



Structured Document Review Report (Task 3.1 – Partner)

(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
University of Bergamo	Italy	Roberto Sala	09/12/2025

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 (Law/Strategy/Policy/Guideline)	Scope (National/Institutional)	Short Description
D13	Linee guida per l'utilizzo dell'Intelligenza Artificiale nella Didattica, nella Ricerca e nei Processi Amministrativi	UniBg	2025	Guideline	Institutional	Guidelines released by UniBg on the use of AI for all the stakeholders participating in the university life. The document describes the efforts done by the university to depict a fair and responsible use of AI at every level with practical examples for each stakeholder. Guidelines want to be dynamic (i.e., to be updated periodically considering the evolution of the technology)
D14	Codice di comportamento dei dipendenti dell'Università degli Studi di Bergamo	UniBg	2024	Policy	Institutional	Description of the behaviour of the employees of the university in terms of decisions, power, gifts, corruption, transparency, traceability. These apply to the working life (respect rules of the university) and to the private one (in terms of not exploiting information of privileges outside the working context)
D15	Carta dei diritti e dei doveri degli studenti e delle studentesse	UniBg	2015	Policy	Institutional	Due and duties of students in relation to the safe and transparent attending of lectures and exams.
D16/E6/D47	REGOLAMENTO (UE) 2016/679 DEL PARLAMENTO EUROPEO E DEL CONSIGLIO del 27 aprile 2016 relativo alla protezione delle persone fisiche con riguardo al trattamento dei dati personali, nonché alla libera circolazione di tali dati e che abroga la direttiva 95/46/CE	EU	2016	Law	European	European regulation on data protection. Text for GDPR
D17	Piano Strategico 2023/2027	UniBg	2023	Strategy	Institutional	UniBg strategy for the period 2023/2027. Definition of the strategies UniBg want to implement for its growth and to provide all the stakeholders with the required wellness in terms of work life balance and personal growth. The same goes for the students.
D18	CODICE ETICO DI ATENEO	UniBg	2018	Policy	Institutional	Describes the ethical behaviour of all the stakeholders of the university. Clarifies the no discrimination, sexual misconduct, or other bad





						behaviour should take place. Ensures the research and teaching freedom. Clarifies rules for intellectual property and conflict of interest. No power abuse should take place. Requires the respect of the university reputation, the privacy of data and the dues and duties of students.
D19	LINEE GUIDA PER LE MODALITÀ DI INTERAZIONE TRA DOCENTE E STUDENTI	UniBg	2021	Guidelines	Institutional	Describes how students and professors/researchers should interact, share information and data.
D46	Guidelines for Research Institutions For the Integrity and Security of Research	Italian Government (MUR)	2025	Guidelines	National	The aim is to provide universities and research institutions with operational guidance to strengthen research security.
D48	Disposizioni e deleghe al Governo in materia di intelligenza artificiale.	Italian Government	2025	Law	National	It provides indications regarding the research, experimentation, adoption and application of AI systems and models.
E3	Digital education action plan 2021-2027	EU	2020	Working document	European	It provides evidence and analysis of the opportunities and challenges that the digital transformation brings to education and training.

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:

