Structured Document Review Report (Task 3.1 – KTH)

(For completion by each partner institution as part of WP3 Policy and Regulatory Framework Analysis)

Section 1: Partner & Submission Info

Purpose: To capture basic information about your institution and submission.

Instructions: Please fill in all fields below. Indicate who coordinated the review within your institution.

Partner Institution	Country	Reviewer(s)	Date of Submission
KTH	Sweden	Antonio Maffei Fabio Marco Monetti	28-11-2025

Section 2: List of Documents Reviewed

Purpose: To provide metadata for all documents selected for review.

Instructions: List the 4–6 national and institutional documents your institution analysed. Include official titles and details. Use one line per document.

For each document, provide brief metadata in a table:

Doc ID	Title	Issuing Authority	Year	Type	Scope	Short Description
D8	National approach to artificial intelligence	Government Offices of Sweden	2018	National Strategy / Policy Direction	National	Sweden's national policy direction for AI. Sets goals for AI adoption, skills development, research, innovation, ethics, data infrastructure, and public-sector AI use. Aims to make Sweden a leader in responsible and competitive AI.
D9	Artificial intelligence in Swedish business and society – Analysis of development and potential	Vinnova (Sweden's Innovation Agency)	2018	National Analysis / Policy Report	National	Government-commissioned analysis mapping Sweden's AI readiness, economic potential, opportunities and challenges, sectoral applications, and strategic bottlenecks. Provides national recommendations for industry, public sector, and skills.
D10	Higher Education AI Policies – A Document Analysis of University Guidelines	European Journal of Education (academic research); Author: Niklas Humble (Uppsala University)	2025	Academic Policy Analysis / Research Article	Institutional (University Sector)	Research study analysing AI policies of Swedish universities. Identifies themes in institutional AI guidelines and proposes the DAMHEAP alignment model with strategic, ethical, pedagogical, operational and adaptive dimensions. Provides recommendations for university-level AI governance.
D11	Generative AI in Higher Education – KTH Website Guidelines	KTH Royal Institute of Technology	2023–2024	Institutional Guidelines	Institutional (KTH)	KTH's official guidelines for teachers on the ethical, legal and pedagogical use of generative AI. Includes rules on transparency, GDPR, academic integrity, course-specific AI statements, assessment adjustments, and sustainability considerations. Adapted from DIGG and EU guidelines.
D12	KTH Course-Specific Information, Templates and Usage Instructions for Generative AI	KTH Royal Institute of Technology	2023–2024	Institutional Guidelines / Teaching Resources	Institutional (KTH)	Practical support for teachers: templates for course memos, examples of allowed/prohibited usage, recommendations for communicating with students, assessment adaptations, and legal considerations for using generative AI in learning environments.
E2	AI Report – European Digital Education Hub's Squad on Artificial Intelligence in Education	European Commission (European Digital Education Hub)	2023	EU Policy / Guidance Report	European (EU-wide)	Comprehensive EU report on AI in education. Covers teacher competences, governance, ethics, risk levels, use scenarios, challenges, emerging competencies, and recommendations for European education systems on responsible and effective AI adoption.

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Section 3: Cross-Document Analysis by Category

Purpose: To summarise what the reviewed documents say under each key WP3 category.

Instructions: Use this table to capture relevant extracts or themes found across your reviewed documents.

For all the reviewed documents together, partners summarise findings under each coding category:

D8 — National Approach to Artificial Intelligence (Government Offices of Sweden)

Category	Key Extracts (D8)	Observations
Ethics & Integrity	Calls for "ethical, safe, secure, reliable and transparent" AI; warns against discrimination, bias, manipulated data, unintended consequences (p. 4–5).	Strong emphasis on responsible AI; broad but not operationalised.
Data Privacy & Security	Highlights risks of "lack of transparency, misuse, hostile use," and security/integrity concerns especially in public-sector data (p. 4–6).	Recognises privacy/security as core but provides no detailed mechanisms.
Equity & Inclusion	Notes risk of discrimination; stresses access to skills across society (p. 4–6).	Inclusion mainly framed as skill access, not social equity.
Transparency & Explainability	Calls for transparent AI especially in public services and critical systems (p. 5).	Strategic-level guidance; not technical.
Governance Structures	National approach coordinated across ministries; reliance on public stakeholders to support implementation (p. 5–6).	Governance vision outlined; lacks concrete structures.
Technical Standards & Interoperability	Mentions computational infrastructure and data access requirements (p. 5).	Not explicit on standards; focuses on infrastructure needs.
Accountability & Liability	Emphasises human oversight and managing risks responsibly (p. 4–6).	Responsibility described broadly; no concrete liability framework.
Sustainability	Encourages sustainable AI, environmental and social benefits (p. 5).	Sustainability framed aspirationally but not quantified.

