively creating entirely new content, such as text, images, music, and even code. A new generation of AI tools, especially those driven by advanced generative models, is transforming our working methods.

These models function by identifying patterns and characteristics from large datasets. When prompted by a user, such as with a question or an image, they generate a response that aligns as closely as possible with the patterns they have learned. Generative AI creates content by predicting the most probable response based on the input it receives, drawing from the knowledge it has been trained on. This means its outputs are shaped by statistical likelihood rather than independent thought or true understanding of the subject matter.

In addition to generative AI, many digital tools used in day-to-day work already incorporate AI-based functionalities. Features such as auto-summarisation, spelling and grammar correction, speech recognition, automated document classification, and translation are examples of non-generative AI applications integrated into commonly used software. These functions often operate seamlessly in the background, supporting tasks such as drafting text, improving accessibility, or streamlining document handling. While they may not always be recognised as AI, these technologies form an increasingly important part of the digital environment in which Erasmus+ and ESC programmes operate. These guidelines are therefore intended to cover both generative and non-generative AI applications, where relevant to programme implementation.

General principles for using AI

While AI technologies evolve rapidly, responsible use can be guided by enduring principles:

1. **Transparency**: Users and agencies should be able to explain, in general terms, how AI tools were used in preparing or assessing content.
2. **Proportionality**: The extent of oversight and risk assessment should match the potential impact of AI use - particularly where decisions affecting individuals or funding outcomes are concerned.
3. **Human oversight**: AI must not replace human judgement. It should assist, not automate, decisions of consequence.
4. **Accountability**: Users remain accountable for AI-assisted content. Responsibility cannot be shifted to the tool.

5. **Data protection and privacy**: Personal data must only be processed by AI systems in full compliance with applicable data protection rules.
6. **Respect for originality and rights**: AI-generated content should comply with intellectual property rules, and applicants should ensure the originality of proposals and reports
7. **Explainability:** Agencies and experts should aim to understand how an AI tool contributes to outcomes, especially where it informs evaluation or eligibility decisions. Even if the technical workings are complex, the rationale for its use and output should be explainable.

In the following paragraphs we'll discuss the application of these principles in practice.

Benefits

The use of AI in the Erasmus+ and European Solidarity Corps programmes offers significant potential to improve efficiency, accessibility, and the overall quality of programme delivery. When applied responsibly and with appropriate oversight, AI can support both applicants and National Agencies in navigating complex workflows, enhancing decision-making, and reducing administrative burden.

AI can assist applicants and beneficiaries by helping to structure proposals, clarify compliance requirements, and improve the readability and coherence of submissions. This is particularly valuable for newcomers or smaller organisations, contributing to a more inclusive and equitable programme. AI tools may also offer prompts or guidance aligned with programme priorities, thereby increasing the quality and focus of applications.

In evaluation processes, AI can be used to summarise content, flag inconsistencies, and identify generic or potentially duplicated material. This can help reviewers and National Agencies apply standards more consistently while reducing the risk of error or bias. It may also support the early detection of anomalies or irregularities. However, human judgement remains essential, and AI should only serve as a supporting mechanism.

AI can improve how data is managed across the programme. By automating the collection, classification, and aggregation of information from applications, project reports, and research outputs, AI makes it easier to organise, retrieve and analyse large volumes of data. This can strengthen project monitoring and enable agencies to track milestones, identify delays, and assess the effectiveness of activities across multiple projects.

Beyond data processing, AI can play a role in analysing project outcomes and long-term trends. This supports better understanding of the programme's impact and can help inform strategic adjustments in future calls or guidance documents. By identifying recurring challenges or successful approaches, AI contributes to the continuous improvement of policy and programme design.

Communication and visibility activities may also benefit from the use of AI. By adapting messages to the needs of different stakeholder groups and optimising content delivery channels, AI can improve engagement and the dissemination of project results. These capabilities can enhance outreach to underrepresented groups and increase the overall visibility of the Erasmus+ and ESC programmes.

