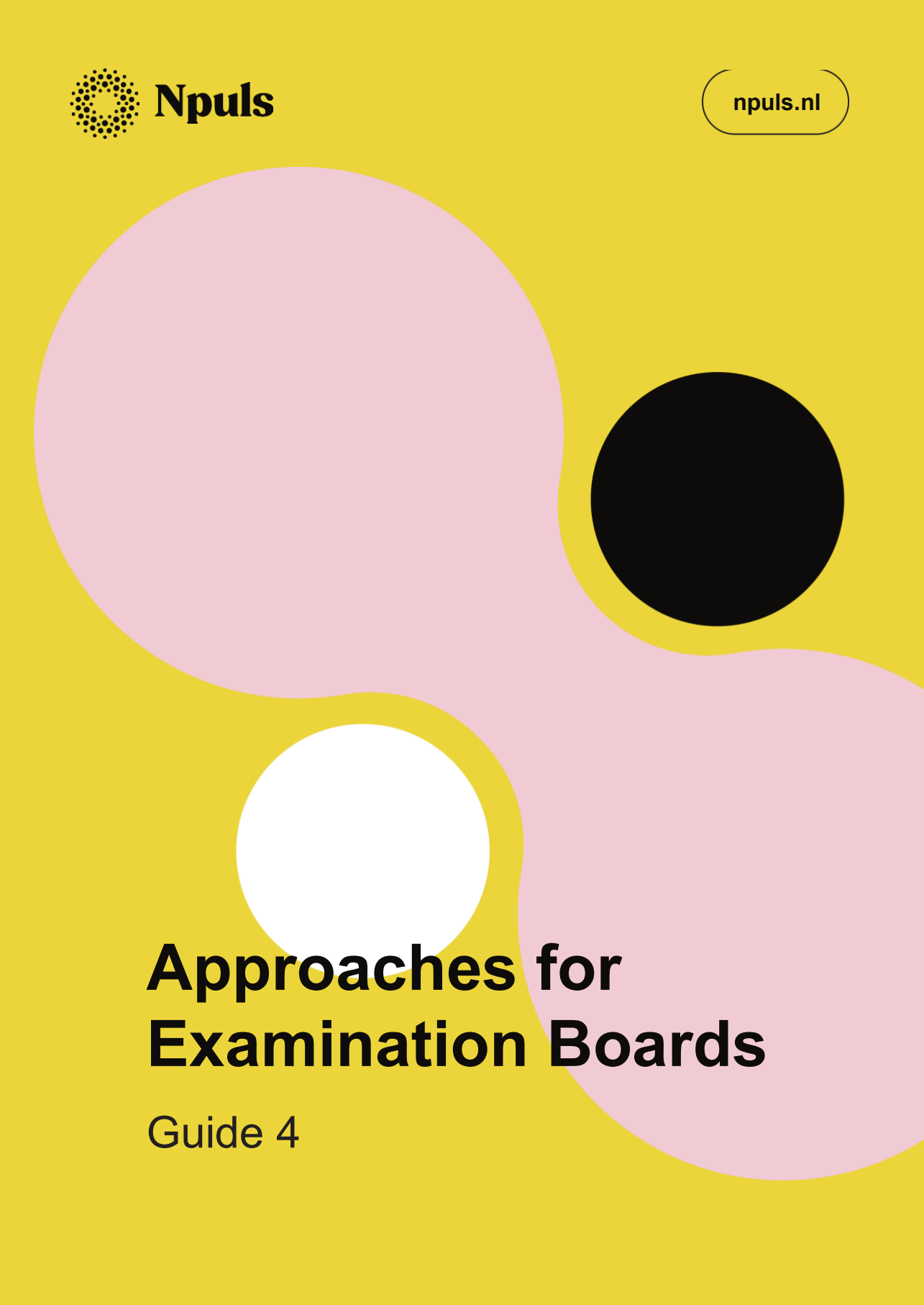




Approaches for Examination Boards

Guide 4

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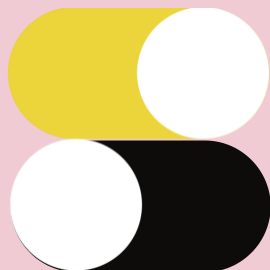
Guide 4

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1. Introduction

The rise of generative artificial intelligence (GenAI, hereinafter AI), which includes tools like ChatGPT, Gemini or DALL-E, is shaking up the field of education. This raises fundamental questions, particularly about the method of assessment and examination. Whereas previously a written final product (essay, design, report) or a traditional exam was sufficient to assess students, it is now often unclear to what extent AI contributed to that result. Recent studies show that around 80% of students use AI-tools during their studies (Ma, 2025; Fütterer et al., 2023), while only 35% of institutions have drawn up clear guidelines for AI use (Cotton et al., 2024). Moreover, society demands AI-literate graduates – professionals who can use AI in a responsible, critical and ethical manner in their field of expertise. AI literacy has become a critical competence, with students expected not only to develop technical skills but also critical thinking and ethical awareness (Promma et al., 2025; Tsai et al., 2023). Structurally embedding AI literacy throughout the institution's curriculum and assessment policy is essential in guiding students through the process of critical, ethical and effective use of AI tools and to prevent dependency on the use of AI (Ng et al., 2021; Shi et al., 2025; Tsai et al., 2025). Educational institutions must prepare students for this; in addition to subject knowledge and complex skills, they must also learn how to use AI and understand its limitations and ethical implications (Ng et al., 2021; Shi et al., 2025; Tsai et al., 2023).

The accessibility of AI tools has created a new reality where the authenticity and validity of student performance has to be reconsidered. While this development offers unprecedented possibilities for educational innovation, personalised learning pathways and efficiency, it also poses challenges – for example regarding integrity in assessment processes and the value of diplomas and qualifications. Examination boards in vocational education and training, higher professional education and research-oriented education play a pivotal role in safeguarding the quality and societal impact of diplomas, qualifications and certificates. The statutory duties of examination boards (laid down in the Dutch Higher Education and Research Act (*WHW*) for higher professional and research-oriented education and the Dutch Adult and Vocational Education Act (*WEB*) for vocational education and training) are carried out within the framework of the Dutch Education and Examination Regulations (*Onderwijs- en Examenreglement, OER*) of study programmes. Their role in this new technological landscape has become even more crucial.

In educational and assessment practices where AI applications are increasingly used, the key question for examination boards is: how do we maintain insight into the learner's authentic performance (attribution) while guaranteeing that all qualification requirements are met, despite – or thanks to – AI? This challenge is different for each educational sector. In vocational education and training, the main issue is the tension between authentic vocational preparation on the one hand and AI use in practice on the other (Willemse & Van der Neut, 2020). In higher professional education, the focus is on striking a balance between competence-based education and AI integration. In research-oriented education, the focus is mainly on maintaining academic integrity and research skills (TEQSA, 2023).

Addressing this complex challenge lies in finding the right balance between harnessing the potential of AI to enrich education and assessment while upholding didactic, academic and professional standards, pedagogical values and independent, expert assessment of student output.

