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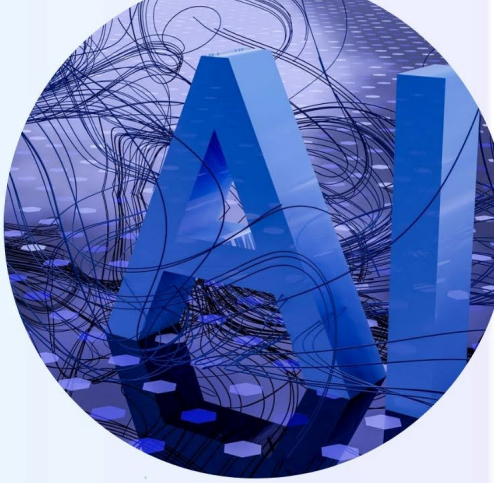

National regulatory and policy landscape for AI in higher education

Italy, Lithuania, Spain, Germany, Slovenia and Latvia

ERASMUS+ COOPERATION PARTNERSHIP PROJECT

„Empowering Higher Education through Artificial Intelligence Integration – EHEAII",
Project nr. 2025-1-LV01-KA220-HED-000359026

CONTENT

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INTRODUCTION

The rapid integration of artificial intelligence into higher education is transforming teaching, learning, research, and institutional governance across Europe. While European-level legal instruments establish a common regulatory framework, the practical implementation of AI in universities is significantly shaped by national legislation, policy strategies, and institutional guidelines. National governments play a crucial role in defining how AI may be adopted in education, how academic integrity and data protection are safeguarded, and how innovation is balanced with fundamental rights and educational quality.

This report provides a structured overview of national regulatory and policy frameworks relevant to the use of artificial intelligence in higher education in **Italy, Lithuania, Spain**, **Germany**, **Slovenia and Latvia** - the partner countries of the project. Together, these countries cover different regions of the European Union and reflect diverse legal systems, governance traditions, and approaches to digital transformation. This diversity enables a comparative perspective on how AI is addressed at national level within higher education.

The **target audience** of this report includes higher education leaders, policy makers, legal experts, quality assurance professionals, academic staff, and researchers involved in decision-making related to AI adoption in universities. The purpose of the report is to clarify the existing national regulatory landscape, identify key legal and policy instruments, and highlight their practical implications for higher education institutions.

The **main objective** is to analyse how national legislation and policy documents address issues such as academic integrity, ethical use of AI tools, data protection, intellectual property, institutional autonomy, transparency, and accountability.

The report has been developed in cooperation with all project partners: Turiba University (Latvia), SMK College of Applied Sciences (Lithuania), University of Maribor (Slovenia), University of Genoa (Italy), Fundació Universitat Autònoma de Barcelona (Spain), and FH Aachen University of Applied Sciences (Germany).

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ABOUT THE PROJECT

This report has been prepared within the framework of the Erasmus+ Cooperation Partnership project "Empowering Higher Education through Artificial Intelligence Integration – EHEAII".

Turiba University from Latvia in cooperation with 5 partner Universities from Lithuania, Spain, Germany, Italy and Slovenia began implementing the ERASMUS+ cooperation partnership project "Empowering Higher Education through Artificial Intelligence Integration" (EHEAII). The initiative aims to equip higher education institutions (HEIs) with tools and methodologies for the responsible and effective integration of Artificial Intelligence (AI) into teaching, learning, and institutional processes.

The project addresses the growing impact of AI on higher education, emphasizing that universities must adapt strategically to ensure AI supports, rather than replaces, essential cognitive and analytical skills. The consortium focuses on developing practical, ethical, and pedagogically sound approaches to AI adoption in academia.

The project delivers a concise set of practical outcomes that support the responsible integration of artificial intelligence in higher education, including an analytical overview of how AI is used in universities, the AI Maturity Test as a self-assessment tool for institutions and educators, guidelines for risk mitigation and cognitive skill development, a collection of best practices and ready-to-use teaching tasks across several disciplines, and a Moodle-based online course "AI Tools and Use in Teaching Process" that strengthens educators' skills, confidence, and ethical awareness in using AI in teaching.

Further information about the project and its partners is available at **http://eheaii.eu**

PROJECT PARTNERS:

Turība University · SMK College of Applied Sciences · Università di Genova · Univerza v Mariboru · Prevenció i Seguretat Integral Escola FUAB Formació · FH Aachen University of Applied Sciences

1. ITALY

Italy has established a structured but multi-level framework governing artificial intelligence, combining binding legislation, strategic policy documents, and institutional-level guidelines.

At the **level of the national legal framework**, two key instruments are in force. Ministerial Decree No. 166 of 9 August 2025 introduced a dedicated AI digital service within the UNICA platform to support informed, safe, and ethical AI use in schools. It includes operational guidelines and best practices for teaching, but it does not apply to higher education institutions. In contrast, Law No. 132 of 23 September 2025 constitutes the first comprehensive national AI law. It is grounded in principles of anthropocentric, transparent, and secure AI use, ensuring traceability, human responsibility, cybersecurity, accessibility, and privacy protection. The law aligns with the EU AI Act and applies across sectors, including higher education in both teaching and research. It also delegates powers to the Government to adopt further implementing decrees.

At the **level of national strategies and policy documents**, the Italian Strategy for Artificial Intelligence 2024–2026 defines AI integration as a national priority across economic and social sectors. Education is identified as a central field of action, and AI integration in higher education institutions is explicitly recognised as a strategic objective, mainly through training initiatives and mobility programmes. The Guidelines for the Introduction of Artificial Intelligence in Educational Institutions (2025), issued by the Ministry of Education and Merit, provide a structured framework for ethical and responsible AI use in schools, aligned with European and international standards. However, these guidelines are not applicable to higher education.

At the **institutional and sectoral level**, numerous universities have adopted internal policies and recommendations regulating AI use in teaching, research, and administration. The analysed institutions include the University of Genoa, Bologna, Camerino, Milano, Milano Bicocca, Trento, Siena, Padova, Teramo, Ca' Foscari Venezia, Piemonte Orientale, and Firenze. In addition, professional associations have issued sector-specific guidance. These institutional policies reflect the principles established at national and European level, but implementation remains decentralised and shaped by university autonomy.