AI further supports accessibility by assisting with the creation, translation, and simplification of training materials and documentation. This facilitates clearer communication with beneficiaries and stakeholders across Europe, regardless of language or technical background

Finally, AI can support internal workflows, helping agencies and the Commission to streamline document drafting, summarise feedback, prepare responses, and anticipate future workload based on application trends. It may also assist organisations in identifying suitable project partners based on thematic or geographic alignment, strengthening cooperation and improving the quality of funded projects.

Risks

The use of AI in Erasmus+ and the ESC comes with risks that must be carefully managed.

While AI tools can help in brainstorming, drafting documents or finding information, they can also provide users with imprecise or incorrect information. Commonly referred to as AI hallucinations, AI tools can provide inaccurate or misleading information, including on the programmes and their features. Over-reliance on AI could lead to errors in evaluations or fraud detection, diminishing the role of human intuition and experience.

AI tools can also be biased. When used in assessment or decision-making processes, these biases could result in disadvantaging certain applicants or omitting important information in summaries or analyses.

Data privacy concerns arise when handling personal information, requiring strict personal data protection compliance. Additionally, AI may prioritise quantitative metrics over qualitative impact, potentially excluding innovative or socially valuable projects.

Ensuring fairness, inclusivity, and regulatory compliance through **responsible use and human oversight** is key to mitigating these risks.

To help assess the appropriate level of oversight for various AI use cases, see Annex 3, which provides a non-binding risk matrix tailored to National Agency workflows.

Risks to programme implementation and governance

Inaccuracies and biases

AI models are trained on very large amounts of data and are built to create responses that have the highest probability of matching users' prompts. This, in turn, makes it difficult for AI models to pinpoint the source(s) of data they used (textual or not) and often cannot provide users with the resources used to provide a specific response. When they do, they can provide inaccurate or even made-up responses – the phenomenon referred to as AI hallucinations. This is why it is difficult to assess the reliability of answers generated by AI using only AI tools.

With this risk in mind, actors active in the programme should always critically assess any response produced by a generative AI model for potential biases and factually inaccurate information. This can be achieved by cross-referencing AI-generated text with reliable and relevant information sources (such as reference programme documents).

Fairness

If AI models are used to evaluate, score, or filter applications, they might unintentionally favour certain types of projects, topics, or applicants based on patterns in the training data[4]. This can introduce or perpetuate biases, potentially disadvantaging specific demographics or regions and leading to unfair treatment of applications. More generally, AI tools can omit important or even essential information when analysing or summarising text, which can misrepresent the content or quality of an application or report if used in assessment.

While AI can be a valuable assistant, it must not be used without human oversight. It is imperative that people review and critically assess all AI-generated outputs rather than assuming their accuracy.

Transparency and accountability

Decisions made with AI involvement should be transparent to stakeholders. If the AI's decision-making process isn't clearly understood or explainable, applicants might question the fairness of the evaluation, and agencies might struggle to justify decisions. Transparency is essential for applicants to trust that the AI's role in decision-making is impartial and based on objective criteria.

The same applies for applicants who remain fully responsible for the proposals they submit.

Data privacy and security

Erasmus+ applications may contain sensitive personal data, including information about applicants, partner organisations, and participants. AI systems must handle this data in compliance with the relevant data protection regulations[5]. In addition to personal data covered

[4] The potential for bias in AI systems largely depends on the quality and diversity of the training data, as well as the design and implementation of their algorithms. If the training data reflects, for example, historical or societal biases, the AI may inadvertently reproduce or amplify them, which could lead to the unintentional favouring of certain projects, topics, or demographics.

[5] https://ec.europa.eu/erasmus-esc-personal-data

by the relevant data protection regulations, there may be other types of non-public data handled by national agencies (e.g. grant allocation tables) that also require careful consideration when using public AI tools. Data leaks, unintended exposure, or misuse of sensitive information could undermine the privacy of individuals and organisations involved. Using sensitive personal data in prompts and the upload of documents containing sensitive personal data to publicly available AI tools must be avoided.

National Agencies are encouraged to consult the Data Protection page on NAconnECt[6] for further information, including training materials, guidance documents, and recordings of relevant webinars on this topic.

Agencies should exercise caution when using any AI tool that processes content from applications or reports. In particular, personal or non-public institutional data must not be entered into public AI tools. Where possible, anonymisation[7] or the use of settings that prevent further data training should be applied. Agencies are encouraged to consult internal data protection officers or European Commission where appropriate.

