



Structured Document Review Report (Task 3.1 – UM)

Section 1: Partner & Submission Info

Partner Institution	Country	Reviewer(s)	Date of Submission
University of Malta	Malta	Dr. Joseph Zammit	09/12/2025

Section 2: List of Documents Reviewed

For each document, provide brief metadata in a table:

Doc ID	Title	Issuing Authority	Year	Type (Law/Strategy/Policy /Guideline)	Scope (National/Institutional)	Short Description
D20	Malta Digital 2022-2027 (Digital Strategy)	Ministry of Economy	2022	Strategy	National	This national strategy outlines the vision and goals for Malta's digital transformation journey from 2022 to 2027, aiming to establish digital technologies as the driving force for a better society and a thriving economy.
D21	<i>Digital Education Strategy 2025–2030</i>	DDLTS / Ministry for Education	2024	Strategy / Roadmap	National	This document sets out a clear strategic path and blueprint for systemic change in Malta's educational approach, committing to embedding digital competences across all levels and preparing students and educators to navigate the digital era responsibly.
D22	Malta's National Strategic Action Plan for Further and Higher Education 2022–2030	MFHEA / Ministry for Education	2022	Strategic Plan	National	This plan identifies key trends and drivers for further and higher education in Malta up to 2030, outlining seven strategic pillars and recommendations to build a dynamic, resilient, and quality-driven knowledge ecosystem.
D23	<i>MITA Strategy 2024-2026</i>	MITA	2023	Strategy	National	This strategy outlines the Malta Information Technology Agency's (MITA) direction over three years to facilitate the modernisation of the Public Administration through technology direction and digital solutions, focusing on infrastructure, partnerships, and internal strength.
D24	University of Malta Strategic Plan 2020-2025	University of Malta	2020	Strategic Plan	Institutional	This plan outlines the University of Malta's vision, mission, and eight strategic themes—including Learning and Teaching, Research, and Sustainability—to guide its operations from 2020 to 2025.
D25	<i>Guidelines for Academic Staff on the use of Generative AI Tools in Class and in Assessments</i>	University of Malta	2023	Guidelines	Institutional	This document provides guidance for University of Malta academic staff on when and how to permit students to use Generative AI tools in teaching, learning, and assessment while safeguarding academic rigour and integrity.
E4	Living guidelines on the responsible use of generative AI in research	European Commission	2025	Guidelines	EU	These are non-binding recommendations from the ERA Forum intended to support researchers, research organisations, and funding bodies in the responsible, transparent, and accountable use of Generative AI in research, building on principles of research integrity and trustworthy AI



Section 3: Cross-Document Analysis by Category

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

Document	D20: Malta Digitali 2022-2027 (Digital Strategy)	
Category	Key Extracts	Observations (coverage, strengths, weaknesses)
Ethics & Integrity	Digital service developers should focus on building trust and confidence. The strategy aligns with EU legislation, including the Artificial Intelligence Act. The vision is guided by ethical responsibility.	Coverage: Focuses on integrity from the user's perspective (trust in government systems). Strength: Identifies a lack of trust as a major inhibitor to digital adoption, mandating mitigation through secure systems. AI Impact: Commits to adhering to the regulatory principles of the EU AI Act.
Data Privacy & Security	Developers must engender trust in how personal information is accessed, shared and used. Action 31 involves implementing the Once-Only Principle (OOP), respecting data protection regulations. The strategy ensures alignment with EU legislation, including the Data Governance Act.	Coverage: High focus on securing personal information and adhering to EU data legislation. Strength: The OOP implementation requires robust data protection mechanisms, which is essential for governing the data used to train or operate government AI services. Weakness: Focuses on data sharing governance rather than proprietary GenAI input risks.
Equity & Inclusion	The goal is to further narrow the digital divide and assist underserved segments of society. Inclusivity requires ensuring tools, connectivity and skills are available to all, regardless of people's backgrounds or circumstances. This uses a persona-driven approach, including the Elderly and Vulnerable citizens.	Coverage: Highly comprehensive, using a persona-driven approach to identify granular inclusion needs across society. Strength: Explicitly recognises that AI-driven services must consider the needs of vulnerable groups and address the digital divide. AI Impact: AI tools must be accessible and designed with vulnerable personas in mind to avoid exclusion.
Transparency & Explainability	Digital ecosystem coherence necessitates transparent dialogue with the market. Action 31 involves encouraging open data while empowering citizens in terms of their data.	Coverage: Strong commitment to government transparency and data accessibility. Strength: Open data is viewed as a crucial mechanism for enhancing trust and fostering innovation in the private sector. Weakness: High-level strategic goal; actual utility depends on the quality and volume of data released, and does not address algorithmic explainability.
Governance Structures	The strategy provides the overall strategic direction for future national and sectoral strategies (Cybersecurity, Data, eSkills). Implementation will be spearheaded by	Coverage: Establishes the high-level policy framework for digital governance across the nation. Strength: Ensures alignment of all



	the Ministry responsible for the Digital Economy, ensuring a holistic approach.	subsequent digital strategies with the overarching national economic vision, including the Malta AI Strategy (2019). AI Impact: Sets the mandatory context for all AI-related sectoral strategies (e.g., in health, education).
Technical Standards & Interoperability	Principles mandate designing solutions that are interoperable, scalable and that share and re-use software, services, and data. Strategy aligns with EU-driven legislative acts including the Artificial Intelligence Act and the Data Governance Act.	Coverage: Strong focus on national and cross-border interoperability. Strength: Interoperability is a core technical design principle for all government digital services, ensuring systems can communicate data needed for cross-sectoral AI applications.
Accountability & Liability	Public Service Strategy targets service of excellence based on quality, accountability, and sustainability. Digitalisation could enable more informed decision-making through tools that provide real-time monitoring and measurement.	Coverage: Links accountability to measurable public service quality. Strength: Commitment to implementing systems (continuous monitoring) to measure and monitor service provision quality (Action 27). Weakness: Focuses on institutional performance rather than on legal liability for technological failure.
Sustainability	Sustainability is a guiding principle. Digital solutions should be harnessed to drive the sustainable transition of Malta's economy and society. Action 42 commits to tackling e-waste by enacting a plan to meet EU directives.	Coverage: Comprehensive, addressing both the strategic goal (green transition) and operational waste management. Strength: Direct commitment to an explicit environmental action (tackling e-waste). AI Impact: Digitalisation, including AI adoption, is viewed as a necessary tool to drive sustainability and the green economy.