Italy demonstrates a solid level of legal and policy readiness for the integration of artificial intelligence in higher education. The fundamental principles for legitimate, ethical, and effective AI use are clearly established in the national AI law adopted by Parliament. These principles provide a general framework applicable to universities in both teaching and research. However, no specific decree has been issued by the Ministry of University and Research to harmonise implementation across higher education institutions. As a result, universities regulate AI autonomously, and approaches differ depending on whether and how each institution has adopted internal guidelines.

The **main challenge** concerns the absence of a uniform national approach to AI use in teaching. Local university policies tend to focus primarily on transparency in research and on developing students' capacity to use AI critically and responsibly. Professors retain broad discretion in determining how AI may be used in their courses. Universities are expected to provide training opportunities for academic and administrative staff, yet national strategies and governmental guidelines remain largely programmatic. Concrete implementation measures are still ongoing and not systematically reported.

In terms of **good practices**, several universities, including Genoa and Padova, offer training courses through their Teaching and Learning Centres to support the pedagogical integration of AI. Conferences and academic events on AI have also been organised, although they are more common within Education Sciences departments than in disciplines such as Law, Political Science, Engineering, Medicine, or Literature. The UNICA platform developed for schools represents a structured model for sharing practices and could serve as a useful example for future coordination in higher education.

ANALYSED DOCUMENTS

1. The Italian Strategy for Artificial Intelligence 2024–2026 (Strategia Italiana per l'Intelligenza Artificiale 2024–2026)

The Italian Strategy for Artificial Intelligence 2024–2026 is a national strategic plan aimed at integrating AI across all sectors where it can generate value. It recognises AI as a transformative force for society, the economy, education, labour, and industry. The document stresses that Italy has a strong academic tradition in AI, with more than 160 university courses and a National PhD in AI involving over 60 universities and research centres. However, it also highlights structural weaknesses, such as low percentages of ICT graduates and limited digital skills in the population.

Education is identified as one of the four strategic macro-areas, together with research, public administration, and businesses. With specific reference to higher education, the Strategy pursues two main objectives:

- Promote comprehensive university education in AI from a transversal and interdisciplinary perspective, consolidating specialised training such as the National Doctorate in Artificial Intelligence.
- Support dissemination initiatives, awareness-raising, and reskilling and upskilling programmes.

Strategic actions related to higher education include integration of AI into all degree programmes (including non-STEM disciplines), strengthening doctoral training, mobility programmes, and advanced technical education pathways.

The Strategy also establishes a monitoring system based on KPIs, annual reporting, and the involvement of national authorities such as AgID and the National Cybersecurity Agency. It identifies risks related to inaction, cultural homogenisation, overregulation, labour market disruption, digital divide, and ineffective implementation.

For higher education, the Strategy is programmatic rather than binding. It defines priorities and actions but does not impose specific legal obligations on universities.

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2. The Guidelines for the Introduction of Artificial Intelligence in Educational Institutions (Linee guida per l'introduzione dell'Intelligenza Artificiale nelle istituzioni scolastiche 2025)

The Guidelines for the Introduction of Artificial Intelligence in Educational Institutions (version 1.0, 2025), issued by the Ministry of Education and Merit, provide a structured framework for the responsible and human-centred adoption of AI in schools.

They align with the EU AI Act, the Council of Europe Framework Convention on AI and Human Rights, and the Italian National AI Strategy. The document is built around six core principles: centrality of the person, equity, ethical and responsible innovation, sustainability, protection of fundamental rights, and system security.

The Guidelines define ethical, technical, and regulatory requirements, including human oversight, transparency, bias prevention, GDPR compliance, data minimisation, Data Protection Impact Assessments for high-risk systems, and the right to opt out of data processing. They also outline a five-phase implementation model: definition, planning, adoption, monitoring, and evaluation.

Although explicitly addressed to schools and not to universities, the document provides a governance model that could be extended to higher education teaching activities, especially in the absence of a similar document issued by the Ministry of University and Research. The Guidelines do not address research activities.

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3. Ministerial Decree No. 166/2025 (Decreto Ministeriale n. 166 del 9 agosto 2025)

Ministerial Decree No. 166/2025 introduces a digital service dedicated to AI within the UNICA platform, already used by families, students, and schools. The objective is to support informed, safe, and ethical use of AI in schools.

The platform includes two main sections:

- AI Guidelines – accessible to all users, providing explanations of applicable rules (EU AI Regulation, GDPR), data protection safeguards, and ethical principles.
- AI Projects – reserved for school administrators, allowing registration and sharing of AI initiatives.

The Decree emphasises privacy protection, cybersecurity, GDPR compliance, and approval by the Italian Data Protection Authority. No data are transferred outside Europe.

The measure applies exclusively to schools. Universities cannot access or upload projects on the platform. However, the creation of a national platform for sharing best practices is identified as a potentially useful model for higher education.

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4. Law No. 132/2025 (LEGGE 23 settembre 2025, n. 132 – Disposizioni e deleghe al Governo in materia di intelligenza artificiale)

Law No. 132/2025 is the first national AI law and constitutes the general legal framework for AI use in Italy. It is aligned with Regulation (EU) 2024/1689 and does not introduce additional obligations beyond those set at EU level.

The law is based on principles of anthropocentric, transparent, and secure AI use, with guarantees of traceability, human responsibility, and final decision-making by natural persons. It applies across multiple sectors, including healthcare, employment, public administration, justice, and education.

Although it does not directly regulate higher education, it applies to all AI uses and therefore includes universities among its recipients. It establishes:

- Respect for fundamental rights, fairness, transparency, explainability, equality, sustainability, and cybersecurity.
- Clear governance roles for AgID (promotion and innovation) and ACN (supervision and compliance).
- Provisions concerning copyright, criminal liability (including deepfakes), and corporate liability.

Article 24 delegates to the Government the adoption of decrees ensuring AI-related training in university courses and strengthening AI research and technology transfer.

The law also contains specific provisions for scientific research in healthcare, allowing secondary use of personal data for research purposes under defined safeguards.

The main gap identified concerns implementation and clarification of liability allocation. Further delegated decrees are required to operationalise the principles set out in the law.

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5. Guidelines for the Use of AI in Universities

In the absence of a specific national decree for higher education, many universities have adopted their own guidelines on AI use in research, teaching, and administration. The desk research reviewed policies from multiple Italian universities.

While approaches differ, common elements include:

- Requirement to declare AI use in academic work.
- Obligation to verify and critically assess AI-generated outputs.
- Responsibility of the user for the final content.
- Compliance with copyright, confidentiality, and data protection rules.
- Emphasis on intellectual honesty and transparency.