Risks to the application process, project implementation and results

Quality of content and misrepresentation

Generative AI may be used to draft applications or generate content for dissemination purposes. While this can improve grammar, style or readability of text, there is a risk that AI-generated content could contain inaccuracies or misrepresentations if not properly verified. Poor-quality content could negatively affect the use of project results, their impact and the credibility of Erasmus+ and ESC projects.

Intellectual property and originality concerns

Intellectual property rights in generative AI models and tools have become a significant area of concern as these systems often draw on vast datasets that include creative works, text, images, and other intellectual property. AI models learn from this data to generate new content that may closely resemble original works or incorporate elements derived from them, raising questions around authorship, ownership, and fair use.

In Erasmus+ and ESC applications, originality of project ideas and content are relevant application elements. Using generative AI can blur the lines of originality, potentially risking plagiarism if the AI replicates elements from its training data. As of 2025, the Erasmus+ programme guide specifies[8] that, in the context of original content and authorship, applicants should be aware of the risk of plagiarism and use AI tools cautiously to ensure accuracy, comply with intellectual property regulations, and ensure that their application contains original content. The use of AI

[6] https://webgate.ec.europa.eu/fpfis/wikis/x/kaPTDw

[7] Anonymisation refers to the process of irreversibly altering personal data in such a way that the individual can no longer be identified directly or indirectly by any means reasonably likely to be used, either by the data controller or any other party. Common methods include data aggregation, generalisation, or suppression of identifying variables.

[8] Erasmus+ Programme Guide 2026 (version 2) page 433, paragraph “Original content and authorship”

may impact not only the originality of the applications but also the originality of the feedback provided to applicants by national agencies. Therefore, applicants should receive relevant and tailored feedback.

Risks to evaluation and decision-making

Overreliance on AI and insufficient human oversight

When it comes to the use of AI in assessment and decision-making, especially grant award decisions, rigorous oversight is crucial. While AI can support assessment processes, people must remain involved in review and critical decision making, especially where careful judgement and context are needed.

National agencies should design their evaluation processes to ensure bias mitigation, transparency, and data privacy compliance. Systems must incorporate bias detection to ensure fair outcomes, transparent reporting of decision criteria, and strict adherence to data privacy measures. For example, an AI tool ranking applicants based on predefined criteria must avoid disadvantaging specific groups and allow human intervention in case of questionable decisions.

When it comes to AI tools supporting content drafting, information summarisation, or language translation, AI can enhance administrative efficiency. However, human review remains necessary to ensure the content's relevance, accuracy, and consistency with programme objectives. For instance, an AI tool summarising project reports can streamline reviews, but a human should verify that critical nuances and key points are retained.

Knowledge on AI and skills gaps

Limits to "AI literacy" of the personnel involved in evaluation and decision-making can make it difficult to recognise irresponsible use of AI tools by applicants as well as to use AI responsibly to help with appropriate tasks. Regular training sessions for staff and stakeholders should be implemented to ensure they are proficient in using AI tools and interpreting their outputs.

When monitoring external AI developments, it is crucial to uphold the integrity and fairness of the Erasmus+ and ESC programmes. Stakeholders should remain aware of external influences, particularly the use of AI in drafting EU grant applications. Agencies should actively track these advancements to evaluate their potential impact on application quality, authenticity, and compliance with programme standards.

Principle of proportionality and risk awareness

National Agencies are encouraged to assess the potential impact of AI use based on the purpose and context. Low-risk use (e.g. language correction or document formatting) may require minimal oversight, while higher-risk tasks (e.g. eligibility screening or summary writing for assessment) demand greater scrutiny and documentation. This principle allows for flexible, context-sensitive use.

Guidelines for responsible AI use by agencies in their professional practice

These guidelines are structured around key functional areas in National Agency workflows and highlight responsible AI uses while reinforcing the need for appropriate oversight.

National agencies should adopt a risk-based approach, applying higher scrutiny to AI uses that influence decision-making, particularly in areas affecting applicants' rights or outcomes. Human oversight must remain central to all critical decisions to ensure accountability and uphold programme standards. While lower risk AI uses, such as administrative support, can enhance workflows, these should still be reviewed for accuracy and relevance.