Purpose of this guide

Rapid developments in AI require a fundamental rethinking of what constitutes valuable learning and how we can assess this in an authentic way. AI acts as a catalyst that intensifies and reframes existing discussions about the essence of assessment – what we measure, how we measure, and why we measure. This means we cannot simply resort to prohibiting AI use or making education “AI-proof”. Instead, we must design AI-aware educational and assessment practices. Increasingly, it is about redefining demonstrable competence in a world where AI is an integral part of many work and learning processes. This also requires examination boards to develop an additional set of competencies: knowledge of AI detection technology and its limitations (Sadasivan et al., 2023), understanding privacy implications in the use of plagiarism detection (Yan et al., 2024) and the ability to formulate policies that foster innovation while safeguarding quality. We need to take action to ensure that AI is embedded fairly and inclusively in assessment and examination – both within institutional frameworks and in national and European legislation (EU AI Act, 2025) – with respect for human agency and in the service of quality, transparency and fairness (UNESCO, 2023). This guide aims to contribute to these ambitions by providing a foundation and practical guidance. In this guide, we have drawn on recent scientific insights and case studies and aim to present approaches that can be shared across educational sectors.

Key principles

In this guide, we address the various roles and responsibilities of examination boards (policy, organisational, operational) and offer practical step-by-step plans and checklists to safeguard assessment quality in a reality where AI use is increasingly normalised. The recommendations are based on scientific insights and align with the Dutch National Vision document on assessment and examination in the age of AI. We apply the following key principles as a framework for this guide:

- **Human-centred and transparent:** While AI applications can support education and assessment practices, they should never take over learning processes or decision-making. Human agency and oversight therefore remain essential. Human involvement is required in assessment (EU AI Act, 2025).

When designing educational and assessment practices, it must be clear which AI applications are integrated into education and assessment, why this is done, in what way these contribute to the intended learning objectives, and what this implies for all stakeholders. Furthermore, decisions about the established quality of output or the management/adjustment of learning processes must be transparent, valid and reliable. In practice, this means examination boards must specify which AI tools are permitted in which assessments, how AI use is documented (for example through mandatory AI statements), and when further verification is required (such as oral assessments after AI-assisted assignments). Clear regulations (such as in the OER) on AI in assessment and examination are needed to ensure that students and teaching staff are not faced with surprises during any investigations or reviews. Such regulations also contribute to transparent decision-making by examination boards.

- **Fairness and inclusion:** AI should not create new barriers or disadvantage certain groups. A key guiding principle is the promotion of equity (Bakker et al., 2024). All students must have equal access to AI assistance and be protected against bias. Examination boards must remain alert to various forms of inequity: not all students have access to paid AI tools like ChatGPT Plus, international students may be disadvantaged by AI tools that are mainly in English and students with disabilities may encounter additional barriers. The use of AI must therefore be inclusive and enable equal access for all students.
- **Validity and reliability are paramount:** Assessment is used to support and guide student learning towards intended learning objectives. Assessment is also used to evaluate the effectiveness and quality of educational offerings. Finally, assessment is used to establish the quality of student output in relation to learning objectives, thereby enabling decisions about students' progress or completion of learning processes. In light of all these functions, assessment must measure what it intends to measure (validity) in a fair and consistent manner (reliability). The integration of AI introduces specific validity issues such as: How do we distinguish individual performances from AI-assisted ones? How do we ensure authenticity in take-home assignments? And how do we prevent AI detection tools from leading to false accusations (Perkins & Furze, 2024)? In each sector, the examination board plays an important role in safeguarding quality and validity.

2. Ethics, privacy and legislation

Before discussing the roles and responsibilities of examination boards in further detail, it is important to emphasise that examination boards must have up-to-date knowledge and understanding of AI legislation, current technological developments and their effects on data protection, privacy and ethical issues. This allows them to carry out their roles and responsibilities in the educational institution properly and with due care. Below are several relevant frameworks and points of attention.

European legislation (EU AI Act): At the European level, the legal basis for AI in education and assessment is covered in the EU AI Act. The AI Act, which is one of the components of the European AI strategy, contains requirements and frameworks for the development and use of AI applications by market parties and government institutions, including in education. The AI Act classifies AI systems according to a risk-based approach (prohibited, high-risk or transparency-risk) (European Commission, 2023). AI systems in education that are classified as high-risk include applications used for (1) determining access, admission or allocation to educational institutions, (2) evaluating student learning outcomes or guiding learning processes, (3) assessing the appropriate educational level for an individual and (4) monitoring and detecting unauthorised student conduct during assessments. This classification entails specific obligations for both providers and users (educational institutions). Educational institutions must, in certain cases, comply with legal frameworks and obligations concerning transparency, quality assurance, human oversight and inclusivity. The specific requirements and obligations for using high-risk AI systems vary depending on the application, the intended use and procedure, the provider and the users of the system. AI systems used purely for research and development within an institution are exempt from the AI Act rules, for example, an experimental AI system developed by a university to study plagiarism patterns. However, once that system is used for actual plagiarism detection during exams, it falls under the scope of the AI Act (Section 6.3). The obligations under the AI Act will be implemented in phases, with some provisions already effective in 2025 and others following later. A more detailed explanation can be found in the guide issued by Npuls on this regulation (Kuijvenhoven & Baten, 2025). What is clear is that the EU AI Act affects the responsibilities of educational institutions. They are no longer passive consumers of AI applications but active users who have additional obligations. Examination boards must ensure that institutions are aware of and comply with these obligations.

Data protection and privacy: The principal legislation governing the protection of personal data is the General Data Protection Regulation (GDPR). The rules for processing personal data are laid down in this European legislation. These rules also apply to educational institutions – the GDPR applies to assessment and surveillance systems, learning analytics, adaptive learning systems but also AI applications. The Dutch Data Protection Authority (*Autoriteit Persoonsgegevens*) supervises compliance with the GDPR and identifies specific challenges and risks of AI in education, such as limited control over software, lack of transparency on the use of data, errors or bias in adaptive systems and privacy breaches through learning analytics. The introduction of AI in education and assessment requires additional attention to data use, data protection and privacy and updates to existing protocols. When data processing entails a high privacy risk for students, the GDPR requires a Data Protection Impact Assessment (DPIA). This is a mechanism for identifying privacy risks in advance and taking measures to mitigate them. An additional requirement under the AI Act is a Fundamental Rights Impact Assessment (FRIA). A FRIA is a systematic process to evaluate and address the potential impact of an AI system on individuals' fundamental rights (such as non-discrimination, privacy, human dignity and fair treatment). A FRIA includes a description of the AI system, its intended use, the duration and frequency of use, bias and discrimination test results, oversight mechanisms and control measures. Although the DPIA and FRIA have some features in common, they both have their own focus. The DPIA concentrates primarily on privacy and data protection risks, while the FRIA is focused on fundamental rights.

