Code of Condut on the Use of Artificial Intelligence-Based Technologies in the Work of Faktograf – Association for the Informed Public

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Introduction

Faktograf – Association for the Informed Public (hereinafter: Faktograf) was founded with the aim of promoting, developing, and advancing professional and ethical journalism in the public sphere, fact-checking, and combating misinformation. It is dedicated to verifying the accuracy of claims made in the public space by digital media and social media users, ensuring the public's right to be informed about political, cultural, social, and civil society issues, and upholding the independence of journalism.

Faced with the rapid development of artificial intelligence (AI)-based technologies and their impact on organizations, media, journalism, and audiences, Faktograf has adopted this Code of Conduct on the Use of Artificial Intelligence-Based Technologies to ensure that the organization's technological development aligns with principles of good governance, transparency, professional ethical journalism standards, and an open relationship with the public.

This Code is based on:

- **Guidelines on the Responsible Use of Artificial Intelligence in Journalism**, adopted by the Council of Europe's Steering Committee on Media and Information Society (CDMSI) on November 30, 2023

- **The Paris Charter on AI and Journalism**, initiated by Reporters Without Borders and developed by 32 media professionals from 20 different countries

- **Poynter's Guide to the Ethical Use of AI in Newsrooms**

- **Faktograf's Code of Ethics**

- **Faktograf's Policy on Technical and Organizational Measures for Data Protection**

- **Faktograf's Policy on Authorization for Access to Personal Data**

In this Code, the term **artificial intelligence (AI)** is used in accordance with **Article 3 of the European Union's AI Act**, referring to a machine-based system designed to operate with varying levels of autonomy. After deployment, such a system can exhibit adaptability and, for explicit or implicit objectives, derive outputs—such as predictions, content, recommendations, or decisions—that may affect physical or virtual environments.

This Code is divided into three parts:

1. **General Ethical Principles for AI Use**
2. **Specific Principles for AI Use in the Editorial Work of Faktograf's Media**
3. **Specific Principles for AI Use in the Administrative and Technical Work of Faktograf**

The general ethical principles apply in full to all specific AI use cases.

General Ethical Principles for AI Use

Technology: Faktograf may participate in the development of AI technologies and tools beneficial for journalism and fact-checking, including providing manufacturers with data and know-how derived from newsroom work, with fair compensation. When selecting technology providers, Faktograf assesses the ethical integrity of the provider's business practices and compliance with European Union and Croatian legislation. Before deciding on the development or use of AI tools and technologies, Faktograf conducts a risk assessment of the collaboration and use of the technology, as well as a cost-benefit analysis. These evaluations must consider the data on which the AI system was trained, the measures taken to prevent bias, how and for what purposes Faktograf's data will be used for training, and ultimately, who will have access to the system and under what conditions. All existing technologies and tools will be tested before their adoption. Decisions on the development and use of technologies and tools are made by **the editors-in-chief for media and the executive director of the organization**. Faktograf will not use AI tools and technologies whose origins cannot be determined.

Data Security: To automate processes and reduce administrative burdens, Faktograf may use AI technologies and tools for data processing related to employee rights and organizational funding. Faktograf generally contracts **comprehensive administrative and technical solutions** to minimize the number of AI technology providers handling personal and organizational data.

Education: Faktograf organizes training sessions for employees on AI developments and trends in journalism and media, ensuring that all staff members have access to specialized training to enhance their AI skills. Additionally, Faktograf works to strengthen **public resilience against AI-generated misinformation** and conducts **educational initiatives on AI-related misinformation**.

Transparency: Faktograf and its media outlets **publicly disclose on their websites which AI technologies and tools they use** and for what purposes.

Human Oversight: All AI-generated content—whether journalistic or administrative—must be reviewed by the person who used the system before being shared. In journalistic work, an **editor must also verify AI-generated content**. Faktograf will not publish text, audio, or video content generated by AI tools **without human oversight**.

Environmental Impact: Faktograf acknowledges the **ecological footprint** of AI-based technologies and will use AI tools responsibly, considering their **energy and water consumption**. Employees and collaborators will be educated on the resource consumption of various AI tools.

Specific Principles for AI Use in the Editorial Work of Faktograf's Media

Journalistic work: For journalistic purposes, AI technologies and tools may be used for transcribing audio and video recordings, translation, proofreading, editing, summarization, and formatting texts, including creating headlines, subheadings, and keywords (tags). AI technologies and tools may also be used for research, processing large amounts of data, and searching for relevant content.

AI technologies and tools may assist in the process of fact-checking, but only as a supplementary tool, not for making final assessments of factual accuracy. Sensitive personal and other data that the editorial team handles during investigative work must not be entered into AI systems.

Recommendation System: Faktograf's media outlets may use an AI-powered automated system for recommending articles based on the keywords of individual articles. However, AI technologies must not be used to track reader behavior and generate personalized recommendations based on that data.

Communication with the Audience: Faktograf's media outlets, as well as their social media profiles, may use chatbots for summarizing and/or paraphrasing article content for readers, but only if the organization has participated in the development of such chatbots. This means Faktograf must be aware of the data on which the chatbots were trained and must have had a role in deciding which data will be used. The goal is to ensure that chatbots provide readers with only factually accurate and well-founded information.

Audiovisual Content: Faktograf's media outlets may use AI technologies and tools to create audiovisual content, provided that such content is clearly labeled as AI-generated, including information about the tool used. AI technologies and tools must not be used to edit authentic photographs, videos, or audio recordings in a way that alters their informational content or context.

Specific Principles for AI Use in the Administrative and Technical Work of Faktograf

Personal Data: Faktograf may use AI technologies and tools exclusively with personal data of employees and external collaborators that derive from employment contracts or copyright agreements, as well as data necessary for exercising employee rights in accordance with the Work Regulations. Faktograf will inform employees and/or external collaborators that AI technologies and tools process their personal data within the general contractual provisions on data processing.

Organizational Data: In accordance with international and European fact-checking codes, key organizational data of Faktograf are public, and therefore there is no obstacle to sharing such data with AI technology and tool systems for the purpose of work automation. This does not apply to the personal data of individuals authorized to represent the organization, for whom only publicly available data from the association register may be used.

Additionally, certain organizational data are not public, including information on individual salaries, fees, supplier expenses, contracts with third parties, project reports, contracts with NDA clauses, strategic and operational plans, and other internal organizational documents. Such data may be shared with AI systems only in an anonymized form or when using Faktograf's own locally hosted AI system with restricted access.

Work Automation: Work automation must comply with the aforementioned provisions on personal and organizational data. If AI technologies and tools used by Faktograf are externally leased and not hosted on its own local AI system, they may be used for:

- Preparing travel orders, work hour records, and other labor-intensive forms

- Creating transcripts and notes

- Conducting anonymized analytics and statistical evaluations of organizational processes

If work process automation leads to the elimination of a specific job position, this cannot serve as a valid reason for termination of employment. Instead, the employee will be offered an alternative suitable position within the organization, in accordance with their qualifications.

Analysis, Project Proposals, and Reports

AI technologies and tools may be used for:

- Translation, proofreading, copy editing, summarization

- Formatting titles and subtitles

- Processing large data sets

- Systematizing internal organizational data

- Creating visual elements such as charts and infographics