By integrating these practices, agencies can harness the benefits of AI while adhering to programme rules and maintaining ethical standards, transparency, and the integrity of the Erasmus+ and ESC programmes. Below are key recommendations.

AI-assisted eligibility checks

- Automating document verification: use AI to validate documents such as legal and financial certificates, provided they don't contain sensitive or personal data. This can streamline the process by cross-checking against predefined criteria, reducing administrative workload.
- Flagging incomplete or inconsistent submissions: AI tools can identify missing data or inconsistencies, such as mismatched dates, which can then be reviewed by humans.

Bias mitigation in AI tools

- Monitoring for bias: ensure AI tools used for initial screening or ranking are thoroughly tested for bias, to the extent possible. They should not systematically exclude or unduly disadvantage particular regions, organisations or demographic groups.[9]
- Human review of flagged content: any applications flagged by AI for potential issues should undergo a human review to avoid errors or unfair exclusions.

Data privacy and compliance

- Securing sensitive data: ensure all data processed by AI tools complies with relevant data protection regulations. Wherever possible, use anonymised data during evaluations.
- Maintaining audit trails: keep detailed logs of how AI tools are used in the evaluation process, including the criteria applied and any decisions flagged for human intervention.

In applying the principles above, agencies are not expected to adopt fixed technical protocols. Instead, they should integrate these considerations into their evolving practices, drawing on

[9] However, prioritisation of specific regions, organisations or demographic groups remains justified where it concerns programme priorities and the inclusion of participants and groups with fewer opportunities.

guidance issued at European level. These references can help frame internal discussions, training, and ethical reflection as the landscape matures.

“To encourage consistent practices and work towards simplification, the Commission will explore opportunities for shared tools and workflows that support common administrative tasks (e.g. eligibility checks, OID validation, multiple submission, detection of fraud) while ensuring data protection and legal compliance.”

When to avoid AI use?

Avoid using AI tools in these cases:

- To process or evaluate sensitive personal data without explicit safeguards.
- As the sole basis for eligibility or scoring decisions.
- When transparency of the AI output cannot be ensured.

Environmental considerations in AI use

AI tools vary widely in their energy consumption and environmental impact. Large generative models - used for creating text, images, or video - can be particularly resource-intensive, especially when used frequently or for tasks that could be addressed with simpler solutions. As the use of AI becomes more common in programme management and administration, it is important to consider sustainability alongside effectiveness.

When using AI in their professional activities, National Agencies staff are encouraged to adopt a mindful and purpose-driven approach. Lightweight, task-specific tools - such as those for language correction, summarisation, or document formatting - are generally more efficient and appropriate for routine use. In contrast, high-demand AI systems should be reserved for cases where their added value clearly justifies the environmental cost.

Raising awareness of these differences helps ensure that AI is used in a responsible and proportionate way. National Agencies may also wish to promote digital sustainability in their communication with applicants and beneficiaries - for instance, by encouraging the responsible use of AI in project implementation, reporting, and dissemination activities.

By making informed choices about how and when AI is used, National Agencies staff contribute to the broader goals of digital responsibility and environmental sustainability, in line with the values underpinning Erasmus+ and the European Solidarity Corps.

Guidelines regarding the assessment of Erasmus+ applications, project reports and outputs with the use of AI

One of the main challenges to the programmes is the growing trend of the use of AI tools to draft applications, project reports and outputs.

It is important to highlight that AI use is not an issue in and of itself. However, applicants remain fully responsible for the accuracy and originality of their submissions.

Applicants may use generative AI tools when preparing proposals in relation to both the structure of the proposal and its substance (e.g. language review, development of narratives from a set of ideas, search for background information).[10] Issues arise when applicants or beneficiaries fail to use AI tools responsibly, leading to poor quality, inconsistencies, providing incorrect information or plagiarism.

