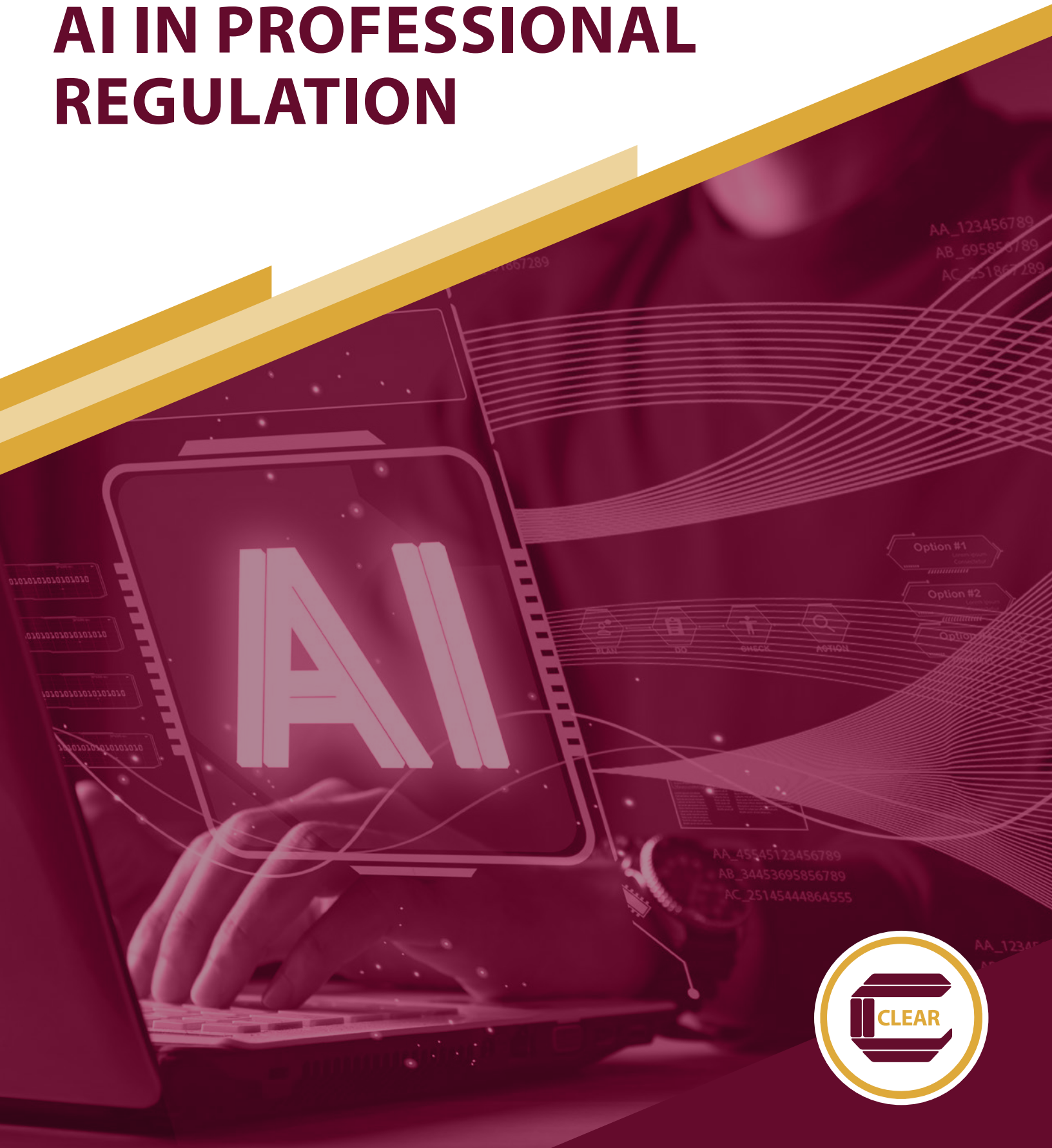
CLEAR PRINCIPLES FOR ETHICAL AND EFFECTIVE AI IN PROFESSIONAL REGULATION



CLEAR Launches the Principles for Ethical and Effective AI in Professional Regulation

CLEAR is pleased to announce the release of the CLEAR Principles for Ethical and Effective AI in Professional Regulation, a new high-level framework designed to support regulators as they navigate the opportunities and risks created by artificial intelligence.