Document	D21: Digital Education Strategy 2025–2030	
Category	Key Extracts	Observations (coverage, strengths, weaknesses)
Ethics & Integrity	The strategy underscores the urgency of preparing both educators and students to navigate the complexities of the digital era responsibly and to make ethical decisions. Pillar 1 aims to help learners become Digital Global Citizens. A comprehensive digital safety and ethics policy for schools that covers AI, social media, and devices will be developed by September 2025.	Coverage: Focuses on establishing foundational AI ethics and responsible use from an early age (K-12). Strength: Proactively integrates AI use and ethical consumption into formal education, committing to a specific AI ethics policy deadline. AI Impact: Pillar 1 aims to introduce advanced tools like AI to primary and secondary students, focusing on practical applications and ethical use.
Data Privacy & Security	Action 1.4.1 aims at protecting privacy and security. The implementation of a single sign-on system will require collaboration with the MEYR legal team to	Coverage: Links privacy protection directly to eSafety and platform integration. Strength: Explicitly requires legal oversight to ensure compliance when integrating



	ensure that all integrations comply with privacy policies.	online tools, which is critical when adopting new digital resources (like GenAI-powered learning platforms). Weakness: General strategic intent for K-12, lacking HEI-specific data governance details.
Equity & Inclusion	This Strategy is a commitment guiding us towards a future where digital competencies are embedded, ensuring equal access to high-quality digital education. Aims to address the digital divide and promote diversity in ICT careers.	Coverage: Extensive, making equity a core guiding principle for all digital adoption, including AI. Strength: Mandates initiatives to bridge the digital divide through hardware provision ("One Device Per Child") and actions to address the gender gap in ICT careers. AI Impact: Ensures that future AI tools used in education are deployed equitably to uplift every learner.
Transparency & Explainability	A clear framework will be developed to guide the procurement of education-related digital software, ensuring alignment with educational needs and review by both curriculum and technical experts. The strategy aims to enhance its online presence, serving as a gateway to effective communication and transparency.	Coverage: Focuses on institutional transparency regarding resource management and policy. Strength: Commits to a transparent procurement framework for digital software, ensuring purchases meet technical and pedagogical needs before deployment. Weakness: Does not address AI explainability or transparency of algorithmic decision-making.
Governance Structures	The strategy has 50 strategic actions which are pegged to a plan indicating when, how and who is responsible. An Inter-Ministerial Committee and a working group with representatives from independent, church, and state schools, as well as other stakeholders, will be formed to share updates on strategy and new technologies.	Coverage: Comprehensive framework spanning educational, community, and inter-ministerial levels. Strength: Clear implementation structure with roles and responsibilities defined for all strategic actions. AI Impact: These structures are responsible for developing the AI ethics policy and managing the systematic introduction of AI tools (Action 1.1.3).
Technical Standards & Interoperability	Mandates the implementation of a single sign-on system with integrated third-party software. Action 4.2.3 requires the procurement of digital software to be reviewed by curriculum and technical experts.	Coverage: Focuses on the infrastructure necessary to integrate digital tools seamlessly and securely. Strength: Implementation of single sign-on enhances interoperability and simplifies access across various learning platforms for users. AI Impact: Ensures that any procured GenAI learning tools adhere to robust procurement and privacy standards.
Accountability & Liability	Accountability is a central component of good governance. The strategy will be systematically monitored and evaluated.	Coverage: Organisational and governance accountability related to strategy execution. Strength: A Clear monitoring and



	The commitment is based on clear assignment of roles and responsibilities.	evaluation plan ensures that responsible entities are held accountable for strategic outcomes. Weakness: Limited to institutional accountability for strategy implementation, not legal liability for AI failure.
Sustainability	The strategy aims to align education with Malta's Sustainable Vision 2050 by identifying and nurturing skills essential to the digital and green economies. Action 1.5.1 highlights showcasing teaching opportunities in emerging roles, particularly in the green and blue sectors, integrating digital literacy and AI tools.	Coverage: Focused on contributing skills to the green economy transition. Strength: Explicitly links the digital education mandate and the use of AI tools to wider national sustainability and career relevance goals. Weakness: Focuses on skills supply rather than the environmental management of the institution's own IT infrastructure.

Document	D22: National Strategic Action Plan for Further and Higher Education 2022–2030	
Category	Key Extracts	Observations (coverage, strengths, weaknesses)
Ethics & Integrity	Ensure a strong, ethical, high-quality educational community. Pillar 5 focuses on placing greater emphasis on values and social economy principles. Recommendation 5.5 mandates the establishment of a Task Group on Values and Ethics in the FHE (Further and Higher Education) sector.	Coverage: High-level strategic recognition of the necessity of ethics and values for institutional resilience. Strength: Formal action is planned through the mandated Task Group, which must define ethical principles for FHE in response to emerging challenges like AI. Weakness: Policy is aspirational; relies on the Task Group to define and implement practical measures (e.g., addressing AI plagiarism beyond the general concept of ethics).
Data Privacy & Security	Effective education policies require providing appropriate support in the form of guidelines and standards, including those related to data protection.	Coverage: Minimal. Acknowledges data protection as a basic component of digital education support. Strength: Recognises that digital tools, including AI, require established policy standards. Weakness: Extremely high-level mention, lacking detail or corresponding strategic actions.
Equity & Inclusion	Aims for equitable further and higher education, ensuring people, irrespective of socio-economic factors, have an equal chance of attainment. Pillar 6 focuses on the Social Dimension: Widening Participation and Adult Learning. There is a persisting gender gap evident in STEM programmes at the higher education level. The goal is to achieve 80% of the	Coverage: Comprehensive coverage of social barriers, lifelong learning, and gender disparities in FHE. Strength: Promotes equity by addressing the need to achieve basic digital skills society-wide, necessary for utilising new technologies like AI.



	population with at least basic digital skills by 2030.	
Transparency & Explainability	Pillar 4 focuses on Robust Quality Assurance and Transparency. The strategy mandates the launch of reviews and data collection to support the use of more evidence-based policy approaches.	Coverage: Focuses on increasing institutional transparency regarding performance, quality assurance, and governance. Strength: Requires systematic monitoring, evaluation, and data collection to ensure that policy actions (including those related to AI education) are evidence-based. Weakness: Does not address the transparency or explainability of digital technologies themselves.
Governance Structures	Pillar 1 focuses on Joined-up Policy Design and Governance, aiming to reduce fragmentation and policy silos. Recommendations include setting up a National Coordination Mechanism on Emerging Opportunities.	Coverage: Highly focused on improving national governance coherence for emerging technologies. Strength: Proactively identifies policy fragmentation/silos as a core institutional weakness and mandates the creation of high-level coordinating bodies to resolve this, essential for managing cross-sectoral technologies like AI. AI Impact: This mechanism is key for developing anticipatory and coherent policies regarding "future digital technologies".
Technical Standards & Interoperability	Key technologies with potential to revolutionise learning are: Artificial intelligence (and big data), Augmented and Virtual Reality, and Blockchain.	Coverage: Addresses the adoption of emerging technology, focusing on its potential impact on FHE content and methods. Strength: Recognition of advanced digital tools (AI) as drivers for hyper-personalised learning and vocational education. Weakness: Strategic goal for adoption; does not specify technical standards for infrastructure development.
Accountability & Liability	The FHE Vision is based on principles, including clear assignment of roles and responsibilities. Proposes financially rewarding HEIs that meet defined social objectives.	Coverage: Institutional accountability linked to performance and resource management. Strength: Proposes using public funding mechanisms to incentivise increased accountability and measured performance outcomes in FHE providers. Weakness: Does not address accountability related to technological adoption or errors.
Sustainability	Vision includes contributing towards a fair, digital and green economy. The strategy aims to enhance the relevance of education to support the green, digital, and societal transitions ahead.	Coverage: High-level strategic commitment to aligning the FHE sector with national and EU sustainability goals. Strength: Positions the FHE sector as instrumental in driving the necessary skills transition for the future green economy. Weakness: Strategic in nature; lacks



