SEMINAR ORGANISED BY THE ITALIAN COUNCIL OF STATE IN
COLLABORATION WITH THE HELLENIC COUNCIL OF STATE AND ACA-EUROPE
Turin, 23-24 November 2026

Technological challenges, with particular attention being paid to the introduction of digital technology and artificial intelligence into the organisation of the administration and administrative justice

QUESTIONNAIRE

Responses from the Curia of Hungary

This questionnaire has been prepared in anticipation of the seminar to be held in Turin on 23 and 24 November 2026. In accordance with point 2 of the guiding principles adopted by the Hellenic Presidency of ACA-Europe, it aims to explore the current challenges facing administrative judges, particularly those related to technology, and more specifically the introduction of digitalisation and artificial intelligence into the organisation and functioning of the administration and administrative justice.

In order to gain an in-depth understanding of the various dimensions of these technological challenges, the survey is split into three parts:

Part A - The digitalisation of administrative proceedings, with a focus on the experience of various supreme administrative jurisdictions and the impact of this transformation on the organisation and conduct of judicial activity.

Part B - Automated administrative decision-making and judicial review by administrative courts, particularly issues of technical discretion, automation and the delimitation of judicial powers.

Part C - The role of the administrative judge and the use of artificial intelligence in the performance of judicial functions and in the decision-making process, particularly in light of Regulation (EU) 2024/1689, known as the 'AI Act', as well as other European Union standards and regulations, such as Regulation (EU) 2016/679, known as the 'GDPR', Regulation (EU) 2022/2065, known as the 'DSA', and Regulation (EU) 2022/1925, known as the 'DMA'.

Part A

The digitalisation of administrative proceedings and the use of artificial intelligence tools by the administrative justice system

A.I – Infrastructure and technological organisation

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A.I.1 – Digital equipment and resources

1. What is the level of digital equipment available to judges and administrative staff?

☐ Non-existent
☐ Limited
☐ Intermediate
☐ High
☒ **Complete**
Please explain if necessary:

Judges are provided with all digital devices necessary for remote working (except cell phones). Remote working for judicial staff is limited and depends on the digital devices provided to them on an individual basis.

2. Is the technological infrastructure (networks, servers, equipment, connectivity) suited to the day-to-day operational needs of the administrative jurisdictions?

☐ Strongly disagree
☐ Somewhat disagree
☐ Neither agree nor disagree
☐ Somewhat agree
☒ **Strongly agree**

Please explain if necessary:
Organizational digital signatures are ensured but only company registry judges are provided with individual digital signatures.

A.I.2 – Cloud solutions, remote access and interoperability

3. To what extent does your jurisdiction use cloud-based solutions for its information systems?

☒ **Not at all**
☐ To a limited extent
☐ Moderately
☐ Extensively
☐ Completely
Please explain, where applicable, and, in the absence of cloud solutions, specify the alternative infrastructure solutions implemented:

3a. Do the adopted technical solutions enable judges and staff to perform their duties remotely using the institutional equipment made available to them? If so, please specify any limitations.

Yes, they do. Through the central services provided by the National Office for the Judiciary (hereinafter referred to as the "NOJ"), the IT Department can provide remote

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access to the IT network for users of the Curia of Hungary via an encrypted VPN connection for work purposes and based on a written request.

Users can access the same IT resources and data (for instance, network drives, emails) as they would in their workplace environment. Access may be temporarily revoked if a security risk arises. Restrictions on remote access: remote access is prohibited from public computers; remote access is only permitted with a functioning personal firewall and antivirus software; activities unrelated to current work are prohibited during remote access; and if there is any remote client hardware, the use of other VPN or Internet connection is prohibited while using the installed VPN connection.

3b. Are the applications being used interoperable with other national or cross-border judicial IT systems? If so, please specify the extent of this interoperability.

The judicial IT systems have been connected to the Central Government IT Service System (KKSZB in Hungarian). This means that electronically accessible public registers are connected online with the judicial IT systems. The aim of this is to provide uniform, direct access to data from public registers in all cases. The registers that are currently available through the Central Government IT Service System include databases such as the company register, the personal data and address register, the register for sole proprietorship, the travel document register, the driver's license register, the register for the verification of imported vehicles, and the real estate register. Control mechanisms built into the processes ensure that data queries are purpose-specific and that data processing complies with the rules of the General Data Protection Regulation.

