


ERGO NETWORK AI USE AND COMPLIANCE POLICY

Introduction

At ERGO Network, we are committed to promoting a responsible, transparent, and rights-based approach to artificial intelligence (AI). We recognise the growing impact of AI on society, including the potential risks and benefits for civil society and Roma communities. This policy outlines ERGO Network's internal rules for the safe and ethical use of AI tools in compliance with the European Union's AI Act.

This policy complements other ERGO Network governance documents, in particular our Diversity and Inclusion Policy, Safeguarding Policy, and Staff Working Regulations.

The policy applies to all ERGO Network staff, consultants, volunteers, and members who use AI tools in any aspect of our work—whether in internal operations, communications, research, or events.

 This policy ensures that our use of AI tools supports our mission, protects the rights of Roma and other communities, and complies with legal and ethical standards

Scope and Definitions

This policy applies to all staff, consultants, volunteers, and members of ERGO Network who use artificial intelligence (AI) systems or tools in any part of their work. It covers internal operations, communications, research, advocacy, and event organisation.

For the purpose of this policy:


- **Artificial Intelligence (AI) system** means a *machine-based system that is designed to operate with varying levels of autonomy and may exhibit adaptiveness after deployment, and that, for explicit or implicit objectives, infers from input data how to generate outputs such as predictions, content, recommendations, or decisions that can influence physical or virtual environments* (AI Act, Article 3).
- **Limited-risk AI systems** are AI systems that interact directly with people and are subject to transparency obligations under the EU AI Act (Article 50). Examples include text or image generators, chatbots, auto-captioning tools, or translation software.



- **High-risk AI systems** are those used in areas with potential significant impact on health, safety, or fundamental rights (AI Act, Articles 6 and 7). ERGO Network does not develop or deploy such systems unless full compliance with all legal obligations can be guaranteed.
- **Prohibited AI systems**—as defined by the AI Act (Article 5)—such as those involving subliminal manipulation, social scoring, or real-time biometric identification in public spaces, are strictly banned within ERGO Network.

This policy primarily concerns the use of *limited-risk AI systems* for everyday organisational purposes. The use of any other type of AI system must be pre-approved by the ERGO Network AI Focal Point and Director.

Principles

- **Human-centric and rights-based**
All AI use at ERGO Network must uphold human dignity, fundamental rights, and the values of inclusion, equality, and empowerment—especially for Roma and other marginalised groups.
- **Not replacing human judgment**
Our ethical commitment is to use AI tools only as support, never as a substitute for human judgment, especially in areas linked to Roma rights, community work, grassroots work, and representation.
- **Transparency**
We commit to using AI systems in an open and understandable way,  clearly communicating when and how AI tools are applied. For example, the website contains an explanation and disclaimer of how AI is used, and the report contains a disclaimer on the use of AI if relevant.
- **Non-discrimination**
We prohibit the use of AI systems that reproduce or reinforce bias—especially antigypsyism, racism, sexism, ableism, or other forms of discrimination.
- **Safety and reliability**
We will only use AI tools deemed safe, secure, and compliant with EU and international standards, and we will assess risks before adoption.
- **Digital inclusion**
We will ensure that the use of AI does not exclude or harm Roma communities or other groups experiencing digital or social marginalisation.



Use of AI at ERGO Network

Permitted uses

AI tools may be used for:

- Drafting or translating texts (e.g. reports, emails, social media)
- Transcribing or summarising meeting notes
- Supporting research and data analysis
- Managing events (e.g. registration, polls)
- Streamlining administrative tasks

Prohibited uses

AI tools may not be used for:

- Surveillance or profiling of individuals
- Decision-making that affects rights or access to services
- Processing sensitive personal data (e.g. ethnicity, health) without safeguards
- Replacing human decision-making in safeguarding, recruitment, or complaints

Both lists are not exhaustive.

Preferred tools

We try to use AI tools that respect privacy and ethics, and we favour open-source or EU-based ones when possible.

Still, sometimes commercial tools like ChatGPT are the most practical for our work. In those cases, we assess the risks, agree on safe-use rules (for example, not entering sensitive data) and use them.

Risk management

Tool assessment

Before using any AI tool, users must consider:

- What the tool does and who made it
- Whether it processes personal data
- Any risks of discrimination or misinformation
- Whether its outputs will be verified by a human



High-risk systems

ERGO Network does not develop or deploy high-risk AI systems as defined by the EU AI Act unless fully compliant with all obligations.

Responsibilities of staff and partners

Awareness and training

All users of AI tools at ERGO Network will receive guidance and basic training on their responsible use, with a focus on human rights and inclusion.

Informed use

AI outputs (e.g. generated text) must always be reviewed by a person before being shared externally or used in decision-making.

Limits of automation

AI tools can support, but not replace, core human judgment—especially in work involving people, rights, and ethics.

AI in events and communication


Transparency in events

If AI is used (e.g. auto-captioning, chatbots), this will be clearly disclosed to participants in registration forms and during the event.

Inclusive design

We will ensure that AI-supported tools used in events are accessible and inclusive of participants with diverse needs.

Respectful representation

We will not use AI-generated images or messages that misrepresent  or other groups. Visuals and language must always reflect dignity and diversity.

Implementation and oversight

Oversight

The ERGO Network Director is responsible for implementing this policy, with support from the Communications and Campaigns Manager as the AI Focal Point.

Review and feedback

The policy will be reviewed annually and updated as needed based on changes in law, technology, or feedback from the ERGO Network team and its members.



Concerns and complaints

Misuse of AI tools can be reported confidentially through ERGO Network's safeguarding channels.

Accountability and monitoring

All users of AI tools at ERGO Network are individually responsible for ensuring that their use of AI complies with this policy and with ERGO Network's values of transparency, inclusion, and respect for human rights, as well as our Safeguarding Policy and other internal policies.

The **AI Focal Point** is responsible for:

- Maintaining oversight of AI use within the organisation;
- Reviewing proposed new tools for ethical, legal, and data protection compliance;
- Advising staff on responsible and inclusive AI use;
- Coordinating with the Director in case of misuse, data breaches, or risks to rights.

To ensure responsible use:

- ERGO Network may **periodically review AI activity** (e.g. tool logs, shared content, or outputs) to ensure that organisational, privacy, and ethical standards are upheld.
- These reviews will be **proportionate and transparent**, never intrusive, and always aimed at improving practice and compliance—not at surveillance.
- Staff are expected to verify and take responsibility for the **accuracy and integrity of AI-generated content** they use or publish.


If misuse or a breach of this policy is identified, ERGO Network may:

- Suspend or restrict access to specific AI tools;
- Request corrections or retractions of non-compliant outputs;
- In serious cases, apply the procedures outlined in the **Staff Working Regulations** or relevant contractual terms.

This monitoring process helps ensure that AI supports ERGO Network's mission safely and ethically while protecting both staff and the organisation from legal and reputational risk.

Collaboration and advocacy

Shared standards

ERGO Network will engage  AI tools and partners that respect our values and the rights



of marginalised communities, or those which do not contradict those and still provide value to our work and mission.

Roma voice in AI governance

We commit to contributing to civil society dialogue on AI governance, ensuring that Roma and other marginalised communities are heard and protected.

Acknowledgement

We recognise that AI tools are new for many staff. ERGO Network will provide support, training, and space for questions to ensure everyone feels confident and informed in their use.

The signee agrees to follow the procedures and values outlined in this policy for the duration of their relationship with ERGO Network.

Name (printed): _____

Date: / 20____

Signature: _____