This dual requirement for many high-risk AI applications in education implies that institutions must not only protect personal data but also proactively assess a broader range of rights and impacts. They must also ensure risk limitation and control. What does this mean in concrete terms? Student work or student data may not be shared with third parties (including AI tools) without a legal basis or the student's explicit consent (Van Toor-van Essen & Den Heijer, 2024). AI tools like ChatGPT often store prompts and text input on servers outside the EU, which poses risks to privacy and intellectual property. Moreover, these tools may use input data to train their models, unless explicitly disabled in the privacy settings (OpenAI, 2024). Examiners and teaching staff must be aware of this when assignments are uploaded to public AI services (Van Toor-van Essen & Den Heijer, 2024). Institutions may consider implementing secure, locally hosted AI solutions or using enterprise versions that have added privacy safeguards (SURF, 2024). A practical guideline is to avoid sharing personally identifiable student data with external AI tools unless the student has explicitly given consent for this and the risks have been clearly communicated.

National policy and legislation: In addition to European frameworks, there are also national regulations on assessment and examination. These include the Dutch Higher Education and Research Act (*WHW*) for higher professional and research-oriented education and the Dutch Adult and Vocational Education Act (*WEB*) for vocational education and training. These national laws define the responsibilities of examination boards and the manner in which they safeguard the quality of assessment and examination (fair, appropriate and reliable). They also stipulate that diplomas and qualifications can only be issued when all qualification requirements have been met. While these existing legal frameworks remain in full force, the integration of AI in assessment and examination will require examination regulations to be updated (OER in higher professional/university education, assessment and examination plans in vocational education and training) to include clear specifications about AI use so that enforcement remains legally tenable.

Ethical considerations: Fundamental ethical principles are paramount in assessment and examination. This also applies to assessment practices that incorporate AI; equality, fairness and justice are vital. Yet there is a risk of AI reproducing certain biases or inaccuracies, for example because training data are skewed – this may result in unrepresentative or even discriminatory outcomes (Zhang et al., 2024). Furthermore, some student groups could benefit or be disadvantaged by AI use. Educational institutions must therefore be aware of these risks. Transparent procedures, suitable protocols and clear communication are vital to this end. Students and teaching staff must know when, how, why and in what form AI plays a role in assessment and examination. Assessment and examination must be designed to align with these ethical principles, and examination boards must ensure that AI use does not negatively affect integrity and quality (UNESCO, 2023). The guiding principle for ethically responsible AI use is: AI assists, humans decide.

Mandatory AI use: Making AI use mandatory for students is an additional area of attention. If a study programme requires students to use an AI application (for an educational or assessment activity), this must be compatible with the GDPR. From a didactic standpoint, integration of AI in teaching and/or assessment is often justifiable, especially if AI use is part of the learning objectives and is included in assessment criteria. However, if this means students must create an account and enter personal data into an external AI service or tool, institutions may not oblige students to do so (MBO Digitaal, 2024). Voluntary participation and informed consent are essential. Making it mandatory to register an account is only allowed with students' explicit consent and only if a viable alternative is available for those who do not wish to participate (AP, 2024). Institutions are advised to establish clear guidelines on AI tools they recommend students to use, in line with privacy legislation and ethical standards. Examination boards must be aware of these additional obligations and ensure that processes are followed diligently.

This means being aware of and understanding technical aspects such as: How does the AI application work? What data does it use? What decision-making rules does it apply? It is also important to understand legal frameworks and issues such as diligence in data protection, privacy and personal data, accessibility, inclusivity and fairness. AI integration in assessment and examination is not prohibited and should certainly not be avoided. However, AI-aware assessment practices must be implemented with due care, and that requires more than just safeguarding assessment quality.

3. Examination boards in tertiary education

The advent of AI in education and assessment calls for new insights and approaches, including by examination boards as quality custodians of assessment programmes. Examination boards are the independent, final link in the assessment and qualification cycle. They are responsible for safeguarding assessment quality and the value of qualifications in all three sectors of tertiary education in the Netherlands. Examination boards oversee the cohesion between learning objectives and learning outcomes. They monitor and evaluate assessment practices, refining them where necessary. They also make decisions on exemptions, personalised programmes and/or possible misconduct (based on fair hearing procedures) in individual student cases. On the basis of statutory mandate, examination boards hold formal powers that are operationalised internally in daily processes. The institution's executive board or governing body makes it possible for the examination board to fulfil its duties, but has no say on the content of these duties. This way, the independence of examination boards is maintained and safeguarded. Quality assurance by examination boards extends beyond their own institution. In vocational education and training, inspection reports are submitted directly to the executive board and government bodies. In higher education, the examination board provides evidence for reviews by the Accreditation Organisation of the Netherlands and Flanders (NVAO), where assessment is one of the standards evaluated. Review panels can only reach a positive opinion about assessment and examination if the entire quality cycle is demonstrably robust.

In practice, the examination board focuses on duties and responsibilities in three areas: policy, organisation and implementation. While these areas of focus are universally applicable, there are differences in implementation and nuance by educational sector. In vocational education and training, the emphasis is on practice-based examination and collaboration with the professional field. In higher professional education, the emphasis is on competency-based assessment and portfolio assessment, while in research-oriented education, the focus is on academic integrity and skills (NVAO, 2024). Before considering universal roles and responsibilities, we first discuss the activities and legal frameworks of examination boards in the three tertiary education sectors.

Examination boards in vocational education and training: In vocational education and training, the roles and obligations of examination boards are set out in the Dutch Adult and Vocational Education Act (*WEB*). They work with core assignments and work processes (vocational exam components), generic components and elective modules on the basis of qualification files. In doing so, they make a distinction between institutional exams (developed by the school) and central examinations (established nationally). Section 7.4.5 of the *WEB* requires the competent authority to establish an independent and expert body, while Section 7.4.5a lists the powers individually: approval of institutional exams, setting guidelines for assessment, granting exemptions, deciding on certification and issuing diplomas, qualifications or institutional certificates.

The Inspection Framework verifies whether the examination board performs its role visibly and reports annually on its activities. This ensures that the national assessment standards in Section 7.4.4 of the WEB are demonstrably met. Examination boards in vocational education and training do not have a support role other than dealing with irregularities. Their sole responsibility is quality assurance of exams and approval of institutional exams. Teaching teams are responsible for other forms of assessment. In vocational education and training, exams are primarily procured from certified suppliers based on sectoral agreements on valid examination tools. Where exams are designed by the institution itself, the product requirements of the *Valide Examens mbo* (VEMBO) foundation are applied. The examination board ensures the quality of internally developed exams as well as externally procured exams and adopts them. In many cases, an adoption advisory committee (*vaststellingscommissie*, VAC) serves as an advisory body for examination boards, for example on the content alignment and technical quality of the exams.

The emergence of AI adds a new dimension to safeguarding assessment quality. Institutional exams for the vocation-specific components of education are often practice-oriented and conducted in an authentic or simulated practice setting. In such a context, the examination board must ensure the validity and authenticity of the assessment. AI use can affect this, for example if students generate reflections or portfolio components (as part of practice assignments) using AI. Examination boards must ensure that the outcome, even with AI use, remains a genuine reflection of what a student is able to do in practice. Alongside the key principles mentioned earlier, the valuation framework in vocational education and training applies the principle of equivalence of assessment conditions and grading. If AI use is permitted in an assessment or exam, all students must have equal access to it. The AI tools used in assessment and examination must comply with the GDPR, especially when student work is uploaded to external AI services (Van Toor-van Essen & Den Heijer, 2024).