		detailed operational actions for FHE providers to reduce their carbon footprint.
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Document	D23: MITA Strategy 2024-2026	
Category	Key Extracts	Observations (coverage, strengths, weaknesses)
Ethics & Integrity	Research funding organisations must use Generative AI transparently in their internal processes, particularly for activities related to assessment and evaluation management, without compromising fairness or the confidentiality of content. Guiding principle: Always practice good governance.	Coverage: Addresses the ethical deployment of AI in internal governance processes (e.g., funding assessments). Strength: Commits to ensuring that the use of AI in internal management does not compromise fairness or confidentiality. Weakness: The commitment relates to internal use within MITA/PA (Public Administration), not external research integrity.
Data Privacy & Security	Guiding principle: Adopt security and privacy by design. MITA adopts a zero-trust approach and operates a comprehensive framework to protect the Government's digital assets. MITA is nominated as the National Coordination Centre for Malta (MITA NCC) for cybersecurity.	Coverage: Extensive and prioritised focus on technical and organisational security necessary to support any sensitive AI deployment. Strength: Adopts best practices such as security and privacy by design, enhancing cyber-resilience. Weakness: While foundational security is covered, specific data-leakage prevention for GenAI inputs in PA operations is not detailed.
Equity & Inclusion	The EU's Digital Decade targets cover digital skills and ensuring safe, secure, inclusive participation by all. MITA promotes a workplace culture that prioritises employee well-being, engagement, and diversity.	Coverage: Links inclusion to adherence to EU goals and internal organisational culture. Strength: Acknowledges the EU mandate for inclusive digital participation. AI Impact: Ensures that the core technical body facilitating government digitalisation (MITA) is internally focused on diversity.
Transparency & Explainability	MITA will use Generative AI transparently in its internal processes. Management will be provided with dashboards having enhanced decision-making capabilities.	Coverage: Addresses both internal transparency and the transparent use of AI tools in public administration. Strength: Commitment to enhancing transparency and internal controls through dashboards and data-driven management. Weakness: The transparent use of AI in internal processes must strictly avoid compromising confidentiality.
Governance Structures	MITA's mission is to facilitate the modernisation of the Public Administration through technology direction and digital solutions. It assists the PA in strengthening compliance with the ICT policy suite and strengthens	Coverage: Defines MITA's role as the central technical partner enabling PA modernisation and governance. Strength: Commits to aligning technical policy with high-level PA governance (Digitalisation Committee) and





	governance structures to improve accountability and internal controls.	implementing process improvements for efficiency. AI Impact: MITA is responsible for guiding the PA's adoption of EU AI regulation.
Technical Standards & Interoperability	The European landscape is evolving rapidly with legislation on interoperability and the Interoperable Europe Act. MITA will implement a technical interoperability platform (service bus) to enable data exchange across public administration systems. Guiding principle: Adopt technology-agnostic and cloud-native architectures.	Coverage: Comprehensive technical strategy driven by EU legislative mandates. Strength: Commitment to best practices (cloud-native) and specific actions (interoperability platform) to ensure seamless data exchange across the PA. AI Impact: This strong focus on standardised data exchange is the necessary technical foundation for secure AI service deployment.
Accountability & Liability	Research funding organisations remain fully responsible for the use of generative AI in their activities, in line with the accountability principle that emphasises responsibility and human oversight. Governance structures will be strengthened to enhance decision-making and accountability.	Coverage: Organisational accountability and alignment with the principle of human agency over technology. Strength: Clearly states that AI use in public administration processes must adhere to human oversight. Weakness: High-level strategic goal, requiring detailed process definition for effective liability and accountability mechanisms.
Sustainability	Sustainability is a corporate driver. MITA will invest in the technological modernisation of its data centre using green technology and energy-efficient solutions. MITA aims for certification in ISO 14001: Environmental Management System.	Coverage: Strong focus on the environmental impact of IT infrastructure and organisational processes. Strength: Commits to measurable goals through specific investments in green/energy-efficient technology for the data centre. AI Impact: Ensures the core technical foundation for AI processing (data centres) adheres to environmental sustainability standards.

Document	D24: University of Malta Strategic Plan 2020-2025	
Category	Key Extracts	Observations (coverage, strengths, weaknesses)
Ethics & Integrity	Committed to values of good governance, accountability, equality and social responsibility. Strategic Theme 2 requires undertaking Responsible Research, Integrity and Ethics, including setting up a Committee for Research Engagement and a Research Integrity Office.	Coverage: Strong high-level commitment to embedding research integrity and ethics across the institution. Strength: Mandates the creation of specific structures (Research Integrity Office) to manage ethical compliance and complex research issues. Weakness: Document written before the GenAI boom, so it lacks targeted discussion on AI authorship or assessment integrity (addressed by Document D25).





Data Privacy & Security	Theme 8 aims to Achieve Excellence in Technology-based Services by ensuring robust, resilient and efficient technology platforms.	Coverage: General coverage focused on achieving operational IT resilience. Strength: Commitment to modernising IT and achieving excellence in supporting services. Weakness: Does not specifically mention data privacy, GDPR, or cybersecurity as core strategic themes, nor does it address GenAI data security risks, likely due to its drafting date (2020).
Equity & Inclusion	Theme 3: Creating an Inclusive University for an Inclusive Society. Actions include support for Under-Represented and First-Generation Students; ensuring access for Diverse Cultures; and assisting students and staff with disability.	Coverage: Comprehensive institutional inclusion strategy targeting multiple underrepresented groups. Strength: Commits to specific support mechanisms (e.g., ADSU offices, buddy system) to ensure equity of access. AI Impact: Provides the foundational commitment necessary to ensure future AI integration is managed to support diverse learners.
Transparency & Explainability	Committed to the values of accountability. A transparent and systematic process evaluates resource allocation. The library aims to disseminate the research output.	Coverage: Focuses on institutional transparency regarding governance and research dissemination. Strength: Commits to evidence-based management and transparent processes. Weakness: Does not incorporate specific goals for algorithmic transparency or data processing visibility, focusing instead on governance and research dissemination.
Governance Structures	Committed to the values of good governance and institutional autonomy. Theme 8 seeks to create Synergy and Efficiency across administrative directorates to avoid duplicating programmes, resources, and costs.	Coverage: Focused on internal institutional governance, autonomy, and administrative efficiency. Strength: Aims to streamline administrative processes (e.g., digitising manual processes, automating systems) to create a more efficient support ecosystem. Weakness: Lacks the explicit inter-ministerial coordination focus seen in the national strategies.
Technical Standards & Interoperability	IT services should align with the ITIL best-practice management framework and ensure robust, resilient and efficient technology platforms.	Coverage: Focuses on internal IT service management standards. Strength: Adoption of professional IT management standards (ITIL) increases the stability and reliability of technology platforms supporting learning and research. Weakness: Does not explicitly address external or cross-institutional interoperability requirements (e.g., national data standards).



