ECB AI policy

Practical guidance for ECB colleagues using AI

Summary

Use Copilot to help you work efficiently, not to replace your judgement.

Check what it produces and use the information generated appropriately.

You will remain accountable for the final work.

Five rules

Rule	What this means
1. You own the final output	Review, sense-check and edit anything Copilot produces before you use or share it.
2. Check the evidence	Verify facts, figures, names, dates, references and any legal, policy or technical points.
3. Use information appropriately	Only use information you are authorised to access and need for your work.
4. Be accountable for the decision	Copilot can support analysis and drafting but must not make decisions that require judgement or approval.
5. Be transparent about (significant) use	Where Copilot has materially shaped substantive Board, leadership, external or public-facing work, say so where appropriate.

Purpose and scope

1. We have arranged for all colleagues to have a Microsoft 365 Copilot Enterprise license and want everyone to use it confidently where it can save time, improve clarity or support better preparation. This policy sets out the sensible safeguards that apply.

2. The policy applies to all employees, contractors and temporary colleagues using Copilot through an ECB Microsoft 365 account. It sits alongside our existing requirements on data protection, information security, confidentiality, records management and delegated authority.

3. Copilot is an assistant. It does not replace professional expertise, accountability, established checks or approval routes.

What Copilot can help with

4. Copilot is built into Microsoft 365 applications such as Outlook, Teams, Word, Excel, PowerPoint, OneDrive and SharePoint. Depending on the application and your access, it can help you to:

   - draft emails, briefings, reports, policies and presentations;
   - summarise documents, meetings and email threads;
   - generate ideas, questions, options and first drafts;
   - identify themes or structure information;
   - improve tone, clarity and accessibility; and
   - prepare for meetings and routine tasks.

Remember

A useful or polished answer is not necessarily a correct answer.

Treat Copilot output as a draft until you have checked it.

Use of other Artificial Intelligence tools

5. Colleagues must only use AI tools that have been approved and provided by the ECB for business purposes (currently Microsoft 365 Copilot Enterprise).

6. The use of unauthorised public, consumer or third-party AI tools to process, analyse, store or generate work-related content is not allowed, unless expressly approved by the ECB. This includes tools such as Chat GPT and Claude. This restriction is designed to protect confidential information, personal data, regulatory information and the ECB's intellectual property, and to ensure compliance with legal, regulatory and security requirements.

7. Any unauthorised use of AI tools, or the sharing of ECB information with unapproved AI services, may be treated as a breach of this policy and could result in disciplinary action in accordance with the ECB's disciplinary procedures.

Using ECB information

8. Copilot Enterprise works within our Microsoft 365 environment and uses the access permissions already applied to your account. You may use ECB information where you are authorised to access it and where doing so is necessary for your work.

9. Permissions are not a substitute for judgement. The fact that Copilot can find or summarise something does not necessarily mean it should be used, copied into a new document or shared more widely.
    - Use only the information needed for the task.
    - Take particular care with personal, confidential, legally sensitive or restricted information.
    - Do not use Copilot to get around access controls or normal approval routes. Willfully attempting to do so may mean that the disciplinary policy is engaged.
    - If Copilot surfaces information which you did not expect to see, stop and report it straight away to the Director of Corporate Services.

Before you prompt, ask yourself:

- Am I allowed to use this information?
- Do I need it for this task?
- Is Copilot an appropriate way to handle it?

Use of AI assistants in meetings

10. AI-enabled meeting assistants, including Microsoft 365 Copilot, can be useful for producing transcripts, summaries, notes and actions. However, colleagues should consider whether their use is appropriate before enabling these features, taking account of the nature of the meeting, who is attending and the sensitivity of the information likely to be discussed. Particular care should be taken where a meeting involves confidential, legally privileged, sensitive personal or otherwise restricted information.

11. **For external meetings, colleagues should not assume that it is appropriate to use an AI meeting assistant simply because the functionality is available.** Where an ECB colleague proposes to enable transcription, recording or an AI assistant, attendees should be made aware beforehand or at the start of the meeting and any necessary agreement obtained. Colleagues should also exercise caution where an external participant wishes to introduce their own AI assistant or meeting bot. If there is any uncertainty about what information the tool will capture, where it will be stored, who will have access to it or how it may subsequently be used, the ECB colleague should ask for the assistant to be disabled or removed. For particularly sensitive meetings, the safest approach would be not to use an AI assistant at all.

Accuracy, judgement and approvals

12. Copilot can produce material that is inaccurate, incomplete, out of date, biased or misleading. It can also sound very confident when it is wrong. Every colleague using Copilot remains responsible for the quality and appropriateness of their work, and for ensuring appropriate transparency to enable the accountable person (Manager, Director, CEO, Board) to make informed decisions.
    - Check factual statements against reliable source material.
    - Check summaries against the original document, email or meeting record.
    - Test calculations and analysis, especially where they inform financial, operational or regulatory work.
    - Check that important context, contrary evidence and uncertainty have not been lost.
    - Make sure the output is balanced, proportionate and suitable for the audience.
    - Follow the usual review, sign-off and delegated authority arrangements.
13. Copilot may help to organise evidence or develop options, but it must not be used to make any decisions that require human judgement, accountability or approval – for example, to determine the outcome of a complaint, make a regulatory or employment decision, or approve expenditure or policy on behalf of the ECB.
14. Copilot is not trained to provide legal advice and is not an authoritative source of the law. Copilot cannot provide legal advice which is protected by legal and professional privilege, other than specific circumstances where it is used by a qualified lawyer advising in privileged circumstances.