Some universities leave wide discretion to individual teachers to regulate AI use in their courses, while others establish more centralised institutional policies. Certain institutions link AI misuse to disciplinary mechanisms through existing codes of ethics, while others do not provide explicit sanctions.

Training initiatives for professors and administrative staff are frequently offered, and many policies encourage critical and responsible AI use rather than prohibition.

No uniform regime exists at national level, and institutional autonomy results in heterogeneous regulatory approaches.

Here is the list of HE institution's Guidelines that have been examined:

University of Genoa (draft, not yet adopted)
University of Bologna: LINK
University of Camerino: LINK
University of Milano: LINK
University of Milano Bicocca: LINK
University of Trento: LINK
University of Siena: LINK
University of Teramo: LINK
University of Parma: LINK
University Ca' Foscari Venezia: LINK
University of Piemonte Orientale: LINK
University of Firenze: LINK

2. LITHUANIA

Lithuania has developed a national policy framework for artificial intelligence primarily through strategic documents, recommendations, and institutional guidelines rather than through a specific binding law regulating AI use in higher education. The national approach focuses on creating favourable conditions for AI development, strengthening the national AI ecosystem, and promoting responsible and ethical use of artificial intelligence across sectors, including education and research.

At the strategic level, Lithuania adopted **the Lithuanian Artificial Intelligence Strategy: a Vision for the Future in 2019,** becoming one of the first European Union Member States to establish a national vision for AI development. The strategy aims to modernise and expand Lithuania's AI ecosystem and ensure national readiness for a future shaped by artificial intelligence. It identifies key areas such as ethical and legal principles for trustworthy AI, skills development, research and innovation, economic applications of AI, and data governance infrastructure. Within this framework, higher education institutions are recognised as central actors responsible for developing AI competencies, expanding research capacity, and strengthening collaboration between academia and industry.

The strategic framework is complemented by the **Lithuanian Action Plan for Artificial Intelligence Technologies Development 2023–2026**, which translates the strategic vision into concrete implementation measures. The plan focuses on strengthening the national AI ecosystem, promoting the deployment of AI technologies across sectors, and supporting high-level innovation. Several measures address the development of academic expertise and research capacity, including support for lecturers and researchers to participate in international AI training and collaboration initiatives.

In addition to strategic documents, Lithuania has introduced national recommendations addressing specific aspects of AI use. **The Recommendations for the Safe Use of Artificial Intelligence Solutions in an Organization**, issued by the National Cyber Security Centre, focus on cybersecurity risks related to AI technologies and provide guidance on technical and organisational safeguards. Although not specifically targeted at higher education, these recommendations are relevant for universities as organisations that increasingly deploy AI tools in research, teaching, and administrative systems.

Lithuania has also developed sector-specific ethical guidance for higher education. **The Guidelines for the Ethical Use of Artificial Intelligence in the Science and Study Process,** issued by the Office of the Ombudsperson for Academic Ethics and Procedures, provide recommendations for universities, research institutions, students, and academic staff on the responsible use of AI technologies in studies and scientific research. These

guidelines address issues such as academic integrity, transparency, intellectual property, and institutional responsibility for AI governance.

Additional perspectives are provided by the **Academic Integrity and Artificial Intelligence Recommendations** prepared by the **Lithuanian National Union of Students.** These recommendations address the impact of AI on teaching, learning, and assessment and emphasise the need for clear institutional policies, improved AI literacy, and updated assessment methods to ensure fairness and transparency in academic environments.

ANALYSED DOCUMENTS

1. Lithuanian Artificial Intelligence Strategy: a Vision for the Future (2019)

The Lithuanian Artificial Intelligence Strategy: a Vision for the Future establishes a national vision for the development and use of artificial intelligence in Lithuania. Its objective is to modernise and expand the national AI ecosystem and ensure that the country is prepared for a future shaped by artificial intelligence. The strategy covers a wide range of areas, including ethics, skills development, research and innovation, economic applications of AI, and data governance.

The document is structured around several strategic pillars, including ethical and legal principles for trustworthy AI, the positioning of Lithuania within the global AI ecosystem, the adoption of AI across economic sectors, the development of skills and competencies, the growth of AI research and development, and the creation of a data infrastructure supporting AI innovation.

Higher education plays a central role within the strategy. Universities are expected to integrate ethical considerations related to AI into education, offer learning opportunities related to artificial intelligence across different disciplines, and strengthen research capacity in AI. The strategy also proposes the creation of a national AI research centre, funding for AI-related doctoral studies, and increased collaboration between universities and industry.

Ethical and legal considerations form an important component of the strategy, emphasising human-centric AI, transparency, fairness, accountability, and data protection. At the same time, the strategy remains a high-level policy document and does not define specific implementation mechanisms or detailed operational guidance for universities.

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2. Lithuanian Action Plan for Artificial Intelligence Technologies Development 2023–2026

The Lithuanian Action Plan for Artificial Intelligence Technologies Development 2023–2026 translates the national AI strategy into concrete policy actions aimed at strengthening Lithuania's AI ecosystem and accelerating the development and deployment of AI technologies. The plan focuses on three strategic objectives: strengthening the national AI ecosystem, promoting AI deployment across sectors, and creating conditions for high-level AI innovation.

Key measures include improving data governance, supporting access to computing infrastructure for research institutions, promoting AI innovation and start-ups, and strengthening international cooperation in AI research. The plan also proposes coordination mechanisms such as the creation of an AI Development Council and initiatives to increase public awareness of responsible AI use.

Although the document primarily addresses economic and technological development, it also contains measures relevant to higher education. These include support for university lecturers and researchers to participate in international AI training opportunities, initiatives that encourage collaboration between universities and industry, and the development of research infrastructure that strengthens AI research capacity in academic institutions.

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3. Recommendations for the Safe Use of Artificial Intelligence (AI) Solutions in an Organization

The Recommendations for the Safe Use of Artificial Intelligence Solutions in an Organization provide guidance for organisations on the secure deployment and management of AI technologies. The document explains key AI concepts, identifies cybersecurity risks associated with AI systems, and proposes technical and organisational measures to mitigate these risks.

The recommendations outline common threats related to AI systems, including data leakage, model manipulation, prompt injection, and unauthorised access to sensitive information. They also propose security measures such as access control mechanisms, encryption, monitoring systems, vendor risk assessment procedures, and regular security audits.