Accountability & Liability	Committed to the values of accountability. Theme 2 mandates an organisational structure (Research Integrity Office) for Responsible Research. A transparent and systematic process evaluates resource allocation.	Coverage: Foundational commitment to accountability in governance, resource management, and research. Strength: Commits to evidence-based management and robust research integrity structures. Weakness: Lacks specific mechanisms for assessing liability related to digital systems or emerging technologies like AI.
Sustainability	Committed to serving society in a sustainable manner. Theme 7 is Sustainability, covering measures to reduce, reuse, and recycle waste (including eliminating single-use plastic), extend Energy Efficient Measures, and Conserve Water.	Coverage: Comprehensive coverage of environmental sustainability integrated into physical infrastructure and operations. Strength: Focuses on measurable, practical actions such as achieving nearly-zero-energy targets for buildings. Weakness: Focuses on the physical campus footprint rather than directly addressing the energy consumption of digital research (e.g., training large AI models).

Document	D25: Guidelines for Academic Staff on the Use of Generative AI Tools in Class and in Assessments	
Category	Key Extracts	Observations (coverage, strengths, weaknesses)
Ethics & Integrity	These guidelines are intended to achieve the ethical use of AI and maintain academic rigour and integrity. The University also considers the unacknowledged use of work generated by AI tools to be plagiarism. If substantial use is permitted in summative assessments, students should clearly acknowledge their use.	Coverage: High focus on academic integrity in teaching and assessment. Strength: Clearly defines unauthorised use of GenAI output as plagiarism, providing a strong basis for disciplinary action. Weakness: The guidelines require staff to be familiar with ethical issues, such as bias, but provide no mechanism for mitigation beyond caution.
Data Privacy & Security	All University staff should be especially careful not to include any sensitive information in their prompts due to privacy and data protection concerns. Tools like ChatGPT keep a history of all prompts entered by the user, which could be used to better train the system.	Coverage: Strong practical warning for staff about the risks inherent in using commercial GenAI tools. Strength: Clearly explains the privacy risks associated with proprietary models (history logging, employee access, model training). Weakness: Policy relies entirely on user caution rather than institutional technical controls over data entry.
Equity & Inclusion	Academics should be familiar with the limitations and associated ethical issues of Generative AI tools (e.g., potential for bias). Students are encouraged to use AI tools (unacknowledged) to aid with comprehension, language, spelling, and grammar.	Coverage: Acknowledges bias as an ethical concern for academics. Strength: Allows unacknowledged use for basic language/comprehension tasks, potentially supporting students with diverse linguistic or learning needs. Weakness: Provides no institutional



		strategy or specific training on mitigating bias in academic output.
Transparency & Explainability	Lecturers should make it clear how students should acknowledge the use of Generative AI in any submitted work. Students should be encouraged to keep copies of their drafts and notes to help show the originality of their work.	Coverage: Focused on transparency regarding authorship and provenance of student work. Strength: Provides citation examples and mechanisms (drafts/notes) for students to verify the human creative process. Weakness: Confined to academic declaration rather than addressing the need for algorithmic transparency.
Governance Structures	It is up to the individual lecturers, in consultation with the Board of Examiners and/or the Board of Studies, to determine if and how the use of Generative AI tools should be permitted. The guidelines will be reviewed as necessary as Generative AI technologies continue to evolve.	Coverage: Decentralised pedagogical governance, granting flexibility to the faculty/department level to adapt policy based on different requirements of the various disciplines. Weakness: Risks creating institutional inconsistencies in policy application and enforcement standards across the University.
Technical Standards & Interoperability	<i>No relevant extracts found in the sources.</i>	Coverage: Not addressed in the excerpts.
Accountability & Liability	If there is suspicion that a submitted work includes unacknowledged or forbidden AI-generated contributions, the student shall be called for an oral examination. AI writing detection tools are discouraged and cannot be used as proof for disciplinary procedures.	Coverage: Strong focus on student accountability for submitted academic work. Strength: Establishes a clear, human-led disciplinary process (oral examination), recognising the need for human oversight to confirm authorship due to the unreliability of detection software. AI Impact: Acknowledges that reliance on AI detection tools is insufficient for liability determination.
Sustainability	<i>No relevant extracts found in the sources.</i>	Coverage: Not addressed in the excerpts.

Document	E4: Living guidelines on the responsible use of generative AI in research	
Category	Key Extracts	Observations (coverage, strengths, weaknesses)
Ethics & Integrity	The core principles of Reliability, Honesty, Respect, and Accountability frame the guidelines. Researchers are accountable for the integrity of content generated by AI, which must not be fabricated, falsified, or plagiarised. Researchers must refrain from using generative AI tools extensively in sensitive activities that could affect other researchers, such as peer review or the evaluation of research proposals.	Coverage: Highly specific to GenAI's impact on research ethics and integrity. Strength: Explicitly states AI systems are neither authors nor co-authors and bans substantial use in integrity-critical activities like peer review. Weakness: Adherence relies heavily on researchers' self-disclosure and interpretation of what constitutes "substantial use".