D9 — Artificial Intelligence in Swedish Business and Society (Vinnova Report)

Category	Key Extracts (D9)	Observations
Ethics & Integrity	Identifies risks from biased data, immature solutions, harmful manipulation, ethics concerns (p. 8–11).	More detailed than D8; covers systemic risks.
Data Privacy & Security	Addresses privacy, data ownership, data monopolies, and security threats (p. 9–11).	Strong analytical treatment; no detailed prescriptions.
Equity & Inclusion	Notes labour market disruption, uneven access to data/skills, risk of exclusion (p. 9–12).	Good focus on socioeconomic impacts.

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Transparency & Explainability	Warns against "black box" systems and lack of traceability (p. 9–11).	Acknowledges but does not propose solutions.
Governance Structures	Highlights need for regulatory capacity and system-level policy development (p. 11).	Emphasises governance capability gaps.
Technical Standards & Interoperability	Mentions necessity for high-quality data, model traceability and robustness (p. 10–11).	Implicit standards; no explicit frameworks.
Accountability & Liability	Stresses leadership responsibility in public institutions and companies (p. 9–12).	Focus on organisational accountability.
Sustainability	Notes potential for solving environmental challenges via AI (p. 8–10).	Frames sustainability in terms of opportunity.

D10 — Humble (2025), Higher Education AI Policies — Document Analysis

Category	Key Extracts (D10)	Observations
Ethics & Integrity	Ethical themes: risk management, fairness, responsible use of GAI, academic honesty (entire document).	Very strong ethical focus; central to HE policies.
Data Privacy & Security	GDPR obligations, learning analytics implications, child data protection (p. 3–4).	Strong coverage of regulatory context.
Equity & Inclusion	Concerns over unequal access, bias, exclusion from AI-driven decisions (p. 2–4).	Good alignment with DIGG/EU guidance.
Transparency & Explainability	AI policy requires transparency obligations (e.g., labelling GAI content) (p. 2–3).	Well integrated with EU AI Act transparency rules.
Governance Structures	AI governance frameworks (Institutional theory; DAMHEAP model: strategic, ethical, operational layers) (p. 1–3).	The only document providing a governance model.
Technical Standards & Interoperability	References EU AI Act classification and risk tiers (p. 2).	No explicit technical standards; relies on EU-level.
Accountability & Liability	Emphasises institutional accountability, oversight structures, compliance with AI Act (p. 2–3).	Comprehensive institutional framing.
Sustainability	Notes societal/business impacts of GAI, skill readiness, long-term adaptation needs (p. 1–3).	Indirect but present.

D11 / D12 — KTH Generative AI Guidelines (Institutional)

Category	Key Extracts (D11–12)	Observations
Ethics & Integrity	Human-centric, respectful use; academic honesty; avoidance of bias; maintaining students' genuine skills (p. 1–5).	Strong practical ethical guidance for teachers.
Data Privacy & Security	Clear rules: remove personal data, GDPR compliance, copyright, terms of service, "no training" settings (p. 3–6).	Extremely detailed and practical.
Equity & Inclusion	Notes fairness issues between free vs paid GAI, equal opportunity for students (p. 3–4).	Good pedagogical framing of equity.
Transparency & Explainability	Requires teachers to disclose AI use; students must know rules; course memos must be explicit (p. 1–3).	High transparency standards.

Governance Structures	Based on DIGG + EU guidelines; KTH governance via course memos, E-learning unit, templates (p. 1–3).	Clear, operational institutional governance.
Technical Standards & Interoperability	Not technical standards, but operational standards for use, prompts, human-in-the-loop, etc.	Focus on practice, not engineering standards.
Accountability & Liability	Teacher responsibility for final judgement and correctness; human-in-the-loop (p. 3–4).	Strong human oversight requirement.
Sustainability	Mentions energy consumption and environmental footprint of GAI (p. 2).	One of the few documents citing environmental impact explicitly.