Although the document is not specifically targeted at higher education institutions, it is relevant for universities that increasingly use AI tools in research, teaching, and administrative processes. The recommendations highlight the importance of protecting

research data, safeguarding institutional digital systems, and strengthening awareness of AI-related security risks among staff and students.

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4. Guidelines for the Ethical Use of Artificial Intelligence in the Science and Study Process (2024)

The Guidelines for the Ethical Use of Artificial Intelligence in the Science and Study Process provide recommendations on ensuring the ethical use of AI technologies in higher education and research activities. The document is addressed to universities, colleges, research institutions, and members of the academic community involved in teaching and scientific work.

The guidelines define key ethical principles for AI use, including academic integrity, responsibility, transparency, fairness, protection of human rights, competence development, and a clear distinction between human-generated and AI-generated content. They also identify potential risks related to AI use in education, such as bias, reduced critical thinking, unequal access to AI tools, and issues related to data security and intellectual property.

The document recommends that higher education institutions develop internal policies on AI use, adapt assessment practices, ensure transparency when AI tools are used in academic work, and critically evaluate the reliability and ethical implications of AI outputs. It also requires disclosure of AI use in academic publications and emphasises that responsibility for AI-assisted outputs remains with the human author.

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5. Academic Integrity and Artificial Intelligence Recommendations (2024)

The Academic Integrity and Artificial Intelligence Recommendations provide guidance on maintaining academic integrity in higher education in the context of increasing AI use. The recommendations are based on research on academic integrity and consultations with students and administrators from several higher education institutions.

The document highlights both opportunities and risks associated with AI in education. AI tools can support learning through feedback, idea generation, and information processing, but they also raise concerns related to academic dishonesty, unclear authorship, and potential bias in AI systems.

The recommendations encourage universities to adopt clear institutional policies regulating AI use, strengthen AI literacy among students and staff, and redesign

assessment methods to ensure that student performance reflects genuine learning outcomes. The document also emphasises transparency, proper referencing of AI-generated content, and the need for human oversight in decisions that affect students.

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3. SPAIN

Spain has developed a national framework for artificial intelligence that combines administrative regulations, strategic policy initiatives, and governance mechanisms designed to supervise and promote responsible AI development. Rather than focusing exclusively on higher education, the Spanish approach addresses artificial intelligence as a cross-sectoral technological transformation affecting public administration, research, industry, and education. Within this broader ecosystem, universities play an important role as developers, researchers, and users of AI systems.

At the national regulatory level, Spain has established institutional structures and governance instruments that support the supervision and responsible deployment of artificial intelligence. **Royal Decree 729/2023** created the **Spanish Agency for the Supervision of Artificial Intelligence (AESIA),** a public authority responsible for coordinating oversight, promoting responsible AI use, and preparing the national ecosystem for the implementation of European AI regulatory frameworks.

In parallel, **Royal Decree 817/2023** introduced a controlled testing environment for artificial intelligence systems, commonly referred to as the AI regulatory sandbox. This mechanism enables organisations to test innovative AI systems under supervised conditions while ensuring compliance with legal and ethical safeguards, particularly with regard to safety, fundamental rights, and public interest. The sandbox approach reflects Spain's intention to support innovation while maintaining strong governance mechanisms for emerging technologies.

Spain's strategic orientation in the field of artificial intelligence is further defined by the **National Artificial Intelligence Strategy (ENIA)**. This strategy establishes the country's long-term roadmap for AI development, focusing on research excellence, talent development, infrastructure, and the promotion of trustworthy AI aligned with European values. Within this framework, higher education institutions are recognised as central actors in the national AI ecosystem due to their role in research, education, and innovation.

ANALYSED DOCUMENTS

1. Royal Decree 729/2023 (Statute of the Spanish Agency for the Supervision of Artificial Intelligence – AESIA)

Royal Decree 729/2023 establishes and regulates the Spanish Agency for the Supervision of Artificial Intelligence (AESIA) by approving its Statute and defining its legal nature, governance structure, and institutional mandate within Spain's AI governance framework. The Decree positions AESIA as a central national authority responsible for

supervising, coordinating, and promoting trustworthy and responsible artificial intelligence. Its activities are designed to ensure alignment with European Union AI governance, particularly the forthcoming EU Artificial Intelligence Act. The scope of the regulation is national and cross-sectoral and applies to both public and private actors involved in the development or deployment of AI systems.

The Decree assigns AESIA a broad mandate related to AI governance. Its responsibilities include supervising AI systems that may pose risks to fundamental rights, safety, or the public interest; preparing national institutions for the implementation of European AI regulatory requirements; providing technical, legal, and ethical guidance regarding AI deployment; promoting awareness and training related to responsible AI use; and facilitating coordination between national authorities, regional administrations, European institutions, and other stakeholders.

Although the Decree does not specifically regulate higher education institutions, its provisions are relevant to universities due to their role as developers and users of AI technologies. Universities frequently develop AI systems within research projects and experimental models and increasingly deploy AI-based tools in learning analytics, administrative automation, admissions support systems, and generative AI applications in teaching and research. Higher education institutions may interact with AESIA when seeking guidance on compliance, risk classification, or ethical design of AI systems, as well as when participating in pilot initiatives or regulatory sandboxes.

From a legal and ethical perspective, the Decree reflects a rights-oriented and risk-based approach to AI governance consistent with emerging European regulatory principles. It emphasises the protection of fundamental rights, including privacy, non-discrimination, and human dignity. It also promotes accountability, transparency, responsible innovation, and clear governance structures. For universities, these principles provide a normative foundation for institutional AI governance, particularly in areas such as academic integrity, student data protection, and ethical AI research.

Overall, Royal Decree 729/2023 represents an important institutional component of Spain's AI governance system. For higher education institutions, its primary relevance lies in establishing a national supervisory authority and defining governance principles that universities may adopt when designing internal AI policies, compliance mechanisms, and responsible innovation strategies.

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2. Royal Decree 817/2023 (Controlled Testing Environment for Artificial Intelligence – AI Sandbox)

Royal Decree 817/2023 establishes a controlled testing environment, commonly referred to as an AI regulatory sandbox, designed to support the experimental testing and evaluation of artificial intelligence systems in Spain. The primary objective of the Decree is to enable the deployment and assessment of AI systems under supervised and legally secure conditions, particularly in cases where such technologies may present risks to safety, health, or fundamental rights.

The Decree introduces a governance framework that allows organisations to experiment with AI technologies in real or near-real operational environments while maintaining regulatory oversight. The sandbox approach reflects Spain's intention to support technological innovation while ensuring that experimentation does not compromise legal safeguards or ethical standards. The scope of the Decree is national and cross-sectoral and applies to both public and private actors involved in developing, deploying, or testing AI systems.