Data Privacy & Security	Compliance with EU data protection rules (GDPR) is mandatory. Researchers must protect unpublished or sensitive work by taking care not to upload it to an external AI system unless they have assurances that the data will not be reused. Research organisations should, whenever possible and necessary, implement locally hosted or cloud-based Generative AI tools that they govern themselves to ensure data protection and confidentiality.	Coverage: Strong, directly mitigating privacy risks inherent in proprietary GenAI tools. Strength: Recommends the technical solution of institutional control (locally hosted tools) as the best practice for protecting confidential scientific data. Weakness: Acknowledges that obtaining guarantees of non-reuse from commercial providers is difficult.
Equity & Inclusion	The principle of Reliability requires researchers to be aware of potential equality and non-discrimination issues arising from bias and inaccuracies. Researchers should disclose or discuss the limitations of GenAI tools used, including possible biases in the generated content.	Coverage: Focuses narrowly on mitigating inherent model bias as a factor of reliability and trustworthiness. Strength: Directly links bias awareness to the core principles of trustworthy research.
Transparency & Explainability	Researchers, to be transparent, must detail which generative AI tools have been used substantially in their research processes, including the name, version, date, and how it affected the research. Researchers must also disclose or discuss the limitations of the GenAI tools used. GenAI models operate as "black boxes," making it difficult to understand how specific responses are generated.	Coverage: Sets a high standard for methodological transparency required for reproducibility. Strength: Mandates disclosure of technical details (version, date) and methodology. AI Impact: Explicitly recognises the lack of Interpretability of AI models, emphasising that disclosure is required because models operate as "black boxes".
Governance Structures	Provides explicit recommendations for Researchers, Research Organisations, and Research Funding Organisations. Research organisations should integrate these GenAI guidelines into their broader research guidelines to promote good research practices and ethics.	Coverage: Defines governance roles across the entire research ecosystem (funders, institutions, researchers). Strength: Promotes a harmonised framework while allowing institutions to adapt the guidelines to their specific context. Weakness: These are non-binding "living guidelines" that require proactive institutional adoption for enforcement.
Technical Standards & Interoperability	Final research output shall follow the FAIR principles (Findable, Accessible, Interoperable, Reusable) and be machine-actionable. Research organisations should implement locally hosted or cloud-based Generative AI tools that they govern themselves.	Coverage: Sets technical standards for AI-related data/research output (FAIR principles) and infrastructure hosting. Strength: Mandates adherence to internationally recognised FAIR principles for research data, maximising reusability and interoperability of results. AI Impact: Institutional hosting of GenAI tools is the standard for secure data processing.
Accountability & Liability	Researchers remain ultimately responsible for scientific output. AI systems are neither authors nor co-authors; authorship implies agency and responsibility, which rests with human	Coverage: Excellent, clearly defining human accountability in the research process. Strength: Clearly separates human agency



	researchers. Research funding organisations remain fully responsible for the use of generative AI in their activities, in line with the accountability principle that emphasises human oversight.	from AI contribution, ensuring that AI cannot be used as a scapegoat for errors.
Sustainability	The principle of Respect includes considering the environmental impact of technology. Researchers should aim at minimising the environmental impact of generative AI by evaluating tool suitability and using the most effective prompting techniques (green prompting).	Coverage: Explicitly addresses the environmental sustainability of GenAI tools. Strength: Introduces the specific concept of green prompting, using AI efficiently, as a necessary part of responsible research practice. AI Impact: Directly links responsible AI adoption to measurable environmental performance.

Section 4: Gaps, Overlaps, and Inconsistencies

- **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:	D20: Malta Digitali 2022-2027 (Digital Strategy)	
	Finding	Details Focused on AI/GenAI
Gaps:	Dedicated HEI/FHE Policy Support: While the strategy acknowledges the need for R&I investment and attracting academic institutions, it does not include dedicated, ring-fenced national funding or support measures for HEIs/FHE institutions to purchase or host their own secure GenAI systems (as recommended by E4).	Investment focus is broad (digital economy, innovation hub), without prioritising the significant technological and financial shift required for secure academic/research use of AI.
	Specific AI Ethics and Governance beyond the AI Act: The document commits to aligning with the EU Artificial Intelligence Act but lacks specific national or HEI-focused policy on algorithmic bias assessment, AI procurement guidelines, or IP liability within the public service context.	Reliance on the EU AI Act means that specific, proactive national governance actions for local HEIs (beyond broad R&I goals) are still required to meet ethical standards.
Overlaps	Alignment with EU Legislative Frameworks: Commits to aligning with EU digital policies, strategies, and legislative acts, including the Artificial Intelligence Act and the Data Governance Act.	This commitment aligns with the direction set by the ERA Guidelines (E4) and the MITA Strategy (D23), ensuring a consistent legal foundation for AI across the island.
	Digital and Green Economy Focus: Explicitly harnesses digital solutions to drive the sustainable transition of Malta's economy and society.	This core strategic commitment to aligning digital transformation with the green economy overlaps strongly with the MFHEA (D22) and DDLTS (D21) strategies.
Inconsistencies	Data Sharing Imperative vs. Data Protection Restriction: The strategic goal is to implement the Once-Only Principle (OOP), encouraging government entities to share and reuse data internally and across borders.	Tension: This clashes with the strict data protection instructions given in the ERA (E4) and UM (D25) guidelines, which warn researchers not to upload sensitive data to external AI systems. The national digital



		infrastructure mandate (D20) prioritises data flow, while academic/research integrity policy (E4, D25) mandates data restriction.
Doc ID:	D21: Digital Education Strategy 2025–2030	
	Finding	Details Focused on AI/GenAI
Gaps:	HEI/FHE Specific Policy and Governance: Lacks explicit strategic detail on governance structures, resource allocation, and curriculum reform for Further and Higher Education (FHE).	This strategy is highly focused on pre-secondary education (ECEC, Primary, Secondary), resulting in a governance gap for managing AI integration and ethics at the University and vocational level, which is the direct focus of WP3.
	Addressing GenAI in FHE Research/Assessment: Contains no policy on research integrity, authorship, or plagiarism detection specifically for FHE/HEI students and researchers.	The focus is on foundational digital safety for school students (netiquette, identifying fake news) and introducing AI applications to Year 6 students, but it does not address the complexity of scholarly integrity addressed in the UM/ERA (E4, D25) documents.
Overlaps	Addressing Bias and Ethics: Shares the concern expressed in the ERA Guidelines (E4) and UM Guidelines (D25) regarding the need to instil ethical decision-making and ensure learners navigate the digital era responsibly.	This strategic intent establishes a common objective for developing responsible digital citizens who understand the ethical dimensions of technology use.
	Alignment with EU Digital Decade Targets: Explicitly aligns with the EU's Digital Decade goals, particularly the target of achieving 80% basic digital skills among adults, also mentioned in the MFHEA plan (D22).	This commitment to EU-level digital skills targets ensures national efforts are federally aligned.
Inconsistencies	HEI Policy Gaps vs. K-12 Detail (Contradiction): Provides highly detailed, time-bound actions for AI integration in K-12 education, such as developing a comprehensive digital safety and ethics policy for schools covering AI by September 2025 and introducing AI tools to Year 6 students by 2026.	Contradiction: This level of specific, time-bound commitment to foundational AI ethics in schools highlights the lack of corresponding, detailed, time-bound strategic guidance for the HEI/FHE sector in documents (D24) and (D22).
Doc ID:	D22: National Strategic Action Plan for Further and Higher Education 2022–2030	
	Finding	Details Focused on AI/GenAI
Gaps:	Detailed Pedagogical Models for HEI: Lacks specific policy guidance or frameworks for ethical and effective GenAI integration in HEI teaching methodologies, beyond general references to AI's potential.	The plan identifies Artificial Intelligence (and big data) as key technologies with the potential to revolutionise learning. Still, it does not offer an actionable roadmap on how HEIs should integrate AI into curricula, assessment, or research practice.
	AI Governance Structure Implementation: While Recommendation 5.5 mandates a Task Group on Values and Ethics in the FHE sector, the document was written before this group's formation and action plan.	This creates a current gap in an operational ethics and values framework that directly addresses AI challenges such as academic integrity and bias within FHE, making it a priority for WP3 to inform this structure.
Overlaps	Digital and Green Economy Focus: Consistently links digital advancement (including AI) to Malta's commitment to achieving a digital and green economy.	This strategic goal aligns with both the Malta Digital Strategy (D20) and the DDLTS Strategy (D21).
	Alignment with EU Digital Decade Targets: Acknowledges the need to achieve the EU target of 80% of the population having at least basic digital skills by 2030, consistent with the DDLTS Strategy (D21).	This shows consensus on the core national digital skills objective necessary for wide AI adoption.
	Joined-up Policy Governance: Identifies fragmentation and policy silos as a core	Both national strategies recognise that emerging technologies like AI require joined-