Examination Boards in higher professional & research-oriented education: In higher education, the foundation for examination boards is in the Dutch Higher Education and Research Act (WHW). Section 7.12 of the WHW defines the examination board as the body that objectively and expertly determines the final level of learning. Section 7.12a prescribes independence, expertise (and an external member). Section 7.12b sets out quality assurance, the setting of guidelines and imposition of fraud penalties, while Section 7.12c grants the mandate to appoint examiners. These statutory powers can only be exercised effectively if the examination board operates outside the hierarchical structure of the educational institution and develops its own frameworks within the Dutch Education and Examination Regulations (OER).

In higher professional education, examination boards maintain oversight of assessment quality and pay explicit attention to translating professional requirements and workplace perspectives in assessments. AI applications are potentially powerful technological tools, but student learning processes and development must remain the primary focus. Examination boards must guarantee that graduates meet the final qualifications established in consultation with the professional field (WHW, art. 7.12b). In practice, this means overseeing acceptable AI use relative to the requirements and needs of the professional field and safeguarding diploma value.

In research-oriented education, the focus is on knowledge development and creation and on academic integrity. Students are trained to become critical thinkers who can independently process complex information, generate insights and reason logically within various scientific disciplines. Students' cognitive ability, originality and methodological rigour are paramount. Under the WHW, examination boards in research-oriented education uphold academic integrity principles. They also ensure fairness and assessment quality, so that a university degree continues to represent proficiency in academic skills and applicable standards of research ethics.

In higher education, AI-enabled assessment may – depending on the intended learning objectives – be used to gain insight into ethical AI use by students and to support or enhance student learning processes and student performance. Students must clarify how this takes place (Universities of The Netherlands; VSNU, 2024) and the extent to which it is ethically tenable and appropriate, for example by specifying which tools, prompts and verification methods were used for literature review, data analysis or generating new knowledge. If there are doubts about the authenticity or level of proficiency, additional, alternative assessment methods may be introduced. Decision-based assessment also takes place to establish individual student performance without AI use.

4. Policy, organisation and implementation

Examination boards face the challenge of safeguarding the quality and integrity of assessments in an education and assessment landscape where AI is increasingly prevalent. Their role is gaining prominence in the areas of policy, organisation and operation. As previously stated, in vocational education and training, the examination board focuses solely on overseeing assessment quality and the legality of examinations as defined in the Dutch Adult and Vocational Education Act (*WEB*). Where this section refers to assessments or exams, it means central examinations in vocational education and training schools.

Policy: Examination boards are responsible for formulating clear frameworks and rules regarding assessment and examination. At policy level, the examination board lays the foundation for how the institution and programmes address AI in assessment. This concerns frameworks and rules that apply broadly (e.g. at programme level) and that provide guidance for organisational and operational activities. Given AI's increasing influence on assessment and examination, existing policies and rules must be tightened. This requires more than simply adding an AI section to the OER or examination plan. Examination boards must explicitly set out agreements about AI use, how these are enforced, the consequences of prohibited use, how AI use is documented (for example, through mandatory AI statements), which tools are permitted, when additional verification is required (for example, if there are doubts about student effort) and adapt regulations accordingly (Van Toor-van Essen & Den Heijer, 2024).

Policy-level questions: The emergence of AI raises fundamental questions concerning validity, institutional policy and legislation which examination boards must address:

- How do we safeguard assessment quality? When is AI use in assessment appropriate and when does it undermine the authenticity of student output?
- What assessment principles do we apply to prevent AI use from undermining qualification value?
- What legal scope is there for regulating the use of AI? How do we safeguard transparency without infringing student rights?
- How do we ensure equity? Does every student have comparable access to AI tools or is AI creating new inequities that we must address through policy?

Revision and communication: The above issues highlight the importance for examination boards to set or adapt agreements, frameworks and approaches in line with the institution's educational and assessment vision. Where there are deviations or breaches, examination boards must enforce the regulations consistently and equitably. Examination boards can initiate ethical dialogues within the institution, for instance about what constitutes fair or legitimate use of AI.

Organisational duties: Formulating policy is one thing; ensuring it is followed in practice is the next challenge. Examination boards must communicate about existing or adapted guidelines, frameworks, standards and their policies within the institution and oversee compliance with these requirements.

This means informing all those involved in education and assessment about the guidelines and the agreements made – based on institutional frameworks, legislation and regulations – and how examination boards monitor and enforce compliance. The examination board has a supervisory and coordinating role: ensuring that adopted policy choices are translated into operational practice consistently and that there are no arbitrary decisions. The examination board's organisational duties therefore concern designing processes, communication and documentation so that consistency and transparency are safeguarded.

Questions at the organisational level

Questions examination boards will have to address at the organisational level, such as those relating to registration, communication and expertise, are:

- How do we register and document AI use without violating privacy and data protection laws?
- What qualification requirements must examination board members, examiners or external assessors meet in assessment, what professional development and support is needed to ensure the quality of AI-aware assessment, and for whom does this apply?
- How do we give students and teaching staff clear information about permitted AI use, policy and fraud regulations?
- How do we, as an examination board, document trends in observed AI misuse?
- How and when do we assess the effectiveness of our fraud prevention policies?

Documentation and registration: Given the anticipated rise in AI-related fraud cases and the need for examination boards to deal with these diligently, documentation and registration are crucial. This is not only for examination boards' annual reporting purposes but, more importantly, to share good practices, learn from dilemmas and adapt professional development and approaches. Such organisational agreements and insights make it possible to learn and to update policy, both within individual institutions and between institutions, as needed.

Implementation: Finally, examination boards are responsible for operational duties – such as monitoring assessment quality and the quality of administering assessments, making decisions on the quality and correctness of procedures when in doubt, awarding diplomas and certificates, ensuring qualification value, granting exemptions, investigating irregularities, detecting and possibly sanctioning fraud and dealing with complaints or appeals from students.

Questions at the operational level

Questions examination boards may encounter in performing their role concern authenticity, permitted AI use and the assessment of previously acquired competencies (PAC):

- To what extent can the student's performance be attributed to the student themselves? Does this demonstrate the intended final level with sufficient transparency and assurance?
- When is AI use permitted and when is it not? When does AI use undermine the authenticity of the student output? How and when was this communicated to students? To what extent can prohibited AI use be established if procedures and guidelines for assessment are unclear or have not been discussed beforehand?
- How do we handle complaints from students who are wrongly accused of inappropriate or fraudulent use of AI?
- How can previously acquired competencies or exemption requests be assessed while maintaining quality and value?