AI is rapidly reshaping how professional services are delivered, assessed, and overseen. Regulators across the world are exploring how to integrate new technologies while maintaining public trust, professional competence, and fair, transparent oversight. The CLEAR Principles provide values-driven guidance that can be adapted across jurisdictions, regulatory models, and resource levels. They are not rules. They are practical guideposts to support safe, responsible, and meaningful use of AI in professional regulation.

THE PRINCIPLES FOCUS ON THREE STRATEGIC COMMITMENTS.

Professional competence. Human-centered ethics. Trust through oversight.

Together, they offer a foundation regulators can use to inform policy development, operational decisions, and conversations with governments, education providers, and the public.

In the year ahead, CLEAR will build on this work by providing training, webinars, case studies, and additional resources to help members understand, adapt, and apply the Principles in their own regulatory context. This ongoing program will draw on global expertise and the experience of CLEAR's diverse membership.

As AI technologies continue to evolve, CLEAR remains committed to supporting regulators with timely, practical, and internationally informed guidance. The Principles mark the beginning of this next phase of work and reflect CLEAR's continued leadership in advancing excellence in professional regulation worldwide.

The full CLEAR Principles are available in the following pages. CLEAR looks forward to engaging with its members and partners as this work develops.

INTRODUCTION

Artificial intelligence is transforming how professional services are delivered, evaluated, and regulated. From diagnostic tools in healthcare to automated exam scoring, AI introduces new capabilities and new risks. For regulators across the world, the question is no longer if AI will influence professional regulation. It is how we ensure it strengthens rather than undermines public trust, competence, and ethical oversight.

These principles were developed by the Council on Licensure, Enforcement and Regulation and adopted at its 2024 Annual Educational Conference in Baltimore. They provide high-level, values-driven guidance that can be adapted across jurisdictions, professions, and regulatory traditions. They are not rigid rules. They are strategic, practical guideposts to help regulators respond to a fast-changing technological landscape with clarity and integrity.

These principles are designed to be applied flexibly across legal systems, regulatory models, and resource levels, allowing each jurisdiction to adapt them to its own context.

Why Now?

Recent international events show the consequences when AI is deployed without human-centered design or proper oversight. For example:

A medical helpline chatbot in the United States generated responses that experts warned could be harmful to individuals with eating disorders.

An algorithm in the United Kingdom downgraded thousands of students based on school reputation instead of individual performance.

Scandals such as Cambridge Analytica revealed how opaque algorithms can damage democratic trust and public confidence.

These cases are illustrative. Situations may differ by jurisdiction and profession.
Yet the underlying vulnerabilities remain consistent.

The CLEAR Principles

THE CLEAR PRINCIPLES ARE BUILT ON THREE STRATEGIC COMMITMENTS:

Professional competence, human-centered ethics, and trust through oversight. They apply across regulatory functions including licensing, monitoring, accreditation, examinations, and complaints.

1. PROFESSIONAL COMPETENCE

AI should only be used within the scope of professional knowledge, skill, and expertise.

What it means

Professionals must understand the AI tools they use. This includes knowing their purpose, limitations, risks, and how outputs should be interpreted. AI may assist decision making, but it cannot replace contextual reasoning, professional judgment, or ethical accountability. Regulators should ensure that licensees can explain how an AI tool informed a decision and identify when its outputs may be inaccurate or inappropriate. Agencies should build appropriate internal capability to assess AI systems through training or expert support.

Why this matters

Over-reliance on AI creates blind spots. When professionals use tools they cannot interpret, automation bias increases and errors go undetected. Competence ensures that AI strengthens practice rather than weakening it.

Case Example

In 2023 the National Eating Disorders Association introduced a chatbot called Tessa to supplement its helpline. Media reports raised serious concerns after the chatbot provided weight related advice inconsistent with clinical guidance. The organization paused the chatbot while it reviewed the issue.