E2 — EU Digital Education Hub AI Report

Category	Key Extracts (E2)	Observations
Ethics & Integrity	AI ethics, human rights, dignity, child-centered AI, fairness, non-discrimination (p. 75–90).	Most comprehensive ethical treatment across the documents.
Data Privacy & Security	Data governance, GDPR duties, privacy violations, technical risk levels (p. 83–90).	Very strong regulatory analysis.
Equity & Inclusion	Addresses accessibility, diverse learners, fairness risks, child rights (p. 7–15; p. 75–90).	Equity and inclusion deeply integrated throughout.
Transparency & Explainability	4-level AI risk categorisation; transparency obligations for AI systems in education (p. 64–75).	Highly aligned with AI Act.
Governance Structures	Education governance, risk-based approach, institutional planning for AI, system-level frameworks (p. 62–75).	Most extensive governance guidance.
Technical Standards & Interoperability	Discusses AI system risk levels, algorithmic robustness, and data quality requirements (p. 64–75).	Most technical document in the set.
Accountability & Liability	Emphasises human oversight, institutional responsibility, AI Act's multi-level accountability (p. 64–75).	Detailed, policy-aligned.
Sustainability	Environmental considerations, human-rights centred design, long-term educational sustainability (p. 76–90).	Integrates sustainability with ethics.

Section 4: Gaps, Overlaps, and Inconsistencies

Purpose: To identify where your national/institutional frameworks are strong, missing, or contradictory.

Instructions: Use bullet points or short paragraphs to describe gaps, overlaps, and inconsistencies. Refer to specific document IDs when possible.

- **Gaps:** Elements not covered in any of the reviewed documents (e.g., no reference to AI in teaching).
- **Overlaps:** Common elements repeated across multiple documents.

- **Inconsistencies:** Conflicts between national vs. institutional policies or contradictions within documents.

Doc ID:	D8 – National Approach to AI (Sweden)
Gaps:	• No concrete guidance on AI in education, teaching, assessment, or academic integrity (covered only by D10, D11/D12). • Lacks operational rules for data governance, GDPR processes, or handling training data (addressed in D11/D12). • No discussion of AI literacy or teacher competences (covered extensively in D10, E2). • No specific measures for equity in digital access or protection of vulnerable groups. • No explicit accountability framework for public institutions deploying AI.
Overlaps	• Strong alignment with D9 on risks: bias, misuse, cybersecurity, labour-market impacts. • Overlaps with E2 on the importance of ethical, safe, transparent AI. • Echoes EU-level goals around competitiveness and innovation.
Inconsistencies	• Compared to D11/D12, D8's principle of "ethical and secure" AI is too general, leading to unclear alignment with the detailed institutional rules KTH imposes. • D8 emphasises economic growth; D11/D12 emphasise academic integrity, which is not mentioned in D8. • No inconsistency, but a different level of granularity creates gaps in implementation at institutional level.
Doc ID:	D9 – Artificial Intelligence in Swedish Business and Society (Vinnova Report)
Gaps:	• Does not address AI in higher education, teaching practices, or generative AI in coursework. • No direct reference to international frameworks such as the EU AI Act (covered strongly in D10, E2). • Missing institutional-level governance mechanisms. • Limited concrete policy tools for implementation.
Overlaps	• Shares D8's emphasis on ethical risks, bias, manipulation, and unintended consequences. • Overlaps with E2 regarding societal impacts, labour-market shifts, and data governance issues. • Aligns with D10 on concerns about skill gaps and need for capacity building.
Inconsistencies	• Tension between promoting rapid innovation and caution around risks—similar tensions surface in D8 but are more pronounced here. • Does not reconcile national economic goals with the ethical/educational concerns held in D10 or D11/D12.
Doc ID:	D10 – Higher Education AI Policies (Humble, 2025)
Gaps:	• Does not provide operational guidelines for course-level implementation (covered by D11/D12). • Does not address national infrastructure (data, compute) raised in D8 and D9. • Limited treatment of environmental sustainability (covered more clearly in D11/D12 and E2).
Overlaps	• Strong alignment with E2 on governance, ethics, transparency, and teacher competence frameworks. • Overlaps with D11/D12 on academic honesty and the need for transparency in GAI use. • Shares with D8 and D9 the recognition of AI's societal risks (bias, manipulation, employment implications).

Inconsistencies	• More critical and pedagogically oriented than Swedish national policy (D8, D9), creating different priorities:
	  ○ D10 emphasises ethics & learning design;
	  ○ D8/D9 emphasise economic growth & competitiveness.
	• Institutional guidelines (D11/D12) are more restrictive than D10's broader conceptual recommendations

Doc ID:	D11/D12 – KTH Generative AI Guidelines (Institutional)
Gaps:	• No reference to national economic or social AI objectives (central in D8/D9).