In other words, as a rule, the use of generative AI tools in drafting proposals, progress reports and final reports **may not be considered by expert evaluators as a reason to penalise a proposal**. However, where experts detect that the use of AI tools has led to inaccurate or erroneous data, plagiarised information, or otherwise negatively impacted the quality of the application in reference to programme criteria, they must identify this as a shortcoming and lower the score, in accordance with the call evaluation procedure.[11]

As with any text entirely drafted by humans, evaluators should assess whether the content provided is accurate, consistent, specific to the application or project, and not plagiarised. At application stage, they should assess whether applicants respect the principle of original content and authorship (see Part C of the Programme guide)**.** The considerations outlined below can help agencies in screening for problematic AI use.

Besides, expert evaluators are responsible for any use of generative AI tools, which also entails keeping the confidentiality of the proposal information and ensuring its adequate protection and adopting appropriate measures to ensure the protection of personal data. Evaluators should also be aware of the risk of breaching confidentiality obligations and should avoid over-reliance on AI tools while acknowledging its potential limitations (such a hallucinations and biases)

Recognising and dealing with AI-generated content

- **Identify AI indicators**: if there are signs of AI-generated content, such as generic language, specific stylistic patterns, repetitive phrasing, or a lack of specific context, consider the detected issues in the context of relevant award criteria.

[10] Adapted from the DG RTD guidance note on the use of artificial intelligence tools in the submission and evaluation of HE proposals.
[11] As above.

- **Use of AI-detection tools**: using AI-detection tools carries some risk, as their results are not always definitive and are increasingly less reliable as AI develops. It's best to avoid using them or consider their findings as just one part of a more comprehensive review process.
- **Spot-check inconsistencies:** look for stylistic inconsistencies, abrupt shifts in tone, or contextless data. These can indicate where AI-generated content might have been inserted without adequate editing or review, and when additional scrutiny is needed.
- **Assess originality in applications**: evaluate whether the content, especially in sections that require originality, such as project objectives or descriptions, genuinely reflects the applicant's ideas or if it appears overly generic.
- **Local context:** assess how the application refers to local/national realities and how the programmes can be of use there.
- **Check for completeness and accuracy**: cross-reference information, when possible, to confirm accuracy. Apply the relevant assessment criteria and guidelines and verify the accuracy of responses to questions regarding organization or consortium presentation, profile and experience in the context of assessing its operational capacity.
- **Document observations on AI use**: in assessment internal notes (experts' and NAs'), record any significant AI influence detected, particularly if it impacts the proposal's quality or compliance with Erasmus+ and ESC standards.

Final review and recommendations

- **Ensure human oversight**: before finalising any task where AI has significantly contributed to content, ensure that human judgement is prioritised, especially in areas like assessment and eligibility decisions.
- **Provide feedback**: if you have reasons to believe an application, report or output shows excessive reliance on AI tools, consider providing feedback to help applicants improve transparency and authenticity in future submissions. Instead of focusing on possible use of AI, provide concrete feedback on where the text was lacking in reference to specific assessment criteria.

Support from the European Commission

The European Commission with the help of the Salto Digital will provide staff and external evaluators with training on AI literacy, risks, data protection, and alignment with programme guide criteria.

The Commission will also rely on existing networks, such as the Digital Contact Points or the IT Working Group, etc to share information and user cases to disseminate good practice among agencies via a Team channel or any other appropriate platform.

Frequently asked questions

What types of AI-generated content are acceptable in Erasmus+ and ESC applications and project reports?

AI-generated content is acceptable in Erasmus+ and ESC applications and reports when it supports tasks like drafting, content summarisation, data visualisation, or media creation. However, in line with the programme guide provisions, content generated by AI must be reviewed by the applicant to ensure relevance, accuracy, and adherence to programme guidelines.

What is the European Commission's policy on the use of AI?

The European Commission promotes the responsible and ethical use of AI, emphasising transparency, fairness and compliance with data protection laws, as outlined in the AI Act.[12] This regulation supports the role of AI in boosting innovation while safeguarding individuals' rights. AI use should align with programme objectives, and beneficiaries are allowed to use it in ways that complement human input without fully replacing it. The European Commission continues to develop solutions to balance the potential of AI with ethical considerations.

How can AI be integrated into the professional practices of national agencies?

AI can support various aspects of NAs' work, from administrative efficiencies to content creation and summarisation. For instance, AI tools could assist in drafting documents, helping in assessment procedures, generating visual content for programme visibility, and processing information. It is crucial, however, that agencies integrate AI with proper oversight and risk assessment, following the relevant regulation on transparency, bias mitigation, and data protection to ensure responsible use.