A.II – Digitalisation and dematerialisation of judicial administrative proceedings

A.II.1 – Dematerialised administrative proceedings

4. Is a dematerialised judicial administrative proceedings system in place within your jurisdiction?

☐ No
☐ Yes, at an initial stage
☐ Yes, at an intermediate stage
☐ Yes, at an advanced stage
☒ **Yes, on a fully integrated basis**
Please explain if necessary:

In Hungary, digitization developments affecting the field of justice have been in progress for many years. As part of this, the Judicial Integrated Information Technology System (the BIIR in Hungarian) was developed and is a piece of approved document management software designed to support court administration, adjudication, and decision-making processes. The BIR-O subsystem is part of the Judicial Integrated Information Technology System. It is a computer application supporting the adjudicatory activities of courts and covers the management of criminal, civil, labour, economic, administrative, misdemeanour, penitentiary, and enforcement-related contentious and non-contentious proceedings. It also includes a customer relations module (the ÜKE in

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Hungarian) that enables electronic communication as specified in procedural law, making it suitable for tracking court cases and their digitized documents to this day. Furthermore, with the help of this module, the electronic delivery of court documents can also be checked.

The Adjudication Support System (the ÍTR in Hungarian) is linked to the BIR-O subsystem and aims to make judicial work more efficient. The systems that form part of the Adjudication Support System are the anonymization program, the court decision editor, and the Central Government IT Service System query, while other systems that increase the efficiency of adjudication are also connected to the Adjudication Support System such as the Office Filing System (the LIR in Hungarian). Thanks to this, the Client Relations Office can provide access to documents even if they are located in another court.

The full e-file system – that is, electronic access to court documents – is operational in civil, economic, labour, and administrative lawsuits filed since 1 January 2020. This system allows for the complete digitization of court files, electronic access to documents for judges, and the online viewing of court documents for clients, from any location, 24 hours a day, and without time or geographical restrictions.

In administrative adjudication, it is a requirement that all paper-based documents must be digitized and that digitized documents are considered "official" documents.

4a. When this system exists at least at an initial stage, do judges and staff process and sign documents exclusively in digital format in their everyday working practice?

☐ Never
☐ Rarely
☐ Occasionally
☐ Frequently
☒ **Always**

Please explain if necessary:

The BIR-O system enables the tracking of court cases and their digitized documents, and also allows for the verification of the electronic delivery of court documents. The e-file system enables the complete digitization of court files, electronic access to documents for judges, and online viewing of court documents for clients, anywhere, 24 hours a day, without time or geographical restrictions. Please see answer to question 4; organizational digital signatures are ensured but only company registry judges are provided with individual digital signatures.

4b. Percentage of paper files prior to the implementation of dematerialised administrative proceedings that have been digitised:

☐ 0–20%

☐ 20–40%

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☐ 40–65%

☒ **60–80%**

☐ 80–100%

A.II.2 – Digital services for members of the public, lawyers and public authorities

5. Are digital services available for filing documents, consulting files, notifications, payments or other related services? If so, please specify which ones.

Yes. They are available for clients, in cases launched after 1 January 2020, through the System for Client Access to Documents (ÜIR in Hungarian), which provides free access to documents generated in ongoing court cases without the need for personal presence. All that is required is an internet connection and, of course, the approval of the connection request after identification.

In the case of electronic communication, the submission and its attachments should be submitted using the form provided for this purpose, which is available to everyone on a public interface.

6. Do these digital services guarantee an adequate level of accessibility for people with disabilities?

☐ 0–20%

☐ 20–40%

☐ 40–65%

☐ 60–80%

☒ **80 - 100%**

7. Are lawyers involved in the design, development and implementation of digital platforms and tools intended for their use?
If so, please specify the terms of this involvement.

No information is available to answer this question.

8. Are there any support and training measures in place for users outside the court system (lawyers, members of the public, government agencies) regarding the use of the digital tools available to them?

No information is available to answer this question.

☐ YES
☐ NO

If so, please specify which ones

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A.III – Security of information systems and data protection

A.III.1 – Compliance with the regulatory framework

9. Do your jurisdiction's information systems comply with European and national standards on security, data protection and digital preservation?