Several key provisions structure the operation of the AI sandbox. These include eligibility criteria for organisations wishing to participate in the sandbox, supervision and monitoring mechanisms conducted by competent authorities, and obligations related to risk identification and mitigation. Participants must assess potential impacts on safety, health, and fundamental rights and implement appropriate safeguards. The Decree also emphasises alignment with national and European AI governance frameworks and introduces requirements related to documentation and traceability of testing activities.

Higher education institutions are directly relevant within this framework because of their role as developers and testers of innovative AI technologies. Universities frequently develop experimental AI systems within research projects, including proof-of-concept models and prototype tools. They may also participate in public–private pilot initiatives and serve as testing environments for AI applications in areas such as learning analytics, intelligent tutoring systems, research management tools, and administrative automation. Participation in the sandbox allows universities to evaluate compliance, governance mechanisms, and ethical safeguards before deploying AI systems at a larger scale.

The Decree places strong emphasis on legal and ethical safeguards during experimentation. These include protection of fundamental rights, systematic risk assessment, meaningful human oversight of AI processes, and clear documentation and accountability. For universities, these provisions create a structured pathway for aligning experimental AI research with regulatory expectations, including those related to the General Data Protection Regulation and the emerging EU AI Act.

Overall, Royal Decree 817/2023 provides an operational governance mechanism that allows innovative AI projects to be tested responsibly. While participation in the sandbox is limited to specific projects, the framework offers higher education institutions an

opportunity to integrate legal compliance and ethical safeguards into the development and evaluation of AI systems.

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3. National Artificial Intelligence Strategy (ENIA – Estrategia Nacional de Inteligencia Artificial)

The National Artificial Intelligence Strategy (ENIA) establishes Spain's overarching strategic framework for the development, deployment, and governance of artificial intelligence. Although the strategy is not specifically targeted at higher education, it defines a national roadmap that influences multiple sectors, including research, education, innovation, and public administration.

ENIA promotes a human-centric and trustworthy approach to AI, positioning artificial intelligence as a key driver of economic growth, social wellbeing, and technological modernisation. The strategy functions as a reference framework guiding national policies, funding initiatives, and institutional strategies related to AI development and adoption.

The strategy is structured around several strategic pillars addressing research excellence, talent development, technological adoption, enabling infrastructure, and trustworthy governance. One major pillar focuses on strengthening AI research and development capacity by supporting interdisciplinary collaboration, innovation ecosystems, and public–private partnerships. Within this context, universities are recognised as primary centres of AI research and innovation, hosting research groups, doctoral programmes, and technology transfer activities.

Another pillar emphasises the development of talent and advanced digital skills. The strategy identifies the shortage of AI-skilled professionals as a major challenge for technological development. Higher education institutions are therefore expected to play a key role in educating future AI professionals, modernising curricula, integrating AI competencies across disciplines, and supporting lifelong learning through postgraduate programmes and professional training.

ENIA also promotes the adoption and integration of AI across public administration and economic sectors. Universities contribute to this process by acting as partners in pilot initiatives, evaluating AI impacts, and supporting the development of practical applications. In addition, the strategy highlights the importance of enabling conditions such as access to data, digital infrastructure, and coordination mechanisms, which are necessary for effective AI deployment.

Trustworthy AI is presented as a cross-cutting principle throughout the strategy. Ethical governance, transparency, accountability, and social responsibility are emphasised as essential components of sustainable AI development. For higher education institutions,

these principles provide a normative basis for establishing internal governance frameworks addressing ethical review processes, responsible AI research, and protection of fundamental rights when AI technologies affect students or staff.

Although ENIA provides a comprehensive strategic framework, it does not function as an operational guide for universities. Higher education institutions must therefore translate the strategy's priorities into institutional policies addressing issues such as AI use in teaching and assessment, academic integrity in the context of generative AI, and governance of learning analytics and student data.

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4. GERMANY

Germany has developed a comprehensive policy framework for artificial intelligence that combines national strategic initiatives, sectoral monitoring reports, and international policy assessments. Rather than regulating AI use in higher education through a dedicated national law, Germany approaches AI governance primarily through strategic planning, research funding programmes, and broader regulatory frameworks related to data protection, ethics, and digital transformation. Within this ecosystem, universities play a central role as key actors in research, innovation, and the development of AI-related skills.

At the national level, the German Federal Government adopted the ***Artificial Intelligence Strategy – Made in Germany***, which establishes the country's overarching policy framework for AI development. The strategy aims to strengthen Germany's position as a leading AI research and innovation hub by promoting research and development, expanding AI competence centres, investing in data infrastructure, and encouraging the development of trustworthy and socially beneficial AI technologies. Higher education institutions are recognised as essential partners in achieving these objectives, particularly through research, talent development, and interdisciplinary education.

In addition to strategic policy documents, sectoral analyses provide insight into how artificial intelligence is being implemented within German universities. The ***AI Monitor 2025 – Universities Shape the AI Everyday*** examines how higher education institutions integrate AI into teaching, governance, and administrative processes. The report highlights the growing adoption of AI tools in universities, while also showing that institutional approaches remain diverse and that many universities are still developing formal policies and governance structures for AI use.

An international perspective on Germany's AI ecosystem is provided by the ***OECD Artificial Intelligence Review of Germany*.** This analysis evaluates Germany's progress in implementing its national AI strategy and assesses the country's strengths and challenges in AI development, including research capacity, talent development, and the structure of higher education programmes. The review also provides policy recommendations aimed at strengthening Germany's AI education ecosystem and expanding interdisciplinary AI training opportunities.

ANALYSED DOCUMENTS

1. Artificial Intelligence Strategy – Made in Germany

The *Artificial Intelligence Strategy – Made in Germany* defines the national strategic framework for the development and application of artificial intelligence in Germany. The strategy aims to strengthen Germany's position as a leading international centre for AI research and innovation by supporting research and development, expanding AI competence centres, investing in data infrastructure, and encouraging the responsible and trustworthy use of AI technologies.

Higher education institutions play a central role in implementing the strategy. Universities and research institutions are expected to contribute through advanced research, specialised AI study programmes, and the training of highly qualified professionals. The strategy promotes interdisciplinary AI education, stronger collaboration between academia and industry, and increased funding for AI-related research projects. It also emphasises ethical and human-centred AI aligned with European values such as transparency, accountability, and data protection.