Can AI be used by National Agency staff to help assessing applications or final reports?

Yes, AI can assist staff in project assessment, such as by summarising large amounts of data or identifying patterns in applications. However, due to potential biases and limitations, AI outputs should not replace human judgment, particularly in high-risk decisions like grant allocations. Human oversight is critical to validate AI findings and ensure fair, transparent, and accountable evaluations.

What are the challenges of using AI to support equity in access to Erasmus+ opportunities?

One challenge is ensuring that AI systems do not unintentionally amplify biases, which could impact equitable access to opportunities. Ensuring diverse and representative training data, along with regular audits, helps mitigate this risk.

[12] https://digital-strategy.ec.europa.eu/en/policies/regulatory-framework-ai

How can AI misuse be detected in application or reporting stages and how can it be handled?

Use of AI as such is not an issue if requirements laid out in the programme guides are respected. Characteristics of AI-generated text can include inconsistencies, generic phrasing or specific stylistic patterns. Notice that the same issues are present in poorly drafted text produced by humans. Therefore, agencies should use the existing programme criteria to assess whether applications and reports are comprehensible, logical, substantiated, and specific to the satisfactory degree.

Are there any specific software programmes that can be used to detect AI-generated applications?

Yes, a number of AI-detection tools can analyse text for patterns typically found in AI-generated content. However, these tools have significant limitations, and their accuracy is not always reliable. Advances in generative AI, along with the ability to craft queries in ways that minimise detection, can significantly reduce their effectiveness or even render their results completely inaccurate. Given these challenges, if used, agencies should consider AI-detection tools as just one component of a broader verification process, rather than relying on them as a definitive measure of authenticity. This is especially important given that the use of AI is not grounds for rejection.

What can an agency do if it suspects an entire application or report, or a significant part of it, was generated by AI?

Employing AI to draft an application or report is not inherently problematic. However, if an agency suspects that AI has generated significant portions or even the entirety of the text, they should consider the reasons behind that suspicion. Often issues such as lack of substance or specificity are not due to the use of AI itself, but rather because the application or report fails to meet the established award or other programme criteria. Consequently, content should be evaluated solely on its quality and relevance, rather than on whether AI was involved in its creation.

What can an agency do if it suspects plagiarism or an AI-generated application?

If plagiarism resulting from the use of AI tools is suspected, the agency must take appropriate measures in accordance with the applicable provisions of the Erasmus+ programme. A formal investigation should be conducted to verify the originality and authenticity of the application, relying on thorough manual review and cross-referencing to identify potential violations. The applicant must provide clear explanations or evidence regarding the sections in question, including any use of AI tools. Violations of originality requirements will result in appropriate sanctions, in accordance with the programme rules.

How does the use of AI in drafting Erasmus+ and ESC applications align with data protection regulations?

The use of AI in Erasmus+ and ESC applications must comply with relevant data protection regulations, especially since personal data is often involved. Applicants should use AI tools that handle data responsibly, ideally selecting options that are data protection compliant. Avoid sharing sensitive or personally identifiable information with AI tools and ensure that any data used complies with privacy laws, maintaining strict access controls for any AI-generated data.

Can AI be used to enhance the visibility and dissemination of project results, and what are best practices for doing so responsibly?

Yes, AI can be valuable in creating content for project visibility, including social media posts, reports, graphics, and multimedia materials. It is important to have a human review of all AI-generated content to verify that messaging is aligned with programme rules and values as well as project objectives.

If AI tools are used for language translation in project materials, what steps should be taken to ensure quality and accuracy?

When using AI for language translation, applicants should first choose tools known for high-quality translations. It's important to have translations reviewed by a native speaker or language expert to catch inaccuracies and cultural nuances that AI may overlook. Critical project content, such as objectives, outcomes, and participant guidelines, should always undergo a human review to ensure clarity and alignment with Erasmus+ standards.

What are "AI hallucinations" and how can applicants and evaluators guard against this issue in project-related content?

