



HAHE Policy on the Use of Artificial Intelligence in the Accreditation Process

(July 2026)

1. Purpose

This policy establishes the principles and rules governing the responsible use of Artificial Intelligence (AI)¹ in the HAHE Accreditation process. It ensures that any application of AI upholds the integrity, transparency, and trustworthiness of the external evaluation and Accreditation process.

AI may be used as a supportive tool but cannot replace human judgement, independence, or accountability. All parties must uphold the HAHE Guidelines for Accreditation, as well as other related guidelines, such as the HAHE Code of Ethics, which support impartiality, transparency, and trustworthiness of the external evaluation and accreditation process.

2. Scope

This policy applies to:

- Institutions under review submitting accreditation proposals
- External Evaluation & Accreditation Panel (EEAP) members engaged in the accreditation process
- HAHE review coordinators and staff
- HAHE Evaluation and Accreditation Council (EAC)

3. Principles for AI Use

The following principles for the use of AI tools apply:

- Human Oversight:** AI can support or enhance human work. However, the final responsibility for the outputs, the decisions and the approval of reports lies with the relevant people and bodies.
- Transparency:** The Use of AI in drafting Accreditation Proposals or Accreditation Reports should be disclosed. Outputs from AI tools should be identified and reviewed.
- Accountability:** Users of AI are accountable for the outputs generated by these tools and must ensure responsible application and accuracy of the work.
- Integrity:** AI use must not compromise authenticity of evidence, accuracy of analysis, or independence of reviews and outcomes, or any other decision-making.

¹ Artificial Intelligence is the simulation of human intelligence by machines, enabling them to learn, reason, and make decisions (source: ChatGPT).

e. Data Protection, Privacy and compliance with the regulatory framework: All AI applications must comply with the General Data Protection Regulation (GDPR)² and the National Data Protection Law³. Furthermore, all AI applications should take into consideration the EU regulation 2024/1689⁴ laying down harmonised rules on Artificial Intelligence (AI ACT).

f. Bias Mitigation: AI tools must be used with awareness of potential algorithmic bias and production of inaccurate information (hallucinations).

4. Requirements for Institutions Under Review

Institutions may use AI to support preparation of accreditation proposals or other accreditation related documents, but:

- They remain responsible for the final submitted documents.
- They must disclose the extent and purpose of AI use.
- AI-generated text or data must be verified by Institution staff for accuracy and authenticity.
- AI must not be used to simulate stakeholder input.
- They must ensure compliance with the General Data Protection Regulation (GDPR) and the national legislation on data protection rules when using AI.

5. Requirements for External Evaluation & Accreditation Panel (EEAP) Members

AI may be used to assist in document and information review, drafting, or language refinement, but EEAP members must:

- Disclose AI use in the Accreditation Report.
- Ensure all analysis, judgements, and recommendations reflect independent expert judgement and EEAP consensus.
- Abstain from using AI for confidential interview notes, deliberations, or decision-making.
- Remain responsible for the final documents submitted to the HAHE.

Drafting of Accreditation Reports must remain human-led. AI must not be used to generate EEAP judgements on standards or simulate consensus.

6. Requirements for HAHE Review Coordinators

The HAHE review coordinators may use AI for administrative or logistical purposes (e.g., preparation of practical information sheets for site visits) provided confidentiality/data protection is maintained.

² Regulation (EU) 2016/679

³ Law 4624/2019

⁴ <https://eur-lex.europa.eu/eli/reg/2024/1689/oj/eng>

7. Requirements for the HAHE Evaluation and Accreditation Council

The members of the HAHE Evaluation and Accreditation Council (EAC) may use AI to support document management and organization, information retrieval, and the search for or identification of specific evidence within the Accreditation Report. Such use is subject to the inviolable condition that AI tools shall not be employed, directly or indirectly, to lead to conclusions regarding the degree of compliance of the academic entity under review with the requirements of the Standards.

8. Ethical and Data Protection Considerations

No confidential or personal data related to the HAHE, the academic unit under review, the external evaluation and accreditation process, or individuals may be entered into AI tools without explicit safeguards.

9. Analysis of Accreditation Reports

The HAHE may use AI tools for facilitating the analysis of finalized and published accreditation reports and drawing general conclusions (thematic analysis) on the state of the Higher Education in Greece.

10. Disclosure and Reporting

All parties must disclose AI use in the accreditation process (e.g. in Accreditation Proposals or in EEAP Accreditation Reports) in the following manner:

Disclosure of AI Use

Artificial Intelligence (AI) tool ([add which one]) was used to support certain aspects of the preparation of this document. Specifically, AI was applied to assist with the following tasks: [list all tasks, such as drafting, language refinement, formatting]. All content was subsequently verified by the responsible parties ([add which one(s)]) to ensure accuracy, objectivity, and compliance with the HAHE Policy on the Use of Artificial Intelligence in the Accreditation Process (available [here](#)). The use of AI did not replace human oversight or decision-making at any stage of the process.

HAHE reserves the right to request clarification on AI use from any party.

11. Monitoring and Compliance

The HAHE will monitor and update the policy on a regular basis, in line with developments in AI technology, in national and European regulatory frameworks, and in higher education quality assurance.

Breaches of this policy may affect the validity of the accreditation outcomes.