Personal data and confidentiality

15. You may use Copilot when working with personal data **only where you already have lawful access to that information and the processing forms part of your duties**. Using Copilot does not change your obligations under data protection, confidentiality, information security or records management requirements. When using Copilot:
    - Only include the **minimum personal data** necessary for the task.
    - Do not use Copilot to access, analyse or infer information about individuals that you would not otherwise be permitted to access or process.
    - Take particular care when generating summaries, assessments, comparisons or recommendations relating to identifiable individuals. Outputs must be reviewed by a human and must not be relied upon without verification.
    - Check all outputs containing personal data for accuracy, relevance and appropriateness before using or sharing them.
    - Do not share outputs containing personal or confidential information with anyone who does not have a legitimate business need and authority to access that information.
    - Report any suspected personal data breach, inappropriate disclosure or security incident arising from Copilot use in accordance with the ECB's incident reporting procedures.
    - Where an output forms part of a business record, retain it in the appropriate SharePoint location in accordance with the ECB's records management and retention requirements.

For complaints casework

Copilot can support drafting and production of summaries and timelines etc, but the complaints team member must check the source material, apply the relevant framework and make the final judgement.

Fair and responsible use

16. Remember that AI-generated content can reflect gaps or bias in its source material. Use the same constructive challenge you would apply to any other evidence or advice.
    - Consider whose perspective may be missing.
    - Check whether the language or assumptions could lead to an unfair or discriminatory outcome.
    - Do not rely on Copilot to make any decisions which require human judgement, accountability or approval, or otherwise where the work could materially affect a person or organisation.
    - Do not present AI-generated material as verified evidence unless it has been checked against reliable sources, which should be evidenced.
    - Use respectful, professional prompts and outputs.

Transparency

17. We are transparent about our use of Copilot during our day-to-day working practices through having the following paragraphs in our privacy notice on the website – it is not necessary to refer to the use of AI in individual documents:

    Use of Artificial Intelligence (AI)

    We may use artificial intelligence (AI) tools to assist us in carrying out our functions, including the administration and handling of complaints, correspondence, enquiries and other business processes. AI tools may be used to help analyse information, identify relevant issues, summarise documents, draft communications and improve the efficiency and consistency of our services. Any use of AI is subject to appropriate human oversight and does not replace human decision-making. We remain responsible for decisions affecting individuals and take steps to ensure that personal data is processed lawfully, fairly and securely in accordance with UK data protection legislation.

    In relation to complaints handling, this may involve processing information contained in complaints, supporting evidence and correspondence to assist with tasks such as information review, summarising documents, drafting and case management. AI is used only as a support tool and all substantive decisions, conclusions and outcomes are reviewed and determined by appropriately authorised staff.

Uses that are <u>not</u> acceptable

18. Do not use Copilot to:

- make or present as final a decision that requires human judgement, accountability or approval;
- create misleading, deceptive, discriminatory, offensive or otherwise inappropriate material;
- access, infer or share information without proper authority;
- bypass ECB controls, delegated authority or established processes;
- generate content that would breach legal duties, confidentiality or ECB policy;
- make unsupported allegations or reach conclusions about an individual;
- use prompts or outputs in a way that could cause avoidable harm.

19. If a proposed use feels unusually sensitive, high-impact or difficult to explain, pause and speak to your line manager or the Director of Corporate Services before proceeding.

Use of AI agents

20. The ECB will be exploring the use of AI agents in due course, and this policy will be updated to reflect any additional points arising from use of AI agents.

Getting the best results (please also refer to the annex)

21. A good prompt explains the task, audience, context, format and limits. You will usually get a better result if you:

- say what you want Copilot to do and why;
- identify the intended audience and tone;
- point it to relevant source material that you are authorised to use;
- ask for a particular structure, such as a briefing, checklist, table or options appraisal;
- ask it to identify uncertainty, gaps or points requiring verification;
- refine the result through follow-up prompts;
- review and edit the final draft in your own words.

Support and reporting concerns

22. The Director of Corporate Services will arrange for colleagues to be provided with practical guidance, training and examples to support the rollout.

23. Contact the Director of Corporate Services if you have a question about safe use, data protection, information governance, permissions or an unexpected output - and remember to report any suspected data or security incident promptly.

Owner	Applies to	Effective from	Review point
Director of Corporate Services	All ECB colleagues	October 2026	Six months; then annually

Annex: prompts colleagues can adapt

These examples are starting points.

Add the relevant audience, source material and checks for your task.

Task type	Example prompt
Summarise a meeting	‘Summarise the key decisions, actions and unresolved points from this Teams meeting. Separate each action by owner and deadline. Flag anything that is unclear or not evidenced in the transcript.’
Improve an email	‘Rewrite this email so it is clear, concise and constructive. Keep the meaning unchanged and identify any statement that may need a factual check.’
Prepare a briefing	‘Create a one-page ECB briefing from this document. Use the headings: issue, context, evidence, risks, recommendation and next steps. Do not add facts that are not in the source.’
Review a policy	‘Review this draft policy for unclear wording, duplication, gaps, inconsistent responsibilities and points that may need legal, Board or leadership approval.’
Analyse a complaint	‘Organise the material under chronology, evidence, disputed points and questions for the complaints team member. Do not reach an outcome or infer facts that are not stated.’
Create slides	‘Turn this paper into a short leadership update with three key messages, decisions required, risks and speaking notes. Keep the tone concise and neutral.’