Additional duties: Examination boards must be prepared for new forms of fraud involving AI. It is vital to recognise that AI detection tools, such as Turnitin's AI detector, have an error margin of 20-30% (Sadasivan et al., 2023), so false positives are possible. A suspicion substantiated solely by a high score from a detection tool is never sufficient evidence. Further investigation is always required. It is essential that every case is treated with due care and that a fair hearing takes place. Students must have the opportunity to explain how their results were achieved. In cases of doubt, examination boards may permit additional assessment methods (such as an oral defence) to determine individual competencies. In AI-aware assessment practices, examination boards may need to revise or extend some of their operational duties:

- Examination boards are advised to register and document AI-related cases and dilemmas, share knowledge and experiences and exchange good practices. Developments in technology but also case law are evolving rapidly. Developing protocols for cases of fraud or suspected inappropriate or unauthorised use of AI, maintaining good practice records, learning from approaches and sharing knowledge – both within and outside the programme – are all beneficial to the examination board's safeguarding role and to maintaining assessment quality within programmes. Communication and knowledge sharing are vital to this end. This also applies to communication about fraud policy and fraud prevention, content and application of "permitted AI use" and updated or revised

enforcement measures by examination boards in respect of study programmes. In a learning culture, professional development in AI literacy and digital assessment competence can be pursued collectively.

- Examination boards safeguard the quality of assessment. Broadly speaking, they can closely monitor and evaluate the quality of assessment within the assessment programme. This allows for periodic verification of whether assessments remain aligned with the principles outlined in this vision. Specifically, this may include monitoring whether the Two-Lane approach (if adopted) is implemented properly (Lodge et al., 2023a): “Do Lane 1 assessments meet the principles of good assessment to determine the quality of student output? To what extent does the offering in Lane 2 assessments align with the intended learning objectives and foster the desired AI literacy of students?”
- Examination boards can proactively advise the institution’s executive board on matters such as the need for central AI licences to prevent inequity, potential investments in privacy-safe, controllable AI-driven learning environments, required professional development for teaching staff in digital assessment competence or required adjustments for controllable assessment environments.
- With the EU AI Act (2025) coming into force, examination boards will also have a role to play in compliance. Institutions, as users of AI applications, have obligations they must fulfil. Examination boards must ensure transparency, explainability and regular audits of the AI tools used (European Commission, 2023).

In closing

The integration of AI into education and assessment – and the entry into force of the EU AI Act (2025) – require examination boards to oversee integrity and ethical AI use, transparency and human agency and oversight (Section 6). It is not the role or responsibility of examination boards to influence the educational offerings of programmes, nor do they prescribe assessment designs. However, open dialogue and closer cooperation with programme teams, curriculum committees and assessment committees certainly contribute to constructive alignment, fair, relevant and up-to-date assessment and, ultimately, robust assessment quality. This calls for a coherent approach, with examination boards not only enforcing regulations reactively but also anticipating, advising and adjusting their own activities proactively. Only in this way can assessment quality, final attainment levels and the value of diplomas and qualifications be safeguarded while allowing for the possibilities of AI in education and assessment to be explored in a considered manner – taking into account the potential risks and remaining within legal boundaries.

5. Practical guidelines

The step-by-step plan below provides practical guidelines for examination boards to integrate AI into assessment and examination in a responsible and effective way. This plan covers concrete actions that range from policy revision to professional development and includes checklists and examples for all sectors of tertiary education in the Netherlands. The steps are tailored to different areas of responsibility – such as policy, organisation and operation – in line with the national vision and shared principles outlined in related guides, with the Two-Lane approach playing a central role in judiciously integrating AI into assessment programmes (Lodge et al., 2023). Possible options for examination boards are outlined in respect of: 1) assessment vision and policy (AI-aware), 2) setting up/adjusting procedures and guidelines, 3) ensuring transparency, information and communication, 4) professional development, and 5) safeguarding assessment quality and the value of diplomas and qualifications. Examination boards may follow these steps sequentially, but the different actions will generally need to be taken in conjunction with one another.

STEP 1

Updating assessment policy and vision (AI-aware assessment)

Purpose: To update formal frameworks and guidelines so that it is clear how AI may or may not be used in assessment, with due regard for relevant legislation and regulations.

Actions (policy):

- **Revise regulations on fraud and plagiarism:** Adapt existing regulations (OER/examination plans) to explicitly address agreements and frameworks for AI use. A possible addition is: “The use of AI-generated content without attribution is considered plagiarism. Submitting work generated exclusively by AI without any intellectual contribution of your own is considered fraud” (in accordance with the model OER of the Netherlands Association of Universities of Applied Sciences, 2024). Also state that where AI is permitted, this should always be accompanied by an explanation. These frameworks increase the validity of the assessment and provide clarity about authenticity, as it is clear to everyone how the result was achieved. This aligns with the view that AI use should not be prohibited or excluded, but that its use should be transparent and traceable where possible. For additional information, see GDPR Section 5 for principles such as fairness and transparency, and see Kooli (2023) for an overview of how institutions can adapt their examination regulations.

- **Define use categories:** Specify in policy documents what is meant by permitted or prohibited AI use in assessment, how this should be implemented and enforced and what obligations this entails for teaching staff and students regarding transparency, privacy, data protection, authenticity and ownership. For example: “AI support is permitted for brainstorming, correcting language and spelling and generating ideas in preliminary assignments, but not for ...”. Such frameworks improve validity, reliability and objectivity in assessment. They also help clarify whether these assessment principles can be sufficiently safeguarded – in line with the assessment function – where assessment assignments are not always fully controllable or supervised. Consider including these in appendices or an addendum to examination plans/OER, and include their evaluation in quality cycles. Many institutions now implement a three-pronged approach. For example, a traffic light system may be used to indicate where AI use is fully permitted, partially permitted, encouraged or excluded.

- **Include student accountability in the regulations:** Determine how students must document their AI use. Erasmus University Rotterdam, for instance, stipulates mandatory AI statements covering four elements: (1) which AI tools were used, (2) for what purpose, (3) which prompts were entered and (4) how the output was used (EUR AI Usage Guidelines, 2024). Such requirements must be established in policy so that examiners can enforce them.
- **Communicate responsibilities to programme teams:** Notify those responsible (programme directors, education managers, team coordinators, curriculum committees) that they are accountable for integrating these AI policy frameworks into education and assessment programmes.
- **Vision development and external alignment:** Publicise institutional policy frameworks and encourage the development of assessment programmes within these frameworks. In vocational education and training, this also means coordination with industry associations on the use of AI in professional practice, the Netherlands Assessments and Examinations Board (*College voor Toetsen en Examens, CvTE*) on central examinations, and external examination providers such as *Stichting Praktijkleren*. Ensure compliance with these frameworks, starting the contracting stage, and include guidelines for the use of AI in examinations as a joint item of development.

Checklist Step 1: Update policy

- Rules in the OER and examination plans adjusted with explicit passages (check: do these contain a definition of fraud/plagiarism with regard to AI?). Pay attention to sequence and flexibility for the sake of adaptability;
- Overview/categorisation of assessment methods with permitted and controllable prohibited AI use (in an annex or matrix added to the policy);
- Requirements, guidelines and/or protocol for student accountability and ownership in the assessment manual, for example by means of an AI statement;

- Communication strategy towards students and teaching staff about policy updates, additions and changes;
- Programme managers and assessment creators are informed about new policy frameworks. They confirm how AI is integrated into their assessment programme and present it to the examination board for approval;
- External stakeholders are consulted and agreements are documented;
- Specifically in vocational education and training: Contractual agreements with assessment providers about AI policy are documented.