☐ Strongly disagree
☐ Agree only slightly
☐ Indifferent
☐ Somewhat agree
☒ **Strongly agree**

Please explain if necessary:
The operation of judicial IT systems is governed by state IT security and data protection regulations, including GDPR-compliant data management, the use of closed, authenticated systems, authorization management, logging, and access restrictions. When communicating electronically and using e-file systems, authenticated identification and encryption solutions are used to ensure the integrity of documents and the traceability of access.

A.III.2 – Incident management and business continuity

10. Are IT security incidents dealt with promptly and effectively?
☐ Never
☐ Rarely
☐ Occasionally
☐ Frequently
☒ **Always**

11. Are business continuity and disaster recovery plans regularly updated and tested?

☐ Never
☐ Rarely
☐ Occasionally
☐ Frequently
☒ **Always**

A.III.3 – Publicity and dissemination of court decisions

12. Are court decisions available online in their entirety?

☐ Never
☐ Rarely (only for the most significant decisions)
☐ Occasionally
☐ Frequently
☒ **Always**

Please add any additional information and explain if necessary:

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The Curia shall publish uniformity decisions, decisions issued in uniformity complaint proceedings and in remedy proceedings to ensure legality, its decisions adopted on the merits of a case and quashing decisions; regional appellate courts shall publish their decisions issued on the merits of a case; high courts shall publish their decisions issued in administrative actions on the merits of a case, if the reviewed administrative decisions were adopted in a single instance proceeding and if ordinary remedy is not possible against them, in the Collection of Court Decisions in digital form. The Curia shall also publish those decisions which were not mentioned before, but were issued on the merits of a request for cassation in the Collection of Court Decisions.

In the Collection of Court Decisions
a) court decisions issued in proceedings relating to payment orders, enforcement, company registration, bankruptcy and liquidation, and court registers shall not be published,
b) decisions in matrimonial proceedings, proceedings to establish paternity and descent, proceedings to terminate parental custody, and proceedings to place a person under guardianship shall not be published if any party has requested that they not be published, and
c) decisions in criminal proceedings based on crimes against sexual freedom and sexual morality may not be published if the victim has not consented to their publication in response to a request by the court.
If the decision specified in points b) and c) was issued by the Curia, the number of the decision and the core findings of the legal interpretation contained therein shall be published in the Collection of Court Decisions.

The NOJ Instruction No. 4/2021 (of 12 March 2021) concerns those tasks that courts have to carry out in relation to the anonymization and publication of court decisions. Since 2019, it has been possible to anonymize decisions using software that operates as part of the Adjudication Support System, which was developed as part of the Digital Court Project. During anonymization, metadata related to the decision is recorded, including the parties involved, the designated legal provisions and their status, as well as keywords and a summary of the core findings of the decision (or, in the absence thereof, a brief summary). In accordance with Act CLXI of 2011 on the Organization and Administration of the Courts (hereinafter referred to as the "Courts Act") and the NOJ instruction on anonymization, the process uses both a method of making certain data unrecognizable and the method of generalization. It is not detached from human oversight: in accordance with regulations, anonymization is always approved by the head of the judicial panel before publication (to comply with legal provisions).
Only final anonymized decisions should be published in the Collection of Court Decisions (BHGY in Hungarian), but the parties can access decisions in their own cases through the Adjudication Support System.

13. Where a system for publishing decisions online is in place, is there an internal policy to ensure the protection of personal data and respect for the right to be forgotten?

☐ No

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☐ No formalised policy; anonymisation is carried out by the registry services on a case-by-case basis
☐ No formalised policy; anonymisation is decided on a case-by-case basis on the instructions of judges
☐ Yes, personal data are systematically anonymised
☒ **Yes, personal data are anonymised in accordance with an internal policy providing for targeted exceptions**
☐ Other (please specify)

In administrative proceedings, the name of the defendant is not anonymized; that is, the person who performed the administrative act (made the decision). Decisions in matrimonial proceedings or in proceedings to establish paternity and descent, to terminate parental custody, or to place a person under guardianship shall not be published, and therefore, shall not be anonymized if any party has requested that they not be published.

A.IV – Training and digital skills

14. Does your jurisdiction offer structured and regularly updated digital technology training courses for judges and staff?

If so, please specify which ones.