"AI hallucinations" happen when an AI model produces false or invented information that sounds plausible. To guard against it, applicants should cross-check AI-generated text with reliable sources to verify accuracy. Agencies should remain alert to overly generic or factually dubious content and, if necessary, request additional information from applicants to confirm content validity. Human oversight is crucial to catch and correct AI hallucinations.

What role should AI play in project evaluation versus human evaluators, particularly in scoring applications?

AI can support project evaluation by assisting with data summarisation or helping organise large volumes of application data. However, scoring, and final assessments should remain in the hands of human evaluators, as they are better equipped to consider context, interpret nuanced responses, and make ethical judgments. AI can provide insights but should serve as a complementary tool, with humans retaining full responsibility for critical evaluation decisions.

What ethical considerations should be prioritised when using AI in grant management?

Ethical considerations include ensuring transparency in AI decision-making processes, safeguarding beneficiary rights, promoting inclusivity, and establishing accountability mechanisms for AI's impact on grant management.

What is considered responsible AI use in Erasmus+ reports or final deliverables?

AI tools may be used to assist in drafting reports, generating content, or improving structure and language. However, the use of AI must be transparent, and the final output must remain the responsibility of the applicant or beneficiary. Responsible AI use means that content is relevant, factually accurate, specific to the project, and free from plagiarism or misrepresentation. Where AI is used, it should support and structure the narrative, not replace human judgement or originality.

Can National Agencies or external experts use AI to assist with drafting feedback?

Yes, AI tools can be used to support the drafting of comments or feedback, for instance by summarising parts of an application or improving clarity of language. However, human review is essential to ensure that the feedback is accurate, meaningful, and tailored to the application in question. Feedback generated with the help of AI should reflect the expert’s or NA’s assessment and not be generic, overly templated, or disconnected from the specific evaluation criteria.

Is there a list of recommended AI tools?

There is currently no official list of approved or recommended AI tools for use in Erasmus+ or ESC programme management.

ANNEX 1: Examples of use cases or good practices for responsible AI use by agencies in their professional practice:

The examples below illustrate how AI can be responsibly used by National Agencies (NAs) to support administrative, analytical, and communication-related tasks, provided that human oversight is maintained and data protection obligations are respected.

- Eligibility and compliance checks:
    - Automated document validation: AI can assist in verifying whether uploaded legal or financial documents meet basic eligibility criteria (e.g. checking for missing signatures, required fields, or expired dates).
    - OID validation: Use of AI to cross-reference information submitted in OID requests with public databases or structured formats (e.g. legal entity registers), helping flag inconsistencies or missing data.
- Content summarisation and report handling:
    - AI-assisted summarisation: Use of AI tools to summarise large volumes of information (e.g. final reports, project deliverables) to support human reviewers in understanding key findings more efficiently.
    - Trend analysis: AI can support the identification of recurring themes, common challenges, or emerging needs based on aggregated data from submitted reports or evaluations.
- Supporting feedback drafting
    - Initial feedback support: AI may assist in formulating draft comments based on scoring or standardised criteria, provided these are carefully reviewed and adapted by human evaluators.
    - Language refinement: AI-powered tools may be used to enhance clarity or consistency of outgoing messages or feedback, ensuring they remain appropriate and personalised.
- Communication and outreach
    - Translation support: AI-based translation tools may help create multilingual versions of materials for outreach or beneficiary communication. Critical content should be reviewed by native speakers or staff familiar with programme terminology.
    - Promotional content generation: With careful oversight, AI may support drafting of newsletters, summaries, or social media content to increase visibility of programme results—while respecting copyright and public image guidelines.
- Internal process optimization

- Meeting transcription and summarisation: AI may be used to transcribe internal or stakeholder meetings and produce summaries or action point lists, supporting documentation and coordination.
- Workflow automation: AI may assist in automating low-risk, repetitive tasks (e.g. tracking deadlines, sorting documents, categorising incoming queries), allowing staff to focus on more strategic work.

- Risk monitoring and bias detection
  - Plagiarism checks: AI tools can support the detection of suspected duplicate or overly similar application content, though results must be interpreted with caution.
  - Bias detection: Experimental use of AI tools to identify potential patterns of unintentional bias in assessments or application outcomes (e.g. regional imbalance), requiring careful human interpretation.