STEP 2

Organise documentation, prevention and detection of misuse with due care

Purpose: To embed procedures and tools for monitoring AI use and detecting potential misuse in a manner that is both reliable and legally tenable.

Actions (organisational):

- **Introduce protocols for permitted and prohibited AI use:** Under WHW Section 7.12b and WEB Section 7.4.8, examination boards have both the authority and the duty to identify fraud. It is important to recognise (and communicate internally) that AI misuse cannot be unequivocally determined solely through detection tools. Current tools do not always identify AI-generated content accurately or may wrongly flag text as AI-generated. Explicitly state this limitation (for example, in a manual for examination boards and teaching staff) so that the results of detection tools are always critically assessed and combined with human judgement (Feizi et al., 2023; Sadasivan et al., 2023).
VSNU recommends a three-step protocol when using AI detection tools: (1) technical detection for initial screening; (2) stylistic analysis by the teacher or lecturer; (3) a discussion with the student about the creation process (VSNU AI Integrity Guidelines, 2024).
- **Safeguard privacy:** Ensure all documentation relating to AI use complies with privacy and data protection legislation (GDPR). (See the Privacy and Ethics Reference Framework for Education Data, 2022). Do not collect more data than is necessary. For example, if students report AI use, define who can view this information and how long it will be kept. Some supplier-provided AI detection tools may not be used if it concerns privacy-sensitive data or requires explicit consent from students. The use of AI detection tools often necessitates a Data Protection Impact Assessment (DPIA), particularly if students' texts are sent to servers outside the EU, writing style profiles are created or decisions about fraud are fully or partly automated. There must, at the very least, be a processing agreement and students must be informed through the privacy statement (AP, 2024).

- **Record procedures for AI-related fraud investigations:** Expand existing fraud protocols with steps for addressing AI-related misuse and suspicions. On what grounds is suspicion established, how is it documented (screenshots, second opinion, etc.), how is the student interviewed, how was the student (previously) informed about AI use and what evidence is taken into account? It is advisable to give the student the opportunity to provide an explanation, justification (fair hearing) and an authenticity verification. A fraud protocol may entail the following steps:

- **Detection:** A teacher/lecturer observes possible AI use (through detection, recognition of writing style or inconsistencies in content)
- **Documentation:** Document detection scores, screenshots and comparison with previous work
- **Initial assessment:** The examination board determines if further investigation is warranted
- **Hearing of all parties:** The student has at least ten working days to respond in writing
- **Verification interview:** The student provides an oral explanation where they must be able to account for their work- **Decision:** A decision is made based on all the above information, with a substantial burden of proof on the institution
- **Possible sanction:** This must be in accordance with the sanction catalogue in the OER/examination plan.

- **Document decisions and cases:** Document or record AI-related cases for trend analyses, annual policy reviews and justification of any adjustments. For instance, record when, where and how often AI misuse has been investigated or established and what arguments were considered. An anonymised registration system can generate quarterly reports for policy evaluation based on categories (such as HU Fraud Registration Protocol, 2024):

- Type of suspected AI use (fully/partially/prohibited tool)
- Detection method (tool/teacher/combo)
- Evidential value (strong/moderate/weak)
- Outcome of procedure (proven/not proven/dismissed)
- Sanction imposed.

Example in vocational education and training: A nursing student submits a comprehensive patient report with strikingly academic language. The practice supervisor does not recognise this writing style. The examiner suspects that the student used an AI tool (like ChatGPT) to write the report. The examination board investigates the issue: they compare the report with work previously submitted by the student and invite the student to explain orally how they produced the report. This reveals that the report does not fully reflect the student's own knowledge and insights. Consequently, the examination board decides that the report is not valid as an examination outcome. The student must complete an additional assignment to demonstrate the required level of proficiency in the relevant knowledge and skills before their work is graded.

Checklist Step 2: Organisation & documentation

- Protocols for AI use, detection and storage (in collaboration with legal affairs and IT) expanded, adjusted and established;
- GDPR check performed and data processing agreements signed with providers;
- Where relevant, a DPIA for an AI detection tool (document number: ...), or consent arrangements in place for the use of AI tools that process student data;
- Fraud protocol procedures expanded; step-by-step plan for suspicion of AI misuse included (in regulations or an internal manual);
- If required, clarity provided about the point of contact/linchpin in the examination board vis-a-vis programme teams as the contact/AI integrity officer in AI-related assessment matters;
- Operational registration/documentation system for AI-related cases for evaluation, accountability and/or knowledge sharing;
- Quarterly case reports shared with the Executive Board;

STEP 3

Transparency and information

Purpose: Communicate clearly to all parties (students, teaching staff, examiners, practice supervisors, curriculum committees) what is expected of them in assessments so that compliance with rules and agreements becomes self-evident.

Actions (organisational and operational):

- **Communicate and publish:** Inform all those involved in the assessment process about revised procedures, legal frameworks, clear guidelines and enforcement processes by the examination board. These should clearly state what is deemed permitted or prohibited AI use, when this is the case and what the consequences are.
- **Update formats and templates:** Adapt existing templates for assessment and examination plans, matrices, or validation forms to account for AI use. For example, an assessment validation form might include "Is AI use permitted for this assessment assignment? If so, under what conditions and how is this communicated to students?" This obliges assessment designers to consider AI beforehand and ensures that the examination board explicitly approves the choice made. In vocational education and training, such additions can also be included in the school's examination plan or Programme of Assessment and Conclusion (*Programma van Toetsing en Afsluiting, PTA*). This ensures clarity about permitted AI use before every assessment or exam, which prevents disputes afterwards. Add information to assessment files/programmes regarding:

- Suitability of the current assessment method based on assessment function and intended learning objectives;
 - Category of AI use (permitted, partially permitted, prohibited);
 - Method of supervision, monitoring and controllability for formative and summative assessment;
 - Possible alternative assessment methods.
- **Accountability for AI use by students:** Communicate transparently and clearly what supporting statements or evidence students may need to provide to demonstrate/account for permitted AI use (e.g. prompts, version history, reflective accountability). This raises awareness and fosters ethical use. It also increases transparency and efficiency. Several institutions require students to submit AI statements with their assessment assignments. In an AI statement, the student states if and how AI tools were used.
- If this guideline is applied, include it in the assessment assignment or submission portal.

Structural implementation is needed.

- **Consult with programme teams, assessment designers/experts, education committees:** As the examination board, engage in discussions with the education committee/assessment committee, assessment experts and/or teams about AI integration and implementation to clarify aspects that may need to be refined or adjusted. Open dialogue and cooperation ensure that programme choices with regard to assessment lead to quality assessments and insight into the level of proficiency. Elements that examination boards must be able to guarantee. Examples of relevant questions are:
- To what extent does the assessment programme comply with institutional policy, legal frameworks and regulations?
 - How do we organise and enforce compliance?
 - To what extent are AI-driven assessment practices equitable, inclusive and accessible?
 - What support, clarification or examples are needed?
- **Ensure accessible information provision:** Ensure that all relevant documents (policy documents, guidelines, FAQs) can be found on the intranet or the LMS used (e.g. Magister, Somtoday, Canvas, Brightspace) and use multimedia communication strategies to make the information accessible to all target groups. This includes interactive FAQs, video tutorials, decision trees, student portal, newsletters, AI hub, staff handbooks with sample cases and rubrics. The guideline serves as a checklist for students, as it allows them to check for every assignment whether their intended AI use complies with the rules. For teaching staff, it offers guidance for advising students and being consistent themselves. Greater transparency in this area contributes to reliability as well as legal certainty in assessments.