	weakness and mandates the creation of structures such as a National Coordination Mechanism on Emerging Opportunities, aligning with the multi-stakeholder governance proposed in the DDLTS Strategy (D21).	up policy design across ministries (Education, Digital, R&I).
Inconsistencies	HEI Policy Gaps vs. K-12 Detail: Treats AI generally as an emerging opportunity (Pillar 2), focusing on enhancing relevance and establishing a future Ethics Task Group.	Contradiction: This general, aspirational focus contrasts with the highly specific, detailed, and immediate actions mandated for AI in the DDLTS Strategy (D21) targeting younger learners.
Doc ID:	D23: MITA Strategy 2024-2026	
	Finding	Details Focused on AI/GenAI
Gaps:	HEI-Specific Collaboration Focus: While MITA commits to fostering relationships with local and international technology providers and academic institutions, the strategy does not detail specific actions or programs designed to support the FHE/HEI sector's digital transformation challenges (e.g., procurement of secure teaching tools, secure research data analytics infrastructure).	The focus is primarily on supporting the Public Administration (PA). Any benefit to HEIs is indirect, highlighting a missing layer of targeted collaboration or service provision to FHE entities.
	Algorithmic Bias in PA Processes: The strategy is silent on mechanisms to proactively identify and mitigate algorithmic bias in AI use for internal PA processes, such as assessment management, funding evaluation, or resource allocation.	While transparency and fairness are mentioned, specific commitments to bias detection, model auditing, or non-discrimination requirements for internal AI tools are absent.
Overlaps	Human Accountability and Oversight: Aligns with the ERA Guidelines (E4) in emphasising the accountability principle that emphasises responsibility and human oversight, stating that generative AI cannot take a role in the assessment or evaluation of scientific content in funding decisions.	This confirms the PA's commitment to ensuring human oversight remains paramount when deploying AI tools in governance and funding processes.
	Alignment with EU Legislative Frameworks: Strongly commits to implementing EU regulations that impact digitalisation, specifically the AI Act, Data Act, and Interoperable Europe Act.	This ensures the technical foundation of all government data and service systems, including those that interact with HEIs, is legally aligned with EU mandates.
	Sustainability in Infrastructure: Shares the sustainability focus found in other documents (E4, D21, D22, D20), committing to adopting green technology and energy-efficient solutions when modernising its data centre facilities.	This provides a baseline for environmentally responsible technical infrastructure, essential for supporting computationally intensive services like AI deployment.
Inconsistencies	Data Sharing Imperative vs. Data Protection Restriction: The strategy's goal is to implement a technical interoperability platform (service bus) to enable data exchange across public administration systems and support the sharing and re-use of data.	Tension: This aligns with the national data strategy (D20) but is at odds with the privacy instruction given to researchers (E4, D25) who must restrict sensitive data flow to external, potentially less secure, systems.
Doc ID:	D24: University of Malta Strategic Plan 2020-2025	
	Finding	Details Focused on AI/GenAI
Gaps:	Specific AI Policy: The document is completely silent on Artificial Intelligence , Generative AI, or computational thinking.	As it was drafted and published before the GenAI boom (2020), it contains a significant policy vacuum concerning the strategic direction, infrastructure needs, and ethical



		management of emerging technologies in teaching, research, and services.
	Digital Skills and Research Technology: Lacks a specific strategic direction for enhancing faculty or researcher digital skills in the use of advanced digital tools or emerging research technologies.	Strategic Theme 2 focuses on setting up a Research Integrity Office and streamlining UREC, which can respond to AI issues, but lacks the forward-looking strategy needed for technological capacity building (a major requirement identified in the ERA Guidelines).
Overlaps	Human Accountability and Integrity Structures: Commit to the values of good governance and accountability and mandate the establishment of a Research Integrity Office.	This structural commitment provides the formal mechanism (a body and governance principles) necessary to later enforce the specific AI guidelines issued in Document B and Document (E4).
	Commitment to Inclusion: Theme 3 focuses on Creating an Inclusive University for an Inclusive Society, including support for underrepresented students, diverse cultures, and students with disabilities.	This foundational commitment ensures that any subsequent policy developed for AI integration (as required by WP3) is rooted in the principles of equity and accessibility.
Inconsistencies	HEI Policy Gaps vs. K-12 Detail: The plan is silent on specific AI actions and technology-driven pedagogy, reflecting a significant strategic lag compared to the immediate, detailed, and time-bound AI implementation plans set out in the DDLTS Strategy (D21) for schools.	Contradiction: The institutional vision (D24) predates and therefore does not support the necessary technological transformation and digital capacity building required to manage the challenges already being proactively addressed at the compulsory education level (D21) and the operational level (D25).
Doc ID:	D25: Guidelines for Academic Staff on the use of Generative AI Tools in Class and in Assessments	
	Finding	Details Focused on AI/GenAI
Gaps:	Mandatory Training Standards for Faculty: Does not mandate or detail a standard, comprehensive, continuous professional development (CPD) programme or framework required for all academic staff regarding AI use, risks, or new assessment design.	The guidelines rely on academics becoming "familiar" with ethical issues and encourage CPD, but lack the robust, mandated training structure seen in the DDLTS Strategy (D21) for K-12 educators.
	Institutional Technical Controls for Data: Lacks any commitment to institutional provision of locally hosted or governed secure AI tools to mitigate privacy and data leakage risks.	The guidance relies entirely on the staff member's caution ("be especially careful not to include any sensitive information"), in contrast to the ERA's technical recommendation for HEIs to govern their own tools.
Overlaps	Data Privacy and Input Risk: Coheres with the ERA Guidelines (E4) in providing an explicit warning to staff about the risks inherent in using commercial GenAI tools, noting that input history could be used to train the system better and can also be read by company employees.	Both documents identify the risk to unpublished/sensitive data confidentiality when using proprietary external tools.
	Mandate for Transparency and Disclosure: Repeats the principle in the ERA Guidelines (A) that, if GenAI is substantially utilised in summative assessments, students should clearly acknowledge its use.	This demonstrates policy coherence in upholding academic honesty by requiring the disclosure of substantial AI contributions.
Inconsistencies	Policy on AI Plagiarism Detection (Direct Conflict): The UM Guidelines explicitly discourage the use of any AI writing-detection tools (beyond internal testing until December 2023) because they are unreliable, pose privacy risks, and cannot be used as proof in disciplinary procedures.	This stands in contrast to the industry trend of developing and deploying such tools (like the one introduced by Turnitin) and the implicit expectation in the ERA context that AI use, if detected, may negatively affect quality scoring.