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2. AI Monitor 2025 – Universities Shape the AI Everyday

The *AI Monitor 2025 – Universities Shape the AI Everyday* analyses how German universities are integrating artificial intelligence into teaching, research, and institutional governance. Based on a survey of universities, the report examines institutional strategies, the use of AI tools in teaching and administration, and the development of internal policies regulating AI use.

The report shows that many universities are already experimenting with AI technologies in teaching, student services, and administrative processes. Some institutions allow the use of generative AI tools in coursework when their use is transparently documented, while others restrict their use in examinations until clearer policies are established. The report also identifies emerging applications such as AI-supported communication with students and automated administrative processes.

At the same time, the analysis highlights that institutional approaches differ significantly between universities. Many institutions are still developing governance frameworks, internal guidelines, and staff training programmes related to AI. The report therefore emphasises the need for clearer institutional strategies and stronger support for responsible AI adoption in higher education.

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3. OECD Artificial Intelligence Review of Germany

The *OECD Artificial Intelligence Review of Germany* provides an international assessment of Germany's artificial intelligence ecosystem and evaluates progress in implementing national AI policies. The review analyses Germany's strengths and challenges in areas such as research capacity, talent development, innovation ecosystems, and the role of education in supporting AI development.

The report recognises Germany's strong research infrastructure and its efforts to expand AI professorships and research capacity. Universities are identified as key actors in advancing AI research and educating the workforce required for the digital economy. However, the review also notes that AI-related study programmes remain relatively limited compared to the increasing demand for AI specialists, and that many programmes are concentrated in technical disciplines.

To address these challenges, the review recommends expanding interdisciplinary AI education, increasing internationalisation through English-language programmes, and developing more flexible learning formats such as short courses and micro-credentials. These measures aim to strengthen Germany's ability to train a diverse and highly skilled AI workforce.

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5. SLOVENIA

Slovenia has developed a policy framework for artificial intelligence that is primarily based on national strategic programmes and institutional-level guidelines rather than on a specific binding national law regulating AI use in higher education. The regulatory environment therefore combines national AI and digitalisation strategies with sectoral guidelines and university-level recommendations that guide the responsible use of AI in teaching, learning, research, and data governance.

At the national policy level, the development and use of artificial intelligence are guided by strategic documents adopted by the Government of the Republic of Slovenia. The ***National Programme to Promote the Development and Use of Artificial Intelligence in the Republic of Slovenia by 2025*** establishes a comprehensive framework for building an AI ecosystem, strengthening ethical and legal foundations, and developing human capital through education and training, positioning higher education institutions as key actors in skills development and research.

This strategic direction is further reinforced by the ***National Strategy for Artificial Intelligence 2030 (NsUI 2030)***, which extends the national vision towards technological sovereignty, responsible AI aligned with European values, and stronger data and computing infrastructure, with universities contributing to talent development, research excellence, and national AI resources.

Digital transformation in education is supported by the ***Digital Education Action Plan – ANDI (2021–2027)***, which strengthens digital competences, infrastructure, and educator development, creating enabling conditions for AI integration in higher education.

Complementing these, national-level guidelines such as the ***Data Governance and Semantic Guidelines for Public Sector Data*** and the ***Guidelines for the Development, Implementation, and Use of Artificial Intelligence in Public Administration*** provide principles on data quality, interoperability, risk management, and ethical AI use applicable to academic contexts.

At the institutional level, universities have developed practical guidance, including the ***University of Ljubljana Recommendations on Using Artificial Intelligence (2022)*** and the ***University of Maribor – Faculty of Economics and Business Guidelines on the Use of Generative Artificial Intelligence in Pedagogical and Research Activities (2024)***, which define responsible AI use while safeguarding academic integrity.

ANALYSED DOCUMENTS

1. National Programme to Promote the Development and Use of Artificial Intelligence in the Republic of Slovenia by 2025

The National Programme to Promote the Development and Use of Artificial Intelligence in the Republic of Slovenia by 2025 represents Slovenia's first national strategic programme dedicated to the development, deployment, and ethical use of artificial intelligence. The document establishes national priorities for building a dynamic AI ecosystem and strengthening the regulatory and ethical framework for AI technologies, while also focusing on the development of human capital through education and training.

The programme includes several strategic objectives aimed at strengthening research and innovation capacity, developing AI infrastructure and data resources, and coordinating national initiatives related to AI development. It also emphasises the importance of ethical and legal frameworks that support trustworthy AI and ensure responsible technological development.

Higher education institutions play an important role in the implementation of the programme. Universities are expected to contribute to the development of AI-related competencies, expand research activities in artificial intelligence, and support interdisciplinary collaboration between academia, industry, and public institutions. The programme links the advancement of AI technologies with skills development and research capacity, positioning higher education as a key driver of national AI development.

From an ethical and legal perspective, the programme highlights the importance of trustworthy AI and alignment with ethical and legal principles. Education and awareness are identified as essential mechanisms for promoting responsible adoption of AI technologies.

Although the programme provides a comprehensive strategic framework for AI development, it remains relatively high-level. Implementation details and operational measures are expected to be defined through subsequent initiatives and policies. While the role of higher education is clearly recognised in relation to skills development and research, the programme does not provide specific operational guidance on the day-to-day use of AI tools in teaching, assessment, or academic practice.

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2. National Artificial Intelligence Strategy until 2030 (NsUI 2030)

The *National Artificial Intelligence Strategy until 2030* (NsUI 2030) outlines Slovenia's long-term vision for AI development, deployment, and governance across society. The strategy sets priorities for responsible AI, public trust, infrastructure, technological sovereignty, and the strengthening of Slovenian language and cultural capacities in AI systems. It provides a policy framework to align national AI initiatives with European ethical and regulatory standards, including transparency, accountability, fairness, and human oversight.

Although the strategy addresses the broader national AI ecosystem rather than higher education specifically, it creates enabling conditions for universities to engage in AI research, talent development, and AI-enabled services. Higher education institutions are expected to support the strategy by developing Slovenian-language AI resources, contributing to research infrastructures, and fostering interdisciplinary collaboration with industry and public institutions.

Ethical and legal considerations are central to NsUI 2030, with emphasis on responsible AI practices, alignment with EU values, and public trust. The strategy highlights the need for systemic monitoring, evaluation, and evidence-based policy-making to guide AI adoption responsibly.