Category	Key Extracts (Doc D13)	Observations (coverage, strengths, weaknesses)
Ethics & Integrity	Page 4: “Le presenti Linee guida [...] si pongono in continuità con il quadro normativo interno e sovraordinato che disciplina i diritti, i doveri e le responsabilità dei membri della comunità universitaria, con specifico riferimento al codice etico di Ateneo” (“These Guidelines [...] are consistent with the internal and overarching regulatory framework governing the rights, duties, and responsibilities of members of the university community, with specific reference to the University’s code of ethics.”) Page 5: “Uso etico: Impiego conforme ai valori di correttezza, equità, non discriminazione, integrità” (Page 5: “Ethical use: Use in accordance with the values of fairness, equity, non-discrimination, and integrity.”) Page 6: “Ogni contenuto prodotto mediante strumenti di IA deve essere rivisto, validato e contestualizzato [...]” (“Every content produced through AI tools must be reviewed, validated, and contextualized before dissemination.”) Page 9: “L’Università degli studi di Bergamo si impegna a promuovere un uso etico e responsabile dell’IA [...]” (“The University of Bergamo commits to promoting an ethical and responsible use of Artificial Intelligence [...]”) Page 10: “Gli esempi che seguono hanno lo scopo di supportare i docenti nell’utilizzo etico e consapevole degli strumenti di IA nella propria attività didattica, garantendo nel contempo che gli Studenti e le Studentesse siano valutati in merito alla loro personale preparazione e che, quindi, producano contenuti originali e non creati dall’IA.” (The following examples are intended to support teachers in the ethical and informed use of AI tools in their teaching activities, while ensuring that students are assessed on their personal preparation and, therefore, produce original content that is not created by AI.)	Emphasizes integrity, fairness, and ethical accountability in AI use across teaching, research, and administration, aligning with PATH-AI’s ethics goals.
Data Privacy & Security	Page 6: “È obbligatorio adottare misure rigorose per tutelare la protezione di dati personali [...]” (“It is mandatory to adopt strict measures to protect personal data [...]”)	The document establishes strong safeguards for data protection, privacy, and compliance with GDPR and the AI Act. It



	Page 19: "Si suggerisce di leggere sempre le policy sulla privacy del tool di IA prima di condividere testi." ("It is advised to always read the AI tool's privacy policy before sharing texts.") Page 23: "È fatto espresso divieto al personale di inserire in strumenti di Intelligenza Artificiale dati personali, inclusi quelli appartenenti a categorie particolari (art. 9 GDPR) o relativi a condanne penali e reati (art. 10 GDPR); dati relativi a imprese, enti, associazioni o altri soggetti giuridici, anche quando non contengano dati personali. Qualora risulti indispensabile trattare informazioni potenzialmente riconducibili a dati personali, inclusi quelli appartenenti a categorie particolari (art. 9 GDPR) o relativi a condanne penali e reati, è obbligatorio procedere alla loro anonimizzazione o pseudonimizzazione, nel rispetto dei principi del GDPR (liceità, minimizzazione, integrità)." ("Staff are expressly prohibited from entering personal data into Artificial Intelligence tools, including data belonging to special categories (Article 9 of the GDPR) or relating to criminal convictions and offenses (Article 10 of the GDPR); data relating to companies, entities, associations, or other legal entities, even when they do not contain personal data. If it is essential to process information that could potentially be traced back to personal data, including data belonging to special categories (Art. 9 GDPR) or relating to criminal convictions and offenses, it is mandatory to anonymize or pseudonymize such data in accordance with the principles of the GDPR (lawfulness, minimization, integrity).")	defines explicit prohibitions on handling personal or sensitive data via AI systems.
Equity & Inclusion	Page 6: "La comunità universitaria deve impegnarsi affinché l'IA non amplifichi eventuali bias o discriminazioni implicite. L'utilizzo dell'IA generativa deve avvenire in modo equo e inclusivo, rispettando e valorizzando le diversità linguistiche, culturali, etniche, di genere e relative alla disabilità." ("The university community must strive to ensure that AI does not amplify any implicit biases or discrimination. Generative AI must be used in a fair and inclusive manner, respecting and valuing linguistic, cultural, ethnic, gender, and disability diversity.") Page 8: "Gli algoritmi di IA possono riflettere pregiudizi preesistenti nei dati di addestramento, portando a decisioni discriminatorie, pecialmente nei processi selettivi (es. valutazioni, selezione di personale o Studenti);" ("AI algorithms can reflect pre-existing biases in training data, leading to discriminatory decisions, especially in selection processes (e.g., evaluations, selection of personnel or students).")	The document promotes inclusive and fair AI usage to avoid bias and discrimination. It directly connects with PATH-AI's commitment to equity and responsible AI adoption in education.
Transparency & Explainability	Page 6: "È fondamentale poter ricostruire come e in che misura l'IA sia stata utilizzata per contribuire a un lavoro, una pubblicazione o un prodotto formativo e, nei casi opportuni, farne menzione esplicita." ("It is essential to be able to reconstruct how and to what extent AI has been used to contribute to a work, publication, or educational product and, where appropriate, to make explicit mention of this.") Page 6: "Quattro sono i principi generali su cui si fondano le Linee guida di UniBg: Responsabilità, Trasparenza, Sicurezza e Inclusione. Tali principi sono declinati a seconda del campo di applicazione (Didattica, Ricerca o Processi Amministrativi) e del profilo dell'utente a cui si rivolgono (Docente e Ricercatore, Studente/Studentessa o personale Tecnico-Amministrativo, Bibliotecario e C.E.L.)." ("The UniBg Guidelines are based on four general principles: Responsibility, Transparency, Security, and Inclusion. These principles are applied according to the field of application (Teaching, Research, or Administrative Processes) and the profile of the user to whom they are addressed (Teachers and Researchers, Students, or Technical-Administrative Staff, Librarians, and C.E.L.)." Page 15: "Trasparenza: tenere traccia documentale delle diverse fasi in cui un contenuto è stato processato." ("Transparency: keep documentary records of the different stages in which content has been processed.")	Promotes documentation and openness in all AI uses. This reflects a strong institutional culture of transparency and aligns with PATH-AI's objective to ensure explainable AI in education governance.