- Internal resource management
  - Document search and retrieval: AI may support internal knowledge management by making it easier to locate past evaluations, guidance, or templates using natural language queries.
  - Training needs identification: Analysing staff queries or internal documents to detect gaps in knowledge or recurring needs, helping to shape training priorities.

ANNEX 2: Examples of user cases or good tips regarding the assessment of Erasmus+ applications, project reports and outputs with the use of AI:

These examples illustrate how AI can support different stages of assessment, from initial analysis to evaluator guidance, always under the condition that human oversight remains central, and programme rules are followed. AI should assist rather than replace human judgement, especially where decisions affect funding or eligibility.

1. Assessment of project reports
   - Some agencies have explored using AI to generate preliminary analyses of project reports, flagging inconsistencies or missing information before expert evaluation begins.
   - Good tip: Human evaluators should always confirm or correct AI findings, ensuring that assessments remain nuanced and aligned with the quality of the submission.

2. Guidelines or checklists for experts
   - Clear internal guidance - such as checklists or examples - can help evaluators determine:
     - When content appears overly generic or lacks specificity
     - What constitutes responsible use of AI by applicants
     - How to address AI-influenced content in internal notes, without penalising proper use
   - Good tip: Experts should use principle-based criteria rather than detection tools alone.

3. Structured assessment workflows
   - Agencies may integrate AI into workflows by using it to:
     - Summarise key sections of applications or reports
     - Flag gaps or inconsistencies prior to human review
     - Assist in drafting preliminary notes for evaluators
   - Good tip: All outputs from AI must be reviewed and validated by humans. The source and purpose of any AI-generated content should be clear in internal documentation.

4. Feedback to applicants
   - AI can help structure feedback to ensure clarity and consistency, but final messages must reflect the human evaluator's judgement.
   - Good tip: Avoid generic or templated feedback that could raise concerns about fairness. Feedback should be tailored to the specific application and aligned with the scoring rationale.

5. Handling suspected misuse or low-quality AI content
   - Evaluators may encounter content that appears AI-generated, lacks depth, or misrepresents the project. These may include:
     - Vague or repetitive language
     - Lack of context-specific references

    - Inconsistencies or gaps in logic
- Good tip: Document such issues factually, referring to the impact on quality and evaluation criteria - not the suspected use of AI alone. If necessary, escalate through existing NA procedures.

6. Process transparency and record-keeping
    - If AI is used in any part of the assessment process by NA staff, it is recommended to:
        - Record the purpose and scope of its use
        - Note how outputs were reviewed and validated
        - Store information in a way that supports transparency and potential audits
    - Good tip: Treat AI as a supporting tool - its use should be transparent, non-decisive, and fully subject to human confirmation.

ANNEX 3 - illustrative risk matrix for AI use in national agency workflows

Risk level	Typical use cases	Expected oversight and safeguards
Low risk	• Spelling and grammar correction • Formatting and layout assistance • AI-based email drafting for internal communication • Translation of non-sensitive, non-final materials	Minimal oversight needed. Ensure compliance with standard data protection practices. No impact on decisions or programme quality.
Medium risk	• Summarising application or report content for internal use • Drafting preliminary feedback • Flagging missing or inconsistent fields in applications • Translation of application text or public outputs	Human review and validation required. Outputs must be checked for accuracy, relevance, and bias. Avoid sharing sensitive or personal data with non-compliant tools.
High risk	• AI-supported ranking or scoring of application • Automated eligibility screening • Use of AI to generate assessment reports without human confirmation • Use of AI on documents containing sensitive or personal data	Strict oversight necessary. AI must not make final decisions. Maintain documentation of usage. Ensure data protection-compliant tools are used.

Important note:

This matrix provides an indicative categorisation of risk levels associated with the use of AI in Erasmus+ and ESC workflows from an operational, ethical, and programme integrity perspective.

It does not correspond to the legal risk classification of AI systems under the AI Act (i.e. minimal, limited, high, or prohibited risk categories as defined in the regulation). Instead, it is intended to help National Agencies apply the principle of proportionality when introducing or evaluating AI-supported processes.

Agencies should use this matrix as a reflection tool to assess where greater human oversight, documentation, or caution may be appropriate. It is not binding and should be adapted to each NA's context and practices.