For higher education, the strategy provides a reference framework for curriculum development, AI research, and collaboration with government and industry partners. However, operational guidance for teaching, assessment, or institutional AI use remains indirect, and additional institutional policies may be needed to translate strategic objectives into concrete academic practice.

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3. Digital Education Action Plan – ANDI (2021–2027)

The *Digital Education Action Plan – ANDI (2021–2027)* provides a national policy framework supporting digital transformation across all levels of education. The action plan focuses on strengthening digital competences, improving infrastructure, and supporting professional development for educators in order to enable the effective use of modern technologies in teaching and learning.

Although artificial intelligence is not the sole focus of the document, the action plan creates important enabling conditions for the integration of AI technologies within educational systems. It emphasises the development of digital skills for learners and educators, support for teacher training related to digital transformation, and improved national coordination in digital education policy.

The action plan also prioritises investment in digital infrastructure and inclusive access to digital learning resources. These measures aim to strengthen the overall digital capacity of educational institutions and support the adoption of new technologies.

For higher education institutions, the plan contributes to building an environment that supports the introduction of AI literacy and AI-supported teaching practices. By strengthening educators' digital competences and institutional digital capacity, the action plan indirectly facilitates the responsible use of AI tools in higher education teaching and learning.

In terms of ethical and governance considerations, the document emphasises inclusion and equitable access to digital education resources. The focus on systemic coordination also highlights the importance of coherent institutional policies related to the responsible use of digital technologies.

While the action plan provides a broad framework for digital transformation, it does not include detailed guidance specifically addressing artificial intelligence in higher education. As a result, additional AI-specific policies or institutional guidelines may be required to address issues such as assessment practices, research integrity, and data governance.

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4. Data Governance and Semantic Guidelines for Public Sector Data

The *Data Governance and Semantic Guidelines for Public Sector Data in Slovenia* provide a comprehensive framework for managing, sharing, and reusing public sector data. While not explicitly focused on artificial intelligence, the guidelines establish essential conditions that enable responsible AI applications, emphasizing data quality, interoperability, semantic standards, and governance mechanisms.

The document outlines national priorities for ensuring that public data is structured, FAIR-aligned (Findable, Accessible, Interoperable, Reusable), and ethically managed. Key objectives include the standardization of metadata, adoption of semantic models (RDF, OWL), the creation of reusable data products, and secure access control. These measures aim to enhance transparency, reproducibility, and reliability, which are critical for AI systems that rely on high-quality data inputs.

Higher education institutions are positioned as important stakeholders within this framework. Universities can leverage standardized, high-quality datasets to support AI research, teaching, and interdisciplinary collaboration with public institutions and industry. The guidelines facilitate the adoption of research data management plans (DMPs) and FAIR principles, enabling data-driven curricula, the development of AI models, and evidence-based research.

From a legal and ethical perspective, the guidelines emphasize compliance with GDPR, ZVOP-2, and other relevant regulations. They highlight integrity, accountability, and risk assessment in handling sensitive and personal data, providing a foundation for responsible AI use.

Although the guidelines focus primarily on enabling conditions rather than AI-specific regulations, they are critical for building a reliable and interoperable data ecosystem. Operational responsibilities for higher education, funding mechanisms, and direct AI applications remain to be further specified, offering opportunities for universities to shape their engagement with AI research and education.

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5. Guidelines for the Development, Implementation, and Use of Artificial Intelligence in Public Administration

The *Guidelines for the Development, Implementation, and Use of Artificial Intelligence in Public Administration* provide a framework for the responsible deployment of AI technologies in Slovenia's public sector. The document emphasises transparency, accountability, ethical compliance, and alignment with European standards, reflecting broader national priorities for trustworthy AI. It aims to ensure that AI applications in public administration are reliable, human-centric, and support public trust while fostering innovation and efficiency in government services.

Key principles include risk assessment, human oversight, ethical and legal compliance, and guidance on AI project lifecycle management. Standards for data quality, interoperability, and secure access are highlighted to underpin responsible AI use. Additionally, the guidelines encourage capacity building among public servants and recommend monitoring, evaluation, and continuous improvement of AI deployments.

For higher education institutions, the guidelines are relevant as they provide a reference framework for governance, ethics, and risk management that can be adapted in research, teaching, and administrative applications of AI. Universities can leverage these principles to develop curricula, train AI professionals, and participate in collaborative projects with public institutions. Ethical and legal considerations, including transparency, accountability, and compliance with GDPR and national legislation, are central to these recommendations.

While the document offers detailed operational guidance for public administration, its direct applicability to higher education is indirect. Further specification of roles, funding, and concrete integration of AI tools in university practice remains an opportunity for future development.

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6. University of Ljubljana – Recommendations on Using Artificial Intelligence

The *University of Ljubljana Recommendations on Using Artificial Intelligence* provide institutional guidance on the responsible and ethical use of AI tools in academic activities. The recommendations apply to both staff and students and address the use of artificial intelligence in learning, research, and academic work.

The document emphasises that AI technologies may support teaching, learning, and research processes, but their use must remain responsible and aligned with principles of academic integrity. Users are encouraged to approach AI tools critically and to remain aware of their potential limitations and biases.

The recommendations highlight the importance of verifying AI-generated outputs. Users are expected to check the accuracy of information produced by AI systems and to critically evaluate potential biases or errors. Transparency is also emphasised, particularly regarding the involvement of AI tools in academic work.

Responsibility for the final content always remains with the human user. Students and researchers must ensure that AI-assisted outputs meet academic standards and ethical expectations. The document therefore reinforces accountability and user responsibility when integrating AI into academic tasks.

These recommendations directly influence teaching and research practices within the university by establishing expectations regarding disclosure, verification, and responsible AI use. They may also serve as a reference for other higher education institutions that are developing their own institutional AI policies.

While the document establishes clear principles, it does not provide detailed operational guidance regarding assessment design, enforcement mechanisms, or the selection of specific AI tools. Nevertheless, its strong emphasis on transparency, verification, and responsibility offers a useful foundation for integrating AI into academic practice.

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7. University of Maribor – Faculty of Economics and Business (UM FEB) Guidelines on the Use of Generative Artificial Intelligence in Pedagogical and Research Activities

The *Guidelines on the Use of Generative Artificial Intelligence in Pedagogical and Research Activities* adopted by the Faculty of Economics and Business at the University of Maribor define principles for the responsible use of generative AI within teaching and research contexts. The document aims to support the appropriate adoption of AI tools while protecting academic integrity.