Yes, it does. Each month, the IT Department of the Curia gives judges and staff advice about the use of information and tools that facilitate IT security. In addition, all employees of the Curia receive a monthly newsletter on data protection containing news, announcements, changes to data protection rules, and conferences published by the National Authority for Data Protection and Freedom of Information.

In Hungary, the operation of the training system falls within the purview of the NOJ President pursuant to Section 76 (7) of the Courts Act. This task is primarily carried out with the help of the Hungarian Academy of Justice (hereinafter referred to as the "MIA") in accordance with Section 171/A of the Courts Act. The training system consists of central training courses organized by the MIA, as well as local training courses and self-study programs. As regards the current plans for 2026, a thematic group entitled "AI at the courts" has been comprehensively formulated as the focus of training courses across several fields of law.

In addition, a postgraduate training course on AI and technology law for judges and court secretaries was announced for the 2025/2026 academic year as part of the Werbőczy Universitas Programme. The programme's aim is to support the performance of judicial administrative tasks and raise the professional standard of adjudication.

A.V – Involvement of judges in digital transformation

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15. To what extent are judges involved in decision-making and design processes relating to technological innovation and digital transformation in the judiciary? If applicable, please provide details.

[In Hungary, there is currently no consultation mechanism that is stipulated by law and requires the direct involvement of courts in the design or introduction of AI tools.].

In Hungary, the digitization of the justice system is taking place with the participation of courts. Between 2017 and 2019, the NOJ ensured, through IT developments within the framework of the so-called Digital Court Project, the technical conditions necessary for the unimpeded functioning of electronic communication between courts and clients, as well as the further development of electronic administration in an optimal, client-friendly manner. The Digital Court Project was designated by Government Decree No. 1287/2017 (of 2 June 2017) and the NOJ was responsible for its implementation. The project exerted an impact in three main areas:

- the development of the publication and anonymization of court decisions;
- the digitization of court proceedings and ensuring electronic access to court records; and
- establishing a connection between judicial IT systems and the Central Government IT Service System.

A series of events called "Digital Open Day" was organized as part of the programme and provided an opportunity for all judges, judicial employees, and heads and representatives of partner authorities in the country to learn about the electronic upgrades that have taken place in the courts in recent years and those that will take place in the future.

With regard to future projects, it can be said that, if justified by the legislative process, the NOJ may involve judges for a fixed period of time – that is, for the duration of the project.

A.VI – Use of AI systems in administrative justice

A.VI.1 – Tools and level of deployment

16. Are artificial intelligence systems currently used to assist in judicial or administrative activities?

AI is currently not part of the operational practice of Hungarian courts. There is no legislation, public law regulatory instrument, government or ministerial strategy or guideline in Hungary that specifically sets out the framework for the application of AI in judicial decision-making. These factors do not yet create the conditions for AI to be effectively and meaningfully integrated into judicial decision-making or the support of administrative processes.

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16a. If so, which ones are used? (Please tick all that apply)

☐ Chatbots

☐ Semantic search tools

☐ Automated anonymisation of decisions

☐ Text analysis and assistance with legal research

☐ Tools to assist with organisation and court management

☐ Other (please specify)

AI is currently not part of the operational practice of Hungarian courts. Administrative proceedings are separate from the aforementioned systems as there is no specifically AI-based decision-making, but only AI-supported decision-making. A detailed answer can be found under questions 1-6.

16b. Overall level of internal deployment of AI systems:

☐ Occasional or isolated use
☐ Trial phase
☐ Development phase
☐ Widespread use
☐ Full integration

Please explain if necessary:

AI is currently not part of the operational practice of Hungarian courts.

A.VII – Governance, regulation and ethical framework for AI

A.VII.1 – Internal guidelines and regulatory compliance

17. Has your jurisdiction adopted any internal guidelines, charters or policies governing the use of AI systems, in particular in application of Regulation (EU) 2024/1689 (the AI Act), the GDPR and other relevant European instruments?

☒ **YES**

☐ NO

If so, please specify which ones.

Act LXXV of 2025 on the implementation of the EU's Artificial Intelligence Regulation in Hungary (hereinafter referred to as the "AI Law") was adopted by the Hungarian Parliament on 21 October 2025. The main provisions of the AI Law entered into force on 1 December 2025 and certain parts of it will become effective as of 2 August 2026. Government Decree No. 344/2025 (of 31 October 2025) on the implementation of AI Law is also related to this.