Checklist Step 3: Transparency & communication

- Guides/manuals on AI use, accountability and procedures provided in understandable language and distributed to all stakeholders.
- AI rules and guidelines routinely included in assessment information and assessment assignments.
- Specific instructions on possible AI use provided to programme teams and communicated to students.
- Formats and templates for assessment design and validation updated with AI checks (so AI permission and safeguards are considered for each new assessment).
- Communication through different channels targeted to different audiences that are accessible and easy to find.

STEP 4

Continuous professional development and expertise

Purpose: Ensure ongoing professional development in terms of up-to-date knowledge and understanding of technological, legal and ethical AI developments so that all those involved have sufficient competence in dealing with AI-related matters.

Actions (organisational):

- **Training and knowledge networks:** As an examination board, keep abreast of current developments and actively participate in available training courses on technological, ethical and legal developments in AI in the area of assessment and examination. Suggestions include:
 - In the Netherlands, organisations such as SURF, Npuls, MBO Digitaal, the Netherlands Association of Universities of Applied Sciences (VH) and Universities of The Netherlands (VSNU) regularly provide professional development activities and sessions to share knowledge and experiences.
 - Read relevant literature, stay up-to-date on legal and technological developments and review ethical guidelines. These insights can inform both policy and practice.
- **Set up an expert pool or focus group:** Consider bringing together experts and experienced professionals in, for example, an AI taskforce or steering group that can facilitate rapid collaboration and dialogue on urgent and/or strategic AI-related quality and assurance issues. Such a group could represent various disciplines – IT specialists, legal experts, teaching staff and/or students. The purpose of this kind of focus group is to consult, share knowledge and anticipate developments that may have consequences for policy and procedures. Moreover, it contributes to broadly supported approaches and solutions.

- **External and internal learning networks:** Encourage participation in learning networks for examination board members, – both internally and externally – across programmes, institutions and sectors. In the Netherlands, there are numerous initiatives and platforms through MBO Digitaal, UNL, VH, Npuls, SURF, the Assessment Competence Network, the Learning from Assessments Platform and other alliances. Participating in and contributing to learning networks enhances consensus in the field and ensures that each institution remains aligned with the national agenda.

Checklist Step 4: Professional development

- Examination board members possess basic qualifications in assessment and examination;
- Professional development objectives and budgets for the examination board have been set;
- The knowledge management system is operational: The examination board has access to up-to-date information/resources and participates in at least one national network;
- Collaboration structure has been established with assessment experts, legal-ethical experts and technology developers for advice, consultation, analysis of current developments and complex issues, as well as knowledge sharing and input for annual policy and procedure evaluations.

STEP 5

Safeguard the authenticity of student performance

Purpose: Ensure reliability, validity and transparency regarding the authenticity of student performance so that assessment quality and qualification value are maintained, even with widespread use of AI.

Actions (operational/assessment design):

- **Organise controllable assessment, use supervision where appropriate and do so judiciously:** A mix of assessment methods is the most effective way of safeguarding authenticity of student effort and performance. Examples include process-oriented assessment, such as portfolio assessment with intermediate products or oral verifications in the form of individual defences, criterion-based interviews or short presentations. Unique, context-dependent assessment assignments also contribute to authenticity, as do observation and online proctoring. In a balanced assessment programme, summative assessments and formative assessments are designed and compiled in a meticulous manner. One of the most effective strategies for reducing undesirable and prohibited AI use are assessment types where AI literacy – based on the learning objectives, is part of the assessment. By making AI use visible throughout learning processes and in the demonstrated output, AI is used purposefully and responsibly, and inappropriate use is discouraged.

Examples of combinations of assessment methods from practice include: “practical assessment + process log criterion-based interview”, “case analysis + presentation + peer assessment”, or “knowledge test + OSCE + portfolio + 360-degree feedback”.

- **Be transparent about and take due care with privacy:** Announce monitoring measures clearly and ensure they are proportionate. In line with the principles of the Netherlands AI Coalition (NLAIC, 2023) and the AI Act (2025), every means of technical verification should be assessed for its privacy impact: avoid unnecessary data collection and adopt less intrusive measures wherever possible. Please note: in some cases strict supervision may adversely affect trust and student wellbeing, so this is a tool that must be used sparingly and judiciously.
- **Integrate authenticity safeguards into regular quality assurance:** Ensure that authenticity is included in the formal quality assurance of assessments and exams:
 - Plan: For each assessment, perform a risk analysis for AI sensitivity;
 - Do: Implement safeguards;
 - Check: Conduct random checks for authenticity (10% of high-risk assessments);
 - Act: Make adjustments based on findings;
 - Add items to regulations and validation forms that clarify which measures have been taken to ensure the authenticity of student performance ;
 - Include “authenticity of student performance” as a criterion when conducting random file checks or assessment reviews. This ensures that programmes can take any necessary measures proactively.

Sector-specific suggestions:

- Vocational education and training: Use competency tests or practical assessments with unexpected variations. Strengthen collaboration with training companies for authentic assessment and involve partner companies in the process.
- Higher professional education: Use professional practices and products with a unique context. Have students work with local and up-to-date data, for example. Integrate reflective dialogues into evaluation processes.
- Research-oriented education: Focus on research integrity and methodological accountability, for instance by requesting lab journals with timestamps or making development visible and measurable on the basis of version history. Implement open science practices (e.g. preregistration, open data).

Checklist Step 5: Authenticity & assessment methods

- In designing or redesigning assessments, demonstrable and explicit consideration has been given to AI-aware practices, resulting in a balanced assessment programme that safeguards authenticity of student effort, student output and the quality of assessment;
- Additional verifications – oral or otherwise – and mixed methods are built in for assignments where there is a high risk of outsourcing and/or prohibited AI use;

- A supervision plan is drawn up for relevant assessments, including communication to students and consideration of privacy (with a DPIA performed where necessary);
- Regulations and validation forms are adjusted and implemented. These forms include questions about determining AI-use, the way it is used and authenticity safeguards;
- Protocol for random checks by examination boards has been updated: authenticity checks are a standard component where needed or desired;
- Signs of effects that undermine the value of diplomas or qualifications are addressed on the basis of the current approach. In case of doubt, formulate additional measures.

Conclusion

This guide for examination boards aligns with the Dutch national vision on AI in assessment and examination, which asserts that human-centred, valid and fair assessment and examination remains possible even in the age of AI, provided all parties collaborate towards achieving this goal. Examination boards play an important role through their safeguarding function by establishing final qualifications, ensuring assessment quality and integrity and protecting the value of qualifications. They must be able to trust that assessments are designed so that required knowledge, skills and competencies can genuinely be developed and ascertained.