Regulatory Implication

Licensing boards and oversight agencies should require professionals to demonstrate understanding of any AI tools they use. Regulators themselves should invest in training and audit capabilities to ensure staff can interpret AI outcomes.

2. HUMAN-CENTERED ETHICS

AI must support ethical standards and human judgement.

What it means

No decision that affects someone's rights, welfare, or livelihood should ever be made by AI alone. AI can inform evaluations, but humans must retain final decision authority and moral responsibility. This applies across examinations, licensing decisions, disciplinary assessments, accreditation processes, and triage of complaints. AI is an input to ethical judgment, not a replacement for it.

Why this matters

AI systems operate on patterns rather than principles. They cannot understand fairness, compassion, or equity. Without human review, AI may generate outcomes that are technically plausible but ethically unacceptable. Human judgment ensures decisions remain aligned with regulatory values and public protection.

Case Example

In the UK, a national algorithm was used to assign grades after COVID-19 disrupted exams. The algorithm downgraded nearly 40 percent of students, disproportionately harming those from disadvantaged schools. There was no appeal mechanism and no individual assessment. Public outrage followed, and the government was forced to abandon the system.

Regulatory Implication
Boards should build safeguards that require human review of all AI-assisted decisions. This includes examination scoring, disciplinary triage, or licensure approvals. AI should never be the final arbiter.

3. TRUST AND OVERSIGHT

AI systems must be explainable, auditable, and secure.

What it means
No critical regulatory decision should rely on systems that cannot be interrogated or independently verified. Regulators must be able to understand, trace, and verify how AI-supported decisions are generated, even when the underlying model is complex. Regulators should have clear visibility into how AI systems function, what data they use, and how decisions are produced. When full explainability is limited, regulators should require alternative controls such as periodic model testing, bias monitoring, performance validation, stress testing, and independent audits to ensure the system remains trustworthy and reviewable.

Why this matters
Opaque systems undermine public trust, hinder due process, and create unacceptable regulatory blind spots. When regulators cannot trace how an AI-supported decision was generated, they cannot ensure fairness, identify errors, or hold anyone accountable. Lack of explainability also makes appeals impossible and exposes regulators to legal, ethical, and reputational risk. Transparent, auditable systems protect both the public and the integrity of regulatory decisions.

Case Example
The Cambridge Analytica scandal revealed how personal data can be exploited at scale when there are no safeguards in place. While not AI in the strict sense, it showed how powerful algorithms can operate without accountability.

Regulatory Implication
Regulators should require vendors and licensees to document their AI tools, maintain logs, and meet baseline cybersecurity standards. There must be a clear human or organization responsible for any AI-driven action.

Implementation Challenges

Adopting the CLEAR Principles will require adaptation. Some common challenges include:

- **Resource variation.** Smaller regulators may lack technical staff or analytics capacity.
- **Regulatory uncertainty.** Developers may hesitate to innovate without clear expectations.
- **Rapid technological evolution.** AI systems evolve faster than policy cycles.
- **Broad principles.** Values need translation into measurable indicators that support compliance and enforcement.

These challenges are real, yet they are not reasons for inaction. They signal why shared principles matter.

Turning Principles into Practice

1. USE AS A REFERENCE FRAMEWORK

Regulatory bodies can use the CLEAR Principles as a reference framework to guide the development of internal policies, operational processes, and oversight practices related to AI. This supports coherence across jurisdictions while allowing each regulator to tailor the principles to its legal environment, resource capacity, and professional context. The aim is alignment, not uniformity.

2. CAPACITY BUILDING

Invest in training for staff, decision makers, and licensees to ensure that both regulators and professionals understand the design, risks, and limitations of AI systems. Agencies may establish roles such as AI ethics officers, oversight committees, or leverage partnerships with external experts scaled appropriately to the agency's size and mandate.

3. OVERSIGHT AND AUDITS

Require clear documentation, justification, and review processes for any AI used in regulatory workflows. This includes maintaining system logs, monitoring model performance, and ensuring that individuals affected by AI-assisted decisions have clear and accessible routes to challenge or appeal outcomes.

4. COLLABORATION AND DIALOGUE

Encourage cross-jurisdictional cooperation to share lessons, risks, and practical insights. Regulators should communicate transparently with the public about how AI is used in professional oversight and engage with stakeholders to maintain trust as technology evolves.