18. Are AI systems subject to prior risk assessments?
☐ YES

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☐ NO

If so, please specify the terms of these assessments

AI is not currently part of the operational practice of Hungarian courts. AI-supported decision-making by administrative bodies is discussed in questions 1-6.

19. Are there specific requirements in terms of transparency for the use of AI systems? If so, please provide details.

AI is not currently part of the operational practice of Hungarian courts. AI-supported decision-making by administrative bodies is discussed in questions 1-6.

20. Is the use of AI systems accompanied by human oversight mechanisms?

☐ YES

☐ NO

If so, please provide details

AI is not currently part of the operational practice of Hungarian courts, nor is there any AI-based decision-making in administrative proceedings. Regardless of this, in order to ensure compliance with the provisions of the EU's AI Act in Hungary, new bodies have been added to the state organizational system; although these are not directly related to the use of AI in the judicial system, their activities are related to AI-related supervisory powers.

In its Decision No. 1301/2024 (of 30 September 2024), the Hungarian Government decided that the national tasks arising from the AI Act, including market surveillance and notification authority functions, should be performed by an organization under the supervision of the Minister of National Economy. The Hungarian Artificial Intelligence Bureau (hereinafter referred to as the "AI Bureau"), to be established in accordance with the government decision, will ensure that the market surveillance and notifying authorities' tasks that are specified in the AI Act are carried out uniformly within a single organization. The AI Bureau will be established within the organizational structure of the Ministry of National Economy, with the market surveillance authority's tasks being performed by the Ministry of National Economy and the notifying authority's tasks by the National Accreditation Authority under the supervision of the Minister of National Economy.

In February 2025, the government appointed a government commissioner responsible for AI affairs, whose task is to establish the Hungarian Artificial Intelligence Council and direct its work.

21. Are specific methodologies implemented during the design, development and deployment of AI systems to ensure their traceability, reliability, integrity and accuracy? If so, please provide details.

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AI is not currently part of the operational practice of Hungarian courts.

A.VIII – Innovation, prospects and future needs

A.VIII.1 – Current innovation projects

22. Are there any innovation projects currently under way in the following areas? (please tick all that apply)

☐ Process automation
☐ System interoperability
☐ Modernisation of existing systems
☐ Advanced digital services for external users
☐ AI systems
☒ **Other (please specify)**

Government Resolution No. 1403/2025 (of 4 November 2025) on the Further Development of the National Legal Database and the Related LegalAI (AI-based legal support system) constitutes a commitment to the enhancement of the efficiency of adopting and applying laws, the easier navigation of legislation and judicial practice for citizens, the faster overview of cases, and secure access to reliable information through the creation of an AI-based national legal database. The legal database to be developed will be based on the processing of EU legislation, European judicial practice, and national judicial practice.

A.VIII.2 – Barriers to digital transformation

23 What do you consider to be the main barriers to the digital transformation of administrative justice? (please tick all that apply)

☐ Complexity of the regulatory framework
☐ Insufficient financial resources
☐ Lack of specialised human resources
☐ Organisational complexity
☐ Resistance to change and digital skills gap
☒ **Cybersecurity risks and challenges**
☐ Other (please specify)

Currently, AI is not part of the operational practice of Hungarian courts. The primary reasons for this are risks associated with data protection and regulatory uncertainty, which encourage judicial authorities to exercise restraint, particularly in the European legal sphere. In Hungary, there are currently no conditions for AI to be effectively and meaningfully integrated into judicial decision-making or into the support of administrative processes. These factors do not yet create the conditions for AI to be effectively and meaningfully integrated into judicial decision-making or into the support of administrative processes.

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A.VIII.3 – Investment priorities

24. What do you think should be the priority areas for investment over the next few years? (please tick all that apply)

☐ Modernisation of infrastructure
☐ Cybersecurity
☐ Training and skills development
☐ Deployment of AI systems
☐ Interoperability at European level
☐ Complete digitalisation of administrative procedures
☒ **Other (please specify)**

There are no specific court-oriented AI regulations, but reference should be made to Hungary's Artificial Intelligence Strategy (2025-2030). The aim of the strategy is to increase Hungary's competitiveness through the application of AI, while ensuring maximum social and economic benefits. The strategy was renewed as a result of extensive cooperation between government agencies, the Artificial Intelligence Coalition, and representatives of the scientific and business communities. This collaboration guarantees broad support for the strategy and its effective implementation.