In these AI-aware assessment practices, examination boards must adopt a holistic, adaptive and ethically responsible approach to assessment and examination. Human expertise should be combined with AI-driven assessment tools, frameworks must be updated to include AI competencies and ongoing stakeholder involvement and professional development must be guaranteed. With the guidance and step-by-step plans provided here, examination boards in vocational education and training, higher professional education and research-oriented education can take concrete, substantiated steps to fulfil their duties and responsibilities.

A consistent and coherent approach is essential. This applies when it comes to establishing clear frameworks, procedures and policy and providing clear communication on these items. It also applies to researching and designing/redesigning AI-driven assessment and implementing this within legal frameworks. Ongoing professional development for examination boards and focus on collaboration are also essential. Examination boards face a major and complex task, and collaboration is in everyone's interest. Be sure to share experiences and best practices with examination boards at other institutions, industry associations and developers to stay abreast of effective AI assessment strategies and uniform interpretations of Dutch as well as European legislation and regulation.

This guide is not an end point but a point of departure. Its key message is clear: responding to both the challenges and opportunities offered by AI results in assessment policy that is well-considered, practically applicable in everyday assessment and examination and can be safeguarded by examination boards. Through cross-sector collaboration, ongoing professional development and a proactive approach, we can safeguard the quality of assessment and examination in the age of AI. This way, we maintain trust, validity and, above all, the value of Dutch qualifications.

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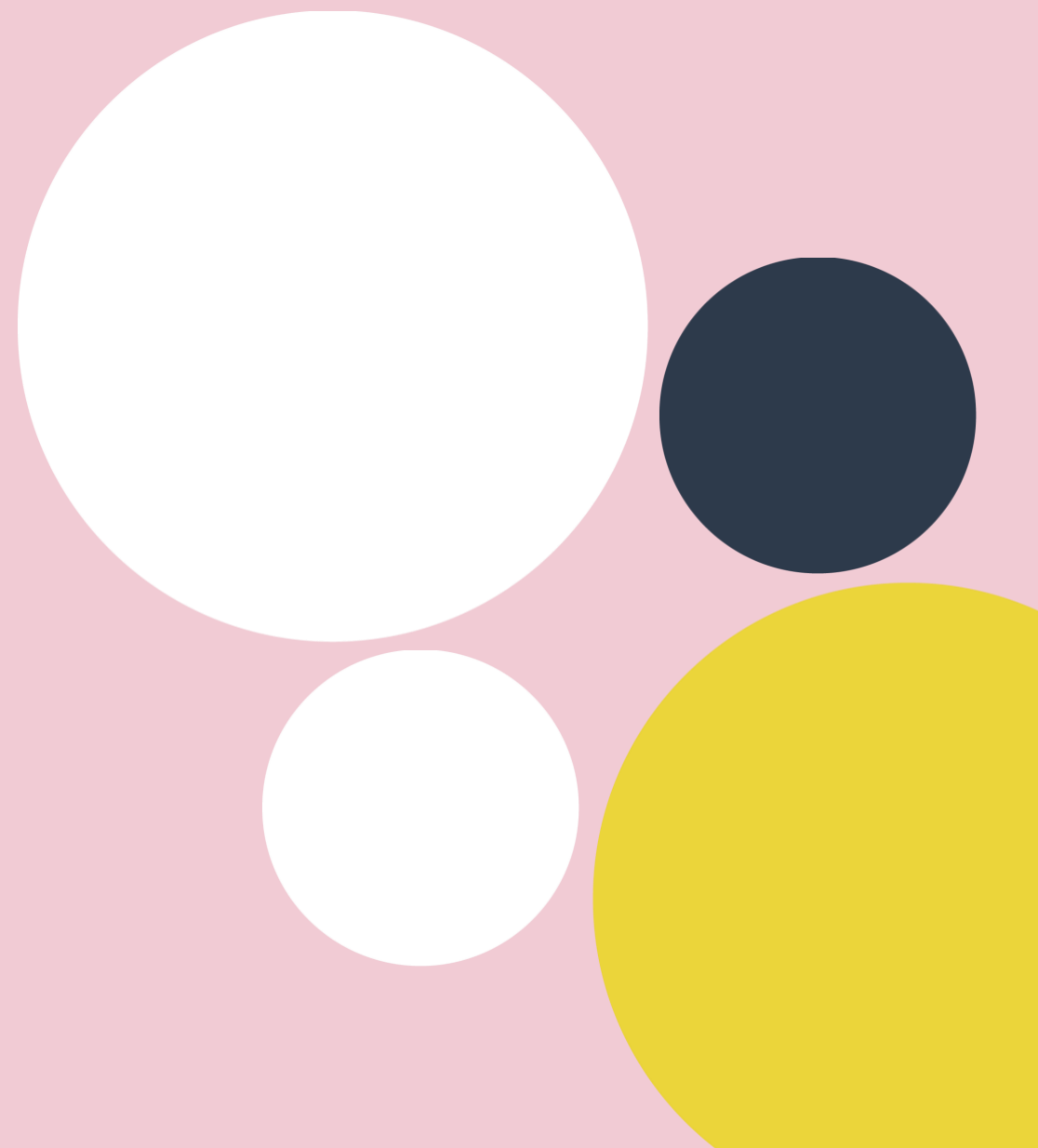
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Annex 1: Checklist summary

Focus area	Actions	Check
Policy	• AI guidelines and agreements included in regulations (OER/examination plan). • Definition of permitted versus prohibited AI use/tools is clear. • Definition, compliance and enforcement of AI misuse/fraud explicitly laid down. • Examples of AI use per assessment method elaborated (interpretive support for teaching staff/students). • Communication to programmes: everyone informed of new/amended policy.	✓ ✓ ✓ ✓ ✓
Organisation & Processes	• Protocol for AI use and detection established (including requirements and privacy). • Adjustments to procedures for handling fraud in AI cases established and shared. • Clear internal communication channels: teaching staff know who to contact for AI questions or reports. • Documentation/registration of AI incidents (for ongoing improvement).	✓ ✓ ✓ ✓
Communication & Transparency	• Guidelines/information provided to students. • Teaching staff informed and instructed about rules, agreements and disclosure of AI use in assessment. • AI user statement integrated in assessment assignments and/or submission systems. • Templates and forms updated with AI information (assessment matrix, validation).	✓ ✓ ✓ ✓
Professional development	• The examination board has up-to-date knowledge and insights regarding technological, legal and ethical developments, frameworks and guidelines (attending sessions/training). • There is access to internal or external expertise for complex AI cases. • Evaluation moments regarding policy and approaches are included in quality cycles. • The examination board shares lessons learned with peer institutions (e.g. through networks or publications).	✓ ✓ ✓ ✓
Authenticity & Assessment	• High-risk assessment methods identified (and adjusted or extra safeguards built in as required). • Extra verification built in where necessary. • Preventive measures (e.g. process documents, interim feedback) implemented where relevant. • Quality control expanded: authenticity of student output is checked for all assessments (in design and evaluation stages).	✓ ✓ ✓ ✓





Onderwijs
bewegen.