	Page 24: "Il principio di trasparenza rappresenta un presupposto essenziale dell'azione amministrativa [...]" ("The principle of transparency represents an essential prerequisite of administrative action [...])")	
Governance Structures	Page 3: "L'Università degli studi di Bergamo ha attivato un Tavolo di lavoro interdipartimentale sull'Intelligenza Artificiale con l'obiettivo di costruire un dialogo interdisciplinare attraverso la condivisione di un'agenda di ricerca che è stata sintetizzata in un White Paper . Il Tavolo ha consentito, da un lato, di mappare le attività in essere presso l'ateneo, e dall'altro di riconoscere potenzialità e rischi connessi all'utilizzo degli strumenti che l'IA mette a disposizione." ("The University of Bergamo has set up an interdepartmental working group on Artificial Intelligence with the aim of building interdisciplinary dialogue through the sharing of a research agenda that has been summarized in a White Paper. The working group has made it possible, on the one hand, to map the activities currently underway at the university and, on the other, to recognize the potential and risks associated with the use of the tools that AI makes available.")	The creation of institutional working groups and inclusion of AI governance within university strategies reflect a structured governance model for AI adoption, resonating with PATH-AI's policy development aims.
Technical Standards & Interoperability	No explicit reference to technical standards, interoperability, or system integration requirements was found in the document.	The guidelines primarily address ethical, procedural, and governance aspects. They do not provide specific technical requirements or interoperability standards for AI systems.
Accountability & Liability	Page 6: "Chiunque utilizzi strumenti di IA è personalmente responsabile dell'uso corretto e appropriato che ne fa. L'utente deve sempre verificare criticamente l'accuratezza degli output generati, assumendosene piena responsabilità. Ogni contenuto prodotto mediante strumenti di IA deve essere rivisto, validato e contestualizzato prima della sua diffusione." ("Anyone who uses AI tools is personally responsible for their correct and appropriate use. Users must always critically verify the accuracy of the outputs generated, assuming full responsibility for them. All content produced using AI tools must be reviewed, validated, and contextualized before dissemination.") Page 10: "Gli strumenti di IA possono essere utilizzati a supporto della didattica, per la preparazione e l'erogazione di contenuti didattici e per la generazione di esami. Ogni Docente è responsabile dell'uso che intende farne e deve essere consapevole dei rischi a cui può andare incontro nel suo utilizzo. Nel contempo, se decide di farne uso, è bene che dichiararli, all'interno del Syllabus del corso, cosa è consentito e cosa no, e con quali strumenti." ("AI tools can be used to support teaching, to prepare and deliver educational content, and to generate exams. Each teacher is responsible for how they intend to use them and must be aware of the risks involved in their use. At the same time, if they decide to use them, it is a good idea to state in the course syllabus what is and is not permitted, and with which tools.") Page 13: "In accordo con i principi generali di Responsabilità, Trasparenza, Sicurezza e Inclusione, partendo dall'assunto che gli studenti devono produrre contenuti fatti da loro e che i docenti hanno la responsabilità di verifica, queste Linee guida affrontano i temi della responsabilità nell'utilizzo[...]" ("In accordance with the general principles of Responsibility, Transparency, Security, and Inclusion, and based on the assumption that students must produce content themselves and that teachers are responsible for verifying it, these Guidelines address the issues of responsibility in the use of [...]") Page 14: "Ogni Studente e Studentessa ha la piena responsabilità di ciò che produce e dell'uso che fa dell'IA e deve essere consapevole dei rischi a cui può andare incontro nel suo utilizzo." ("Each student is fully responsible for what they produce and how they use AI, and must be aware of the risks they may encounter when using it.")	Clearly defines personal and institutional accountability for AI use. Promotes human oversight and responsibility aligned with PATH-AI governance focus.