The strategy has set objectives of ensuring regulations, a national infrastructure (providing integrated hybrid cloud frameworks, creating coordination tools and reliable marketplaces, and establishing a Hungarian AI Unit), education and skills development, as well as research, development, and innovation.

25. Please describe one or more good practices in digitalisation that have been implemented or are planned within your jurisdiction.

Only the internal database of the courts called "Decision Database", which allows searches by keywords and specific applicable legislation among the decisions of the Curia, Regional Appellate Courts, and High Courts, can be mentioned.

The purpose of the Decision Database is to enable efficient retrieval of court decisions by text and metadata, and to display the metadata and text of the results. The use of the system is monitored, recorded, and logged by the IT Department in order to protect personal data. Two-factor authentication is required to log in, and when using the database, users are required to pay special attention to the enforcement and compliance with the data protection principles set out in the GDPR and the Information Act in order to protect personal data. This interface contributes to the search for and accessibility of case law, thereby supporting adjudicatory activity.

Part B
Automated administrative decisions and judicial review

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B.I – Automated administrative decisions: substantive legality and procedure

1. Are there provisions in your legal system that authorise public administrations to use digital or algorithmic technologies in the exercise of their powers?

☒ **YES**

☐ NO

If so:

1.a. According to these provisions, what are the authorised tools and the objectives pursued by their use?

1.b. What types of acts can be adopted using these technologies?
In particular, is the use of algorithms permitted for the adoption of administrative decisions involving discretionary powers?

Automatic decision-making – which cannot be identified as "purely" AI-based decision-making – aims to create an integrated service that allows administrative procedures to be carried out from start to finish without human intervention, but with the possibility of administrative intervention based on a decision by the organization using the AAD (automatic administrative decision-making) service. In official decision-making processes, replacing human intervention with IT applications contributes significantly to predictable, transparent, and corruption-free administrative procedures.

Section 21 of Act CIII of 2023 on the Digital State and Certain Rules for the Provision of Digital Services (hereinafter referred to as the "Digital State Act") regulates the automatic decision-making process in detail. It should be noted that where an administrative body exercises discretionary powers, there is no place for an automatic decision-making process.

Within this framework, the body responsible for providing digital services may carry out the procedure without human intervention. If clients submit their request electronically, the decision will not require deliberation, and the data necessary for the proceedings will be available in a form suitable for automated processing or will be automatically received. In the case of automated decision-making, the body shall issue decisions that close the proceedings or are necessary for the administration of the case without human intervention, and shall inform the user thereof. The application of automated decision-making may be barred by law or a government decree in the given case.

Act CL of 2016 on General Public Administration Procedures allows administrative bodies acting in official matters to make automated decisions if the conditions set out in the Digital State Act are met and there are no opposing parties. Furthermore, this Act will also make automated decisions possible if it is permitted by law or a government

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decree, if all data is available when the application is received, if the decision does not require deliberation, and if there is no opposing party.

The technical details of automated decision-making are set out in Government Decree No. 322/2024 (of 6 November 2024).

Automated decision-making is possible if authorized by law. Examples include the procedure for the cancellation of enforcement rights registered on real estate in a real estate registration process and the cancellation of mortgage rights registered by the tax authority. Furthermore, in certain cases, the procedure for imposing road traffic fines is also conducted by automated decision-making.

2. Are there provisions in your legal system governing the design, deployment and use of artificial intelligence systems employed by public administrations?

☒ **YES**

☐ NO

If so,

2.a. what type of implementation measures are these? (for example, legislative or soft law):

At the legislative level, the Digital State Act allows the use of artificial intelligence-based technology in relation to regulated electronic administration services and central electronic administration services (support services). The implementing decree of the Digital State Act [Government Decree No. 321/2024 (of 6 November 2024)] states that, in the course of handling the administrative affairs of a case via video technology, the signature of the user or that of the representative of the organization providing the digital services may be replaced by voice transcription based on artificial intelligence, in accordance with the detailed rules set out in Section 22 (4) of the Digital State Act. Signatures replaced by artificial intelligence-based voice transcription are linked to the validity of the legal declaration.

In addition to the aforementioned points, both the Digital State Act and the Government Decree contain rules on automated administrative decision-making.