	• No discussion of the broader societal risks or labour-market consequences (addressed in D8/D9). • No discussion of EU risk taxonomy beyond basic alignment (covered extensively in E2). • Limited discussion of governance beyond the classroom or course level.
Overlaps	• Strongly aligned with D10 on academic integrity, transparency, ethics, fairness, and privacy. • Overlaps with E2 on GDPR, bias mitigation, student protection, risk assessment, and ethical obligations. • Shares with D8 and D9 the concern for safe and responsible AI use, but at more practical level.
Inconsistencies	• KTH rules are more restrictive than national policy, e.g.: • requiring explicit course memos on AI use, not mentioned in D8/D9. • KTH expects immediate compliance with AI Act principles, while national documents lack operational steps. • KTH focuses on academic integrity, whereas D8 and D9 do not address this domain at all.
Doc ID:	E2 – AI Report (EU Digital Education Hub)
Gaps:	• Few national/institutional implementation examples—focuses mainly on EU-wide guidance. • Limited reference to generative AI risks in assessment fraud (covered more concretely in D11/D12). • Does not address national economic competitiveness (central in D8 and D9).
Overlaps	• Strong overlaps with D10 on institutional governance, ethics, teacher competences, and AI literacy. • Overlaps with D11/D12 on transparency, GDPR, student protection, human oversight. • Overlaps with D8/D9 on ethical, secure, safe AI and societal risk management.
Inconsistencies	• EU recommendations assume structured national governance; D8/D9 lack these specifics, creating a misalignment in expectations. • EU risk framework is more detailed than any Swedish institutional framework, including KTH's. • Some EU perspectives (e.g., child-centred AI) are absent in Swedish national documents.

Section 5: Identified Risks

Purpose: To identify any potential ethical, legal, pedagogical, social, or technical risks that emerge from the policies you analysed.

Instructions: List any risks revealed by the documents or by the absence of clear guidance. Indicate whether the institution has a response or mitigation measure.

Risk ID	Description of Risk	Level	Potential Impact	Source Doc ID(s)	Mitigation / Policy Response
R1	Lack of clear operational guidance for AI use in education at national level	High	Institutions left without direction, inconsistent implementation, legal uncertainty	D8, D9	Institutional policies (D11/D12) fill the gap; EU provides detailed guidance (E2).
R2	Bias in AI systems leading to unfair educational or administrative outcomes	High	Discrimination, inequity, unfair grading or admissions decisions	D8, D9, D10, E2	KTH guidelines require human oversight and explicit fairness checks (D11/D12); EU provides bias mitigation frameworks (E2).

R3	Privacy risks from AI tools processing personal or sensitive data	High	GDPR violations, data breaches, reputational damage	D8, D9, D10, D11/D12, E2	KTH requires no personal data be entered into AI systems (D11/D12); EU GDPR and AI Act obligations (E2).
R4	Use of "black-box" models without explainability	Medium–High	Loss of trust, inability to justify educational decisions, legal risks	D8, D9, D10, E2	Transparency requirements in KTH's course memos (D11/D12); EU risk-tier approach (E2).
R5	Academic misconduct facilitated by generative AI	High	Erosion of academic integrity, unreliable assessment outcomes	D10, D11/D12	Clear course-level AI rules, assessment redesign, student communication templates (D11/D12).
R6	Inequality between students with and without access to paid AI tools	Medium	Widening socioeconomic and learning gaps	D11/D12, E2	KTH requires teachers to consider equity in course design and avoid requiring paid tools (D11/D12).
R7	Insufficient AI literacy among teachers	High	Poor teaching decisions, over- or underuse of AI, pedagogical misalignment	D10, E2	Teacher competence frameworks (E2), institutional trainings recommended (D10).
R8	Lack of institutional governance structures for AI	Medium–High	Fragmented practices, compliance failures, risk exposure	D9, D10	D10 proposes DAMHEAP governance model; KTH uses course memos and quality councils (D11/D12).
R9	Overdependence on commercial AI platforms	Medium	Vendor lock-in, sustainability issues, limited control over data	D9, D11/D12	KTH recommends checking ToS, ensuring data minimisation, and using "no training" modes (D11/D12).
R10	Environmental impact of large AI models	Medium	Higher carbon footprint, sustainability conflicts	D8 (broad), D11/D12 (explicit), E2	KTH encourages energy-aware use; EU promotes sustainable AI design (E2).
R11	Misalignment between national innovation goals and educational integrity	Medium	Confusing expectations for institutions; policy contradictions	D8, D9 vs. D10, D11/D12	Institutional guidelines compensate with stricter rules to ensure academic integrity.
R12	Insufficient clarity on accountability when AI fails or causes harm	Medium	Legal ambiguity, institutional risk	D8, D9, D10, E2	EU AI Act (referenced in E2, D10) provides accountability tiers; KTH maintains "human in the loop" requirement.
R13	Lack of unified standards for interoperability and technical quality	Medium	Fragmented AI adoption, inconsistent performance	D8, D9, E2	EU guidance introduces risk-based and quality frameworks (E2).
R14	Emotional or cognitive harm from AI use among students	Low–Medium	Reduced self-efficacy, over-reliance on AI, distorted self-image	E2, D11/D12	EU recommends child-centred and learner-protective AI; KTH emphasises maintaining authentic learning (D11/D12).