	Governance Consistency: Policy application is delegated to the individual lecturer, in consultation with the Board of Examiners/Studies.	This decentralised approach risks creating inconsistency in policy application and assessment standards across various departments and faculties within the University, undermining uniform academic rigour.
Doc ID:	E4: Living guidelines on the responsible use of generative AI in research	
	Finding	Details Focused on AI/GenAI
Gaps:	Legal Liability for IP Infringement: Does not address the issue of legal liability for intellectual property (IP) infringement arising from GenAI outputs derived from copyrighted training data.	While the document stresses respecting IP rights, it focuses on the individual researcher's accountability for content integrity rather than on institutional or systemic legal liability for potential IP breaches arising from the models themselves.
	Detailed HEI Implementation Strategy: Provides a high-level framework for researchers and funding bodies but lacks detailed guidance for HEI administration on integrating these guidelines into operational policies, curriculum design, and assessment outside direct research activities.	Implementation relies on research organisations (HEIs) to proactively integrate these into their general research guidelines, suggesting a need for institutional policy development (a core task of WP3).
Overlaps	Human Accountability and Oversight: Aligns strongly with the MITA Strategy (D23) and the UM Strategic Plan (D24) in emphasising that human researchers remain ultimately responsible for scientific output; AI systems are neither authors nor co-authors.	This is a core consensus point across EU guidance and local institutional governance frameworks, establishing human oversight as a mandatory principle.
	Data Privacy and Input Risk: Coheres with the UM Guidelines (D25) in providing explicit warnings about data input. It advises researchers to protect unpublished or sensitive work by not uploading it to external AI systems unless they provide privacy assurances.	Both documents identify the risk that input data (prompts, text) could be used for training AI models or accessed by company employees.
	Mandate for Transparency and Disclosure: Repeats the principle found in the UM Guidelines (D25) that users must transparently detail which GenAI tools have been used substantially in their work.	This common requirement emphasises methodological transparency, asking for the tool's name, version, and date to ensure reproducibility and honest reporting.
Inconsistencies	Policy on AI Plagiarism Detection (Implied Tension): The ERA Guidelines suggest that disclosure of AI use <i>may lead to a lower quality score</i> during assessment.	This is in implicit tension with the UM Guidelines (D25) which explicitly prohibit the use of AI writing detection tools as proof for disciplinary procedures. The difference shows that while the ERA framework acknowledges potential negative evaluation consequences, UM actively blocks the use of technology to enforce such consequences due to reliability and privacy concerns.

The most significant inconsistency for WP3 is the Contradiction between the national imperative for data interoperability and flow (Documents **D20** and **D23**) and the academic mandate for data privacy and restriction (Documents **E4** and **D25**). While Malta Digitali (**D20**) and MITA (**D23**) push for shared data, single sign-on, and the Once-Only Principle (OOP) to modernise the Public Administration, the ERA (**E4**) and UM (**D25**) policies explicitly forbid researchers/staff from inputting sensitive data into proprietary external systems and recommend institutional control over tools. WP3 must resolve this conflict to provide lawful guidance on HEI-governed AI systems.



Section 5: Identified Risks

Risk ID	Description (of Risk)	Level (High/Medium/Low)	Potential Impact	Source Doc ID(s)	Mitigation or Policy Response
R.1	Data Leakage and Intellectual Property (IP) Theft in Research	High	Loss of research competitiveness, IP theft, and breach of GDPR due to researchers' inputting sensitive or unpublished data into proprietary external GenAI systems that may reuse the data for model training.	E4	Technical/Policy: Research organisations should, whenever possible, implement locally hosted or cloud-based GenAI tools that they govern themselves to ensure data protection. Researchers must be mindful and protect unpublished or sensitive work by taking care not to upload it.
R.2	AI Plagiarism and Academic Integrity Breach	High	Devaluation of qualifications, compromised academic rigour, and disciplinary failures due to students submitting unacknowledged, AI-generated content as their own work.	D25	Policy/Pedagogical: The unacknowledged use of work generated by AI tools is considered plagiarism. Enforcement relies on oral examination if a serious mismatch is confirmed, leading to a report to the University Assessment Disciplinary Board.
R.3	Conflict between National Data Sharing Mandates and Research Confidentiality	High	Legal exposure (GDPR, IP) and inability to conduct confidential research as the national push for Once-Only Principle (OOP) and data reuse (E, F) clashes with the academic mandate to strictly control sensitive data input into potentially non-secure external systems (A, B),...	D20, D23, E4	Legal/Technical: Adherence to EU data protection rules is mandatory. MITA commits to implementing measures for the Data Governance Act and Data Act. The ERA recommendation (R.1) to use locally governed tools is the primary technical mitigation, although it conflicts with the OOP principle of data exchange.
R.4	Risk from Unreliable AI Detection Software	Med	Unfair disciplinary actions, false accusations of plagiarism, and student data privacy concerns resulting from the unreliability and legal uncertainty of AI writing detection tools.	D25	Policy/Legal: The University discourages the use of any AI writing-detection tools for disciplinary proceedings, requiring reliance on human-led oral examination procedures.
R.5	AI-Generated Fabrication, Falsification, and Inaccuracies	Med	Erosion of research trust, dissemination of false information ("hallucinations," invented citations), and biased output (Training Data Bias, Prompt Bias).	E4	Ethical/Training: Researchers must remain ultimately responsible, maintain a critical approach to output, and disclose or discuss the limitations of the GenAI tools used. Research organisations must provide training on verifying output and addressing biases.
R.6	Absence of Coherent HEI AI Strategy	Med	Policy fragmentation and inadequate resource allocation resulting from the UM Strategic Plan (2020–2025) being completely silent on AI (gap), failing to provide strategic support for technological transformation.	D22, D24	Governance: The MFHEA Plan mandates the setting up of a National Coordination Mechanism on Emerging Opportunities (Pillar 2) to reduce policy silos. The UM must rely on separate guidelines (D25) and the eventual