Conclusion

The CLEAR Principles offer a proactive path for integrating AI into professional regulation with integrity, safety, and purpose. They are not static. They are designed to evolve as technologies and expectations shift.

But what does not change is the core idea: regulators have a duty to uphold trust. AI must never be a shortcut around that responsibility.

By embedding competence, ethics, transparency, and security into our systems from the start, we can ensure that AI serves the public good safely.

Sources

National Eating Disorders Association – Chatbot incident

- Reddy, P., & Reddy, N. (2025). *Preventing Another Tessa: Modular Safety Middleware For Health-Adjacent AI Assistants* [Preprint]. arXiv. https://arxiv.org/abs/2509.07022 (includes case-study of NEDA's "Tessa" chatbot) arXiv
- "NEDA Suspends AI Chatbot for Giving Harmful Eating Disorder Advice." (2023, June 1). WIRED. https://www.wired.com/story/tessa-chatbot-suspended/ ***WIRED***
- "US Eating Disorder Helpline Takes Down AI Chatbot Over Harmful Advice." (2023, May 31). The Guardian. https://www.theguardian.com/technology/2023/may/31/eating-disorder-hotline-union-ai-chatbot-harm ***The Guardian***
- "Artificial Intelligence Tools Offer Harmful Advice on Eating Disorders." (2023, August 28). Harvard T.H. Chan School of Public Health. https://hsph.harvard.edu/news/artificial-intelligence-tools-offer-harmful-advice-on-eating-disorders/ Harvard Chan School of Public Health

UK A-Level Algorithm Grading Controversy

- Harkness, T. (2021, January 11). "A-level results: Why algorithms aren't making the grade." ***ScienceFocus***. https://www.sciencefocus.com/future-technology/a-level-results-why-algorithms-arent-making-the-grade Science Focus
- "Almost 40% of English students have A-level results downgraded." (2020, August 13). The Guardian. https://www.theguardian.com/education/2020/aug/13/almost-40-of-english-students-have-a-level-results-downgraded ***The Guardian***
- Bennett, S. (2020). "On A Levels, Ofqual and Algorithms." Sophie Heloise Bennett blog. https://www.sophieheloisebennett.com/posts/a-levels-2020/ sophieheloisebennett.com
- "The 2020 GCSE and A-level 'exam grades fiasco'." University of Bristol Research. https://www.bristol.ac.uk/cmm/research/grade/ University of Bristol

Cambridge Analytica Data Scandal (2018)

- Cadwalladr, C., & Graham-Harrison, E. (2018, March 17). *Revealed: 50 million Facebook profiles harvested for Cambridge Analytica in major data breach.* ***The Guardian.*** https://www.theguardian.com/news/2018/mar/17/cambridge-analytica-facebook-influence-us-election
- Granville, K. (2018, March 19). Facebook and Cambridge Analytica: *What you need to know as fallout widens.* ***The New York Times.*** https://www.nytimes.com/2018/03/19/technology/facebook-cambridge-analytica-explained.html
- Federal Trade Commission. (2019, July 24). *FTC imposes $5 billion penalty and sweeping new privacy restrictions on Facebook.* ***FTC Press Release.*** https://www.ftc.gov/news-events/news/press-releases/2019/07/ftc-imposes-5-billion-penalty-sweeping-new-privacy-restrictions-facebook

1. Rosenberg, M., Confessore, N., & Cadwalladr, C. (2018, March 17). *How Trump consultants exploited the Facebook data of millions.* ***The New York Times.*** https://www.nytimes.com/2018/03/17/us/politics/cambridge-analytica-trump-campaign.html

General risk of AI tools in sensitive contexts

- "What does a chatbot know about eating disorders? Users of a helpline are about to find out." (2023). MMM-Online. https://www.mmm-online.com/home/channel/what-does-a-chatbot-know-about-eating-disorders-users-of-a-helpline-are-about-to-find-out/ mmm-online.com
- "A-Level results: Why algorithms aren't making the grade." (2021, January 11). ScienceFocus. (See above) ***Science Focus***