The guidelines identify acceptable and non-acceptable uses of generative AI within academic activities and emphasise that AI technologies should support rather than replace human judgement. Responsible use of AI must be aligned with ethical standards and academic integrity principles.

Transparency is a central requirement of the guidelines. Students and researchers are expected to clearly declare when AI tools are used in academic work or scholarly outputs. This requirement helps maintain transparency and ensures that the role of AI in knowledge production is properly acknowledged.

The document also emphasises the importance of maintaining quality and fairness in educational and research activities. Staff and students are encouraged to develop the competencies necessary to understand both the possibilities and limitations of generative AI technologies.

From an ethical perspective, the guidelines highlight the need to consider privacy and confidentiality when using external AI services. Human oversight and verification of AI-generated outputs are required to ensure reliability and to prevent potential misuse.

These guidelines represent a concrete institutional example of how universities can respond to the growing presence of generative AI in higher education. They provide practical orientation for teaching design, assessment practices, and research processes. At the same time, the document illustrates the potential for institutional policies to serve as models that could be expanded or harmonised across faculties and universities within the Slovenian higher education system.

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6. LATVIA

Latvia's approach to artificial intelligence in higher education is currently shaped primarily by strategic policy documents and institutional initiatives rather than by a dedicated national law regulating AI use in universities. The national framework focuses on fostering AI innovation, strengthening research and education capacities, and ensuring that AI development follows ethical and human-centred principles aligned with European and international standards.

At the national policy level, the main strategic document is the ***Informative Report on the Development of Artificial Intelligence Solutions*****,** approved by the Cabinet of Ministers in 2020. The report outlines the current state of AI development in Latvia and identifies priority directions for the integration of artificial intelligence across sectors such as public administration, education, research, and the economy. It emphasises the need to integrate AI topics into education programmes, strengthen interdisciplinary cooperation, and develop competencies required for the future labour market.

The report also highlights the importance of developing AI literacy among professionals and decision-makers and encourages the creation of educational initiatives, including online learning courses and training programmes that would support the development of AI-related knowledge and skills. Higher education institutions are recognised as key actors responsible for strengthening research capacity and preparing specialists capable of working with AI technologies.

An important institutional development is the establishment of the Artificial Intelligence Centre in Latvia. The Centre was created to promote safe, ethical, and innovative development of artificial intelligence and to coordinate cooperation between public administration, academia, and the private sector. Its operation is regulated by the ***Artificial Intelligence Centre Law*****,** adopted by the Latvian Parliament (Saeima). The law defines the structure, governance, and functions of the Centre, positioning it as a national coordination hub for AI-related initiatives and policy development, although it does not regulate AI technologies themselves.

In parallel with national initiatives, several Latvian universities have developed institutional guidelines addressing the responsible use of AI in teaching and learning. Examples include guidelines adopted by universities that emphasise academic integrity, transparency in the use of AI tools, protection of intellectual property, and the continuing role of human oversight in academic work. These documents typically serve as practical recommendations for academic staff and students when integrating AI tools into study processes.

1. Informative Report "On the Development of Artificial Intelligence Solutions" (2020)

The Informative Report "On the Development of Artificial Intelligence Solutions" approved by the Cabinet of Ministers in 2020 represents the main national policy document outlining Latvia's approach to artificial intelligence development. The report provides an overview of the current state of AI development in Latvia and defines priority directions for strengthening the national AI ecosystem across sectors such as public administration, education, research, and the economy.

The document emphasises the importance of developing AI-related competencies within the education system, including both general education and higher education. Universities are expected to contribute to the development of AI specialists, strengthen interdisciplinary research, and integrate AI-related topics into study programmes. The report also highlights the need for flexible curricula, international cooperation, and the development of new learning opportunities that support AI literacy among professionals and decision-makers.

In addition, the report underlines the importance of responsible and human-centred AI development aligned with European and international ethical principles. It highlights issues such as transparency, accountability, data protection, and fairness in AI systems, while also recognising potential risks related to bias, data governance, and cybersecurity.

Although the document provides a strategic framework for AI development in Latvia, it does not establish binding legal obligations. Instead, it serves as a policy guideline that encourages stakeholders, including universities, to develop initiatives supporting AI research, education, and innovation.

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2. Artificial Intelligence Centre Law (2025)

The Artificial Intelligence Centre Law adopted by the Latvian Parliament (Saeima) in 2025 establishes the Artificial Intelligence Centre as a national coordination body responsible for supporting the development and governance of artificial intelligence in Latvia. The law defines the organisational structure, functions, and responsibilities of the Centre and positions it as a national platform for cooperation between public administration, academia, and the private sector.

The primary objective of the Centre is to promote the safe, ethical, and innovative development of artificial intelligence technologies in Latvia. Its activities include strengthening cooperation among stakeholders, supporting AI research and innovation,

promoting knowledge exchange, and contributing to the development of national AI policy initiatives.

The Centre is also expected to contribute to the development of Latvia's AI ecosystem by supporting research and development activities, encouraging the adoption of AI technologies, and promoting international cooperation. Universities and research institutions play an important role within this ecosystem as key partners in AI research, education, and talent development.

While the law establishes an institutional framework for coordinating AI-related activities in Latvia, it does not regulate the use of AI technologies themselves. Instead, it focuses on governance and coordination mechanisms that support the development of AI policies, research initiatives, and innovation activities.

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3. University Guidelines on the Use of Artificial Intelligence in Higher Education

In the absence of a specific national regulation governing the use of artificial intelligence in higher education, several Latvian universities have adopted institutional guidelines addressing the responsible use of AI in teaching and learning processes.

Examples include the Guidelines on the Use of Artificial Intelligence in the Study Process developed by the **University of Latvia** and the Artificial Intelligence in Higher Education Guidelines adopted by **Riga Stradiņš University**. These documents provide recommendations for academic staff and students on how AI tools may be used in study processes while ensuring academic integrity and ethical standards.

The guidelines generally emphasise that AI tools should be used as supportive instruments in learning and research rather than as substitutes for independent intellectual work. They stress the importance of transparency when AI-generated content is used in academic assignments, the responsibility of students and researchers for the final content of their work, and the need for human oversight in academic evaluation and decision-making.

In addition, the guidelines address issues such as data protection, intellectual property, equal access to AI technologies, and the development of digital and AI literacy among students and academic staff. These institutional policies provide practical guidance for integrating AI into teaching and learning while maintaining academic standards and ethical principles.