					Research Integrity Office (D24) to manage ethics.
R.7	Performance Gaps in Computational Thinking (CT) and Digital Skills	Med	Future workforce deficiencies, widening of the digital divide, and limited capacity to innovate in AI/digital sectors, especially given Malta scored below the international mean in CT.	D21, D22	Pedagogical/Social: The DDLTS Strategy aims to strengthen computational thinking in curricula. MFHEA recommends dedicated support and incentives to achieve the target of 80% basic digital skills.
R.8	Risk of Unmanaged Ethical/Safety Issues in Digital Content Creation (K-12)	Med	Societal harm, ethical lapses, or noncompliance risks related to students consuming and creating digital content on social media platforms and via AI.	D21	Policy: The DDLTS Strategy mandates the development of a comprehensive digital safety and ethics policy for schools, accompanied by guidelines covering AI by September 2025.
R.9	Lack of Alignment/Compliance in Platform Integration	Med	GDPR breach, insecure student data, and system instability when implementing single sign-on systems and integrating new third-party software (potentially including GenAI learning platforms).	D21	Technical/Legal: Action 4.4.1 ensures that integration collaboration involves the MEYR legal team to ensure all integrations comply with privacy policies.
R.10	Insufficient Faculty/Staff AI Skills and Capacity	Med	Failure to effectively integrate GenAI pedagogically, leading to poor learning outcomes and an inability to manage ethical issues like bias, due to the lack of mandatory, standardised training across HEI staff.	E4, D25	Training: Research organisations must provide and/or facilitate training for all career levels on using GenAI responsibly, verifying output, and addressing biases. Academics are encouraged to participate in Continuous Professional Development (CPD).

Section 6: Additional Checks – Policy Implementation and Adoption

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 policies translate into national documents by setting mandatory objectives and informing core strategic alignment. The DDLTS Strategy explicitly aligns with the Digital Education Action Plan (DEAP) , aiming to meet its targets and foster a digital school culture in line with its direction. Nationally, the Malta Digital strategy and the MITA Strategy commit to implementing measures aligned with the AI Act and the Data Governance Act . Institutionally, the ERA Guidelines on AI in research mandate compliance with EU data protection rules (GDPR) and are built on the EU AI policy framework, translating principles like reliability and transparency into research standards.
Extent of Implementation	Was the implementation partial or full? Provide brief reasoning and examples.	Implementation is generally partial, often defined by the development of strategies, action plans, and new governance structures rather than completed outcomes. The MFHEA Strategic Plan outlines a commitment to implementation through the launch of multiple Working Groups (four in 2023) and a National Coordination Mechanism (2024) to guide future action, placing implementation in the structural development phase. The DDLTS Strategy provides 50 strategic





		actions, each pegged to a plan indicating who is responsible, and includes systematic monitoring and evaluation, showing a commitment to accountable tracking. However, institutional technical implementation, such as the use of AI writing detection tools at the University of Malta, was only partial and explicitly restricted, as these tools were used only for testing until December 2023 and cannot be used as proof for disciplinary procedures .
Institutional Adoption of AI Regulations	How has your institution implemented or enforced AI-related guidelines (e.g., academic policies, staff guidance, committees)?	The University of Malta (UM) adopted the <i>Guidelines for Academic Staff on the use of Generative AI Tools</i> to manage the integration of this technology into teaching and assessment. These guidelines enforce academic integrity by explicitly defining the unacknowledged use of AI-generated work as plagiarism and require lecturers to determine the permissible modality of use for their study units. Enforcement for suspected AI misuse relies on human judgment via oral examination procedures, with confirmed severe cases reported to the University Assessment Disciplinary Board . Staff also received guidance to avoid inputting sensitive information into GenAI tools due to associated privacy risks and data protection concerns.

Section 7: Partner Reflections

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

The Maltese policy landscape demonstrates a commendable proactive approach in reacting swiftly to the immediate challenges posed by Generative AI in the academic sphere, notably through the rapid deployment of the **UM Guidelines for Academic Staff (B25)** and the adherence to the **ERA Guidelines for Research (E4)**. A primary strength is the strong alignment with the EU's ethical and legal objectives, as national strategies (Malta Digitali and MITA) commit to implementing major regulatory acts, including the AI Act, the Data Governance Act, and GDPR, providing a robust legal foundation for responsible digital transformation and AI governance across the public sector. Furthermore, there is robust strategic commitment at the national level (MFHEA) to overcome fragmentation by establishing **National Coordination Mechanisms on Emerging Opportunities** (Pillar 2) to develop coherent policies for future digital technologies. This framework is further strengthened by the foundational commitment in the DDLTS Strategy to embed AI ethics and computational thinking from early education, ensuring that future university entrants have basic ethical and technical awareness.

However, the policy environment reveals significant weaknesses rooted in strategic and operational fragmentation. A major vulnerability stems from the **governance vacuum** at the institutional strategic level, exemplified by the *UM Strategic Plan 2020–2025 (D24)*. This document was developed via extensive consultations spanning 2018–2019 and published in 2020, prior to the "rapid and disruptive acceleration", driven by GenAI tools like ChatGPT (introduced November 2022). Given the Strategic Plan's nature as an extensive, periodic document covering all areas of university operations, its initial silence on AI is understandable. Yet, the rapid pace of technological development—which demands that guidelines must continuously adapt and evolve—highlights a lack of agility, as the institution relied instead on separate, reactive, operational *Guidelines for Academic Staff (B25)* published nearly four years later (November 2023). This failure to issue a formal strategic update to address the technology's disruptive nature represents a governance gap in high-level vision and resource direction. Critically, a high-level **inconsistency** exists between the national mandate for data flow and reuse—driving the **Once-Only Principle (OOP)** in the Public Administration (**D20, D23**)—and the absolute requirement in academic and research policy (**E4, D25**) to **restrict confidential data input** into external GenAI systems to protect IP and privacy. The University also faces a significant pedagogical and resource risk by explicitly **discouraging the use of AI-detection software** due to reliability and privacy concerns, thereby forcing the adoption of the resource-intensive **oral examination** as the primary method for enforcing academic accountability.

For inclusion in the consolidated policy analysis report, the WP3 leader should prioritise the following initial recommendations: First, the report must highlight the **fundamental conflict between the OOP/data sharing**





imperative (D20, D23) and the research integrity mandate for data restriction and institutional control (E4, D25), proposing mechanisms for HEIs to lawfully operate secure, confidential AI tools while navigating national interoperability mandates. Second, the analysis should contrast the detailed, time-bound AI policy actions found in the K-12 DDLTS Strategy (**D21**) with the aspirational or absent strategic commitments at the FHE/HEI level (**D22, D24**) to underscore the urgency of integrating **proactive AI preparedness** into forthcoming Higher Education strategic plans. Finally, the report should address the resource implications of relying solely on human assessment (oral examinations) for plagiarism enforcement and recommend that HEIs invest in **standardised, compulsory Continuous Professional Development (CPD)** for academic staff to build capacity for bias mitigation and ethically informed assessment design.

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).