2.b. Is there an obligation for public administrations to inform the public or individuals about the use of AI systems?

Sectoral legislation allows for the use of automated decision-making procedures, depending on the proceedings that are conducted by the authorities. In any proceeding initiated under Act C of 2021 on the Real Estate Register, the decision-making body is required to inform the user that the decision was made using an automated decision-making procedure, which ensures the transparency of the proceeding and keeps users well-informed.

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2.c. Are any authorities or bodies responsible for developing general rules or standards for the use of artificial intelligence within public administrations?

Based on Government Decree No. 1004/2016 (of 18 January 2016) on establishing the annual development framework for the Operational Program for Public Administration and Public Services Development (the KÖFOP in Hungarian), the Ministry of the Interior and a consortium led by it implemented the project to create an automated public administration system.

3. What conditions must be met to ensure the legality of administrative procedures involving the use of artificial intelligence systems?

In particular:

3.a. Is the decision-making administration required to indicate the type of algorithmic system used and its principal characteristics?

Our detailed response is provided in the box below.

3.b. At what stage of the procedure must the administration provide information about the use of an algorithmic system and its characteristics?

Our detailed response is provided in the box below.

3.c. Does the interested party have the opportunity to comment on or challenge the use or operation of the AI system before the final decision is made?

Our detailed response is provided in the box below.

4. Are specific areas of administrative law in your country subject to express authorisation for the use of administrative decisions based on artificial intelligence systems?

Our detailed response is provided in the box below. It should be noted that automatic decision-making is possible, but AI-based decision-making is not.

5. Are there specific areas of administrative law in which the use of artificial intelligence systems for issuing administrative decisions is expressly prohibited?

N/A

B.II – Judicial review of automated administrative decisions

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6. Does national case-law recognise the legality of automated administrative decisions?

☒ **YES**

☐ NO

Please explain if necessary:

If so:

6.a. What principles and conditions have been identified by national case-law as necessary for these decisions to be legally valid?

The legality of automated decision-making is guaranteed, and the right to remedy is ensured under the same conditions as for decisions made in ordinary proceedings.

6.b. Have any limitations been identified with regard to the possibility of delegating the administration's decision-making power to algorithmic systems?

N/A, or see our response in the box below.

6.c. In particular, which of the following principles must be respected, according to national case-law, when adopting an automated administrative decision? (Please tick all that apply)

☒ **Principle of transparency**
☒ **Principle of non-exclusivity of human intervention ('human in the loop')**
☒ **Principle of non-discrimination**
☒ **Principle of knowledge and comprehensibility of algorithmic functioning**
☒ **Principle of attributing the decision to an authority vested with power**
☒ **Other (please specify)**

Currently, there is no Hungarian legislation or binding guideline specifically applicable to courts or administrative bodies and authorities that would define the concept of AI independently and specifically in the context of these bodies.

Article 3 (1) of the AI Act defines the concept of an AI system, which is also applicable in Hungary: a machine-based system that is designed to operate with varying levels of autonomy and that may exhibit adaptiveness after deployment, and that, for explicit or implicit objectives, infers, from the input it receives, how to generate outputs such as predictions, content, recommendations, or decisions that can influence physical or virtual environments.

Based on the above definition, AI-based systems that are capable of learning, thinking, and making decisions without human intervention are not involved in either adjudication or administrative decision-making.

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As mentioned above, we have identified the automatic decision-making procedure, which is laid down in Section 21 of the Digital State Act, as AI-supported decision-making, which cannot be applied in cases that require deliberation or in cases where not all data is available to the administrative body. An important safeguard is that clients may request that their application be re-evaluated in a full procedure. Sectoral legislation determines the types of cases in which automatic decision-making is possible. Act I of 1988 on Road Transport should be underscored. Under this Act, fines for violations of traffic rules specified therein are imposed in an automatic decision-making procedure, which is subject to appeal.

Furthermore, the implementing regulation of the Digital State Act specifies an AI-based voice transcription service.

7. Has national case-law ruled on the nature and legal classification of the algorithm or AI system used for administrative decision-making?
No, it has not.

8. What are the limits of the judicial review that administrative judges can exercise over automated administrative decisions?
N/A

9. According to national case-law, is the right of access to the algorithmic process that led to the automated administrative decision recognised?
N/A

☐ YES
☐ NO

If so:
9.a. What information relating to the AI system (data, logic, key parameters) must be made available to the party concerned?

