



Practical prompt checklist for ethical challenges involving AI use.

This checklist is designed to help members navigate ethical challenges, concerns or judgement involving the use of AI. It's a practical prompt tool to help individual professional accountants consider how AI use may affect compliance with the fundamental principles – providing prompts to support reflection, further review, and documentation.

In particular, AI use may affect integrity, objectivity, professional competence and due care, confidentiality, and professional behaviour – as well as human accountability for the final advice, decision or output. It should be used alongside the ethical decision-making approach in the [Toolkit](#). Where AI use forms part of the matter, see the Toolkit steps [2](#), [3](#) and [10](#).

IESBA have published thought leadership on [Emerging Technologies](#), which highlights how features such as opacity, non-determinism, data dependence, autonomy, speed and scalability can create or amplify threats to compliance with the fundamental principles. Where relevant, the ethical assessment should also consider the combined effect of connected technologies, data sources, automation features, and human workflow dependencies.

It is not a separate process, a substitute for the IESBA Code, applicable laws and regulations, internal policies, or professional judgement. It is also not an organisational AI governance review or enterprise risk assessment.

Example: *An accountant uses AI to summarise a technical accounting issue and drafts advice for a client based on that summary. The ethical challenge is not merely that AI was used, but whether the characteristics of the tool or system affect the reliability, explainability, consistency, accountability, or appropriateness of relying on the output. It is also that AI use may affect whether:*

- *the advice provided to the client is accurate and supportable*
- *independent judgement and scepticism have been applied*
- *the output has been properly checked and understood*
- *sensitive information has been handled appropriately*
- *the accountant can stand behind and explain the final advice.*

This checklist complements ACCA's earlier guidance –



[AI Monitor: Shining a light on AI's ethical threats for finance professionals](#) – by focusing more specifically on live ethical matters where AI use is involved and therefore may affect judgement, evidence, reliance, or accountability.

1. Context and reliance

Prompt	Yes	No
AI is being used in drafting, analysis, recommendation, decision support, reporting, or evidence gathering in this matter.	☐	☐
The AI output is influencing a significant judgement, decision, or external communication.	☐	☐
The level of reliance on the AI output is more than low-risk background support.	☐	☐
Additional legal, regulatory, professional, sectoral, or internal policy considerations may apply to this use of AI.	☐	☐
The matter may involve more than one connected technology, dataset, automation feature, or workflow dependency, and that combination may affect the level of ethical risk.	☐	☐

If yes: make sure the purpose, level of reliance, combined technology context, and applicable requirements are clear and documented before proceeding.

2. Understanding and explainability

Prompt	Yes	No
I do not understand, to an appropriate extent, how the tool or system produced this output.	☐	☐
I cannot clearly explain why it is appropriate to use this output for this purpose.	☐	☐
If challenged, I could not justify the extent of reliance being placed on this output.	☐	☐
The output may vary or change without an obvious reason that I can understand or explain.	☐	☐

If yes: reduce reliance, seek clarification, or obtain review and document before using the output further.

3. Verification and evidence

Prompt	Yes	No
I have not checked the output against source material, professional guidance, or other evidence.	☐	☐
I have not tested the facts, references, calculations, summaries, or recommendations that matter to the decision.	☐	☐
The output looks polished, confident, or plausible, but I cannot show that it is accurate and supportable.	☐	☐
There is a risk of bias, inconsistency, hallucination, or unexplained variation in the output.	☐	☐
The output may be materially shaped by the quality, completeness, provenance, or bias of the input data or underlying data sources.	☐	☐

If yes: verify the output, test the basis for the result, document further work and do **not** rely on appearance or fluency as evidence of quality.

4. Fundamental principles: Integrity

Prompt	Yes	No
The output may be false, misleading, incomplete, or unfairly presented.	☐	☐
I may be asked to be associated with information or a conclusion that I do not believe is supportable.	☐	☐
The output does not align with the evidence or the real position as I understand it.	☐	☐

If yes: challenge the content, obtain further evidence, document process and do **not** be associated with information that may mislead.

Objectivity

Prompt	Yes	No
Convenience, speed, pressure, incentives, or familiarity with the tool may be affecting my judgement.	☐	☐
I may be relying on the tool instead of applying my own judgement and scepticism.	☐	☐
Bias in the model, the data, or my own assumptions may be influencing the outcome.	☐	☐

If yes: test objectivity carefully, seek independent challenge where needed, document process and consider safeguards.

Professional competence and due care

Prompt	Yes	No
I do not have enough understanding, skill, evidence, time, or support to use this output properly.	☐	☐
I have not taken the steps needed to verify, challenge, or retest the output.	☐	☐
The tool may not be fit for purpose for this task.	☐	☐

If yes: do more work before proceeding, including verification, documentation, retesting, consultation, or obtaining appropriate support.

Confidentiality

Prompt	Yes	No
There may be confidentiality, privacy, security, or data-use concerns in the way the tool is being used.	☐	☐
I do not know whether sensitive, personal, client, or organisational information is being handled appropriately.	☐	☐
This use of AI may expose information in ways that are not permitted, controlled, or understood.	☐	☐

If yes: stop and check the data handling position and document process before continuing.

Professional behaviour

Prompt	Yes	No
This use of AI may create legal, regulatory, policy, contractual, or professional conduct concerns.	☐	☐
I would be uncomfortable if this use of AI had to be explained to colleagues, clients, regulators, or other stakeholders.	☐	☐
Human accountability for the final advice, decision, or output is unclear.	☐	☐

If yes: clarify accountability, consider escalation, and do **not** proceed on an unclear basis.

5. Oversight, review and escalation

Prompt	Yes	No
Relevant approvals, review arrangements, or oversight mechanisms are not in place.	☐	☐
The checks and controls may not be proportionate to the level of risk and reliance.	☐	☐
This use may fall outside normal internal approval, restricted-use, monitoring, or documentation requirements.	☐	☐
I may need additional review, consultation, or escalation before relying on the output.	☐	☐
The pace, volume, or scale of the system’s outputs may make meaningful human review harder in practice.	☐	☐

If yes: obtain review, consultation, approval, or escalation before proceeding.

What to do next

If one or more answers are **Yes**, consider the following:

- Have I verified the facts and sought sufficient evidence?
- Have I applied professional scepticism and tested whether bias, pressure, or over-reliance is affecting judgement?
- Do I need safeguards, consultation, independent review, or escalation?
- Should reliance on the output be reduced, limited, or discontinued?
- Have I documented the issue, the checks performed, the ethical judgement exercised, and the reasons for the action taken?

Final reminder:

‘AI and other emerging technologies do not remove professional ethical responsibility to apply the fundamental principles. Where the characteristics of a tool or system make outputs harder to explain, verify, monitor or challenge, reliance should be reduced, further safeguards applied, or the matter escalated.’