Add table rows for each risk identified

Section 6: Additional Checks – Policy Implementation and Adoption

Purpose: To trace how EU-level AI and digital education frameworks are implemented at the national and institutional levels.

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Instructions: Provide short written answers (2–4 sentences per field) explaining how implementation occurs and to what extent.

Check Area	Guiding Question	Partner Assessment / Notes (brief)
Tracking Implementation (EU → National → Institutional)	How do EU-level policies (AI Act, GDPR, DEAP) translate into your national and institutional documents?	EU-level frameworks—particularly **GDPR**, the **AI Act risk-based approach**, and the **Digital Education Action Plan (DEAP)**—are visible in both national and institutional documents, but with different levels of detail. National policies (D8, D9) integrate EU principles mostly at a **conceptual and strategic level**, emphasising ethics, safety, and competitiveness but without operational guidance. Institutional documents (D11/D12) align **much more directly** with EU requirements: explicit GDPR instructions, human-in-the-loop requirements, transparency obligations, and responsible AI use reflect EU guidance as summarised in E2. Overall, EU frameworks influence institutions more strongly than national frameworks do.
Extent of Implementation	Was implementation partial or full? Provide brief reasoning and examples.	Implementation is **partial** at national level and **more complete** at institutional level. National documents (D8, D9) adopt EU principles rhetorically but lack concrete governance structures, technical standards, or compliance mechanisms. In contrast, KTH's institutional guidelines (D11/D12) offer **fully operationalised** implementation: GDPR compliance steps, rules for student use of generative AI, transparency requirements in course memos, and ethical principles aligned with the AI Act and EDEH recommendations (E2). The gap suggests that institutions are compensating for missing national guidance.

Institutional Adoption of AI Regulations	How has your institution implemented or enforced AI-related guidelines (e.g., academic policies, staff guidance, committees)?	KTH has implemented **clear and enforceable policies** for academic AI use, including teacher guidelines, student rules, and course-level declarations (D11/D12). Enforcement occurs through mandatory **course memos**, quality assurance processes, and staff support from pedagogical units. KTH uses EU and national principles but translates them into **practical rules**, such as avoiding personal data in AI tools, ensuring human oversight, designing assessments robust to GAI, and promoting equity of access. Compared to national policy, KTH demonstrates a **higher degree of readiness** and concrete adoption of AI-related regulations.

Section 7: Partner Reflections

Purpose: To gather qualitative reflections and recommendations from each partner.

Instructions: In 1–2 short paragraphs, reflect on the overall strengths and weaknesses of your policy environment regarding AI in higher education and any recommendations for UM to include in the consolidated Policy Analysis Report.

- General comments on the policy landscape in your country/institution.
- Initial recommendations for what should be considered in the Policy Analysis Report.

Overall, the Swedish policy environment around AI shows strong strategic ambition but limited operational depth. National frameworks (D8, D9) emphasise innovation, competitiveness and responsible AI, yet provide little concrete guidance for the higher education sector. As a result, institutions like KTH have moved ahead with more detailed and practical policies (D11/D12), particularly around generative AI, GDPR compliance, transparency requirements, and pedagogical integrity. The institutional guidelines are robust and aligned with EU principles, but national support structures—such as clear governance mechanisms, quality standards, or coordinated teacher-competence frameworks—remain underdeveloped. This creates a gap where institutional policy is more mature than its national counterpart.

For the consolidated Policy Analysis Report, we recommend emphasising the **misalignment between strategic national ambitions and operational institutional needs**. The report should highlight how **EU-level guidance (AI Act, GDPR, DEAP, EDEH)** is currently the main source of concrete direction for higher education institutions in Sweden. It should also identify the need for **national-level implementation tools**, such as common governance frameworks, guidelines for explainability, equity-oriented practices, technical compliance standards, and teacher training infrastructures. Finally, the report should stress the importance of helping institutions navigate the tension between **innovation-oriented national policy** and **integrity-oriented institutional policy**, ensuring that AI adoption supports learning quality, fairness, and responsible practice across higher education.

Submission Instructions

Please complete all sections in this document and submit as a Word or PDF file named: T3.1_PolicyReview_[PartnerName]_[Country].docx by 30 November 2025 via the Teams folder (WP3 → Task 3.1 → Partner Reports).