Part C
Administrative judges and the use of artificial intelligence in the performance of judicial functions and in the decision-making process, in light of Regulation (EU) 2024/1689 (the 'AI Act') and other European Union standards and regulations, such as the GDPR, the DSA, the DMA, etc.

1. Does your country recognise, at constitutional level, principles that expressly refer to the use of artificial intelligence in the performance of judicial functions?

☐ YES

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☒ **NO**

If so, please specify which ones

2. Has your country adopted or is it in the process of adopting national measures to implement Regulation (EU) 2024/1689 (the AI Act) concerning the use of artificial intelligence to support judicial decision-making, which is classified as a 'high-risk' activity (Annex III, point 8(a))?

☐ YES

☒ **NO**

If so:

The implementation of the AI Act – as a directly applicable regulation – is in progress in accordance with Act LXXV of 2025 on the implementation of the European Union's Artificial Intelligence Regulation in Hungary and the adoption of the Digital State Act.

2.a. What is the nature of these measures (legislative, regulatory, guidelines, soft-law instruments)?
N/A

2.b. For what purposes is the use of AI permitted? (Please tick all that apply)

☒ **Research and interpretation of the law**

☒ **Research and assessment of the facts**

☒ **Application of the law to a specific factual situation**

☒ **Administrative activities that are purely ancillary (recital 61 of Regulation (EU) 2024/1689)**

Please explain if necessary:

2.c. What measures are taken to ensure human oversight (Article 14 of Regulation (EU) 2024/1689)? In particular, under what conditions is the user able to ignore, cancel or

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override the result produced by the artificial intelligence system (Article 14(4)(d) of the AI Act), or to suspend or interrupt its use (Article 14(4)(d) of the AI Act)?
N/A

2.d. What regulatory measures have been adopted to ensure the transparency, accuracy and robustness of the artificial intelligence system used (Articles 13 and 15 of Regulation (EU) 2024/1689 – the AI Act)?
N/A

3. Are there any official forms of testing or use of artificial intelligence systems for decision-making or generating judicial decisions currently in place in your country?

☐ YES

☒ **NO**

Please explain if necessary:

We answered the question in relation to AI-based decision-making related to judicial activities (the AI Regulation is currently being implemented).

If so:

3.a What do they consist of?

N/A

3.b. What data sets are used?

N/A

3.c. Is the software used publicly owned or provided by private operators?

3.d. Have any biases been identified in its operation? If so, what kind?

N/A

4. Are measures planned in your country to ensure a sufficient level of artificial intelligence literacy specifically for judges (Article 4 of Regulation (EU) 2024/1689)?
☒ **YES**

☐ NO

If so:

4.a. What do these measures consist of?

Please see the answer to question A/IV.

In addition, it should be mentioned that those training courses which are organized every six months by the European Legal Advisory Network bring together judges and court

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secretaries and regularly cover artificial intelligence, including the acquisition of the appropriate level of AI skills referred to in Article 4 of Regulation (EU) 2024/1689.

4.b. Is specific training planned to prevent or limit the phenomenon known as 'automation bias' (Article 14(4)(b) of the AI Act)?

☐ YES

☐ NO

Please explain if necessary:

See our answer to question 4.

5. Is the use of generative or agentic artificial intelligence systems permitted in your country to assist in the drafting of procedural documents or court decisions?

No, there is no possibility for automatic (AI-based) decision-making in the judicial process.

To help you understand the question better: **generative artificial intelligence (AI)** is a category of AI models which, thanks to machine learning and training on vast amounts of data, are capable of creating original content (text, images, videos, music, etc.). **Agentic AI** is described as a system capable of autonomously planning, making decisions and executing complex tasks with minimal human intervention to achieve a defined objective [source: OECD].

6. Has the national case law of your country addressed issues concerning the interpretation and application of EU Regulation 2024/1689?

☐ YES

☒ **NO**

Please explain if necessary:

6.a. If yes, which principles have been established?

7. Have national courts of your country submitted preliminary rulings to the Court of Justice of the European Union regarding EU Regulation 2024/1689?

☐ YES

☒ **NO**

Please explain if necessary:

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7.a. If yes, which questions were referred? What answers has the Court of Justice of the European Union provided?

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