	Page 18: "G li strumenti di IA possono essere utilizzati a supporto di varie fasi del processo di ricerca: nello sviluppo di idee, nella conduzione di analisi della letteratura, nell'analisi dei dati, nella generazione e revisione di testi, nella produzione di codice. Tuttavia, la responsabilità del contenuto degli output di ricerca, la relativa accuratezza e il rispetto di standard etici e di integrità ricadono interamente sui ricercatori che firmano il lavoro." ("AI tools can be used to support various stages of the research process: in developing ideas, conducting literature reviews, analyzing data, generating and reviewing texts, and producing code. However, responsibility for the content of research outputs, their accuracy, and compliance with ethical and integrity standards rests entirely with the researchers who sign off on the work.")	
Sustainability	Page 8: "L'utilizzo dell'IA richiede rilevanti consumi energetici con un conseguente impatto ambientale che va tenuto in considerazione." ("The use of AI requires significant energy consumption with a consequent environmental impact that must be taken into account.")	Acknowledges the environmental impact of AI and links sustainability to responsible digital transformation. Connects with PATH-AI's principle of sustainable innovation in education.

Replicate table for each document

Category	Key Extracts (Doc D14)	Observations (coverage, strengths, weaknesses)
Ethics & Integrity	Page 4: "Il dipendente osserva la Costituzione, servendo la Nazione con disciplina ed onore, conformando la propria condotta ai principi di buon andamento e imparzialità dell'azione amministrativa e svolge i propri compiti nel rispetto della legge, perseguendo l'interesse pubblico senza abusare della posizione o dei poteri di cui è titolare." ("Employees shall observe the Constitution, serving the nation with discipline and honor, conforming their conduct to the principles of good governance and impartiality in administrative action, and shall perform their duties in accordance with the law, pursuing the public interest without abusing their position or powers.") Page 4: "Il dipendente rispetta altresì i principi di integrità, correttezza, buona fede, proporzionalità, obiettività, trasparenza, equità, ragionevolezza e agisce in posizione di indipendenza e imparzialità, astenendosi in caso di conflitto di interessi" ("Employees shall also respect the principles of integrity, fairness, good faith, proportionality, objectivity, transparency, equity, and reasonableness, and shall act independently and impartially, abstaining in the event of a conflict of interest.") Page 8: "L'utilizzo di account istituzionali è consentito per i soli fini connessi all'attività lavorativa o ad