



CDDH(2025)R103 Addendum 1
24 November 2025

STEERING COMMITTEE FOR HUMAN RIGHTS (CDDH)

COMMENTS ADOPTED BY THE CDDH¹ ON RECOMMENDATION OF THE PARLIAMENTARY ASSEMBLY

[2300 \(2025\)](#) – Artificial intelligence and migration

¹ At its 103rd meeting, 24–27 November 2025.

Recommendation [2300 \(2025\)](#) of the Parliamentary Assembly – Artificial intelligence and migration

1. Noting the rapid advancement of artificial intelligence (AI) in migration management as in other areas, the Parliamentary Assembly recommends that the Committee of Ministers encourages the signature, ratification and implementation of the Council of Europe Framework Convention on Artificial Intelligence and Human Rights, Democracy and the Rule of Law (CETS No. 225) by all member States and other States.
2. In light of Resolution 2628 (2025) “Artificial intelligence and migration”, the Assembly urges the Committee of Ministers to prepare a recommendation guiding member States on the use of AI in migration management, followed by concrete actions that prioritise transparency, accountability and human rights protection.
3. The Assembly urges the Committee of Ministers to ensure that migration-related policy instruments incorporate strong and enforceable safeguards and calls for the establishment of a code of good practice on the use of AI in migration management and in procedures affecting the rights of migrants, refugees and asylum seekers, which could form part of the above recommendation.
4. The Assembly recommends that the Committee of Ministers plans – within the Council of Europe – awareness-raising programmes on the implications of AI in migration management for ombudsman institutions and equality bodies. These activities should strengthen their capacity to safeguard human rights. Similar awareness raising and training should be rolled out for migration officers, caseworkers and NGOs; the Council of Europe HELP programme (Human Rights Education for Legal professionals) and the EU Digital Europe Programme may be useful instruments in this respect.
5. The Assembly recommends strengthening co-operation with all the relevant bodies and agencies of the European Union and the United Nations on the application of AI in migration management. It emphasises also the importance of co-operation between the Council of Europe and civil society on this question, which would be particularly valuable in the design of any forthcoming instruments.

CDDH COMMENTS

1. The CDDH takes note of Parliamentary Assembly Recommendation 2300 (2025) “Artificial intelligence and migration”.
2. As regards the proposal in paragraph 2 of Recommendation 2300 (2025), that the Committee of Ministers prepare a recommendation guiding member States on the use of AI in migration management, the CDDH recalls its preparation of a Handbook on Human Rights and Artificial Intelligence. The Handbook is intended as an accessible tool primarily to support government officials and policymakers in Council of Europe member States in applying the standards of the European Convention on Human Rights (ECHR) and the European Social Charter (ESC) and other human rights standards to the use of artificial intelligence (AI). As a practical resource, it provides insights into how these standards, along with instruments like the Framework Convention on artificial intelligence, human rights, democracy and the rule of law, may apply to activities in AI systems’ lifecycle. Focusing on key AI use cases in public governance, both current and reasonably foreseeable, it offers a framework to assess AI’s human rights impacts, considering ECHR and ESC standards.

3. One of the sectors of public governance covered by the Handbook will be the use of AI in the context of immigration and border control. Having identified relevant general legal principles, human rights issues, and certain specific AI use-cases in this context, the Handbook gives particular attention to the issues of privacy and data protection, non-discrimination, and the right to an effective remedy.
4. The CDDH adopted the Handbook at its 103rd meeting on 24 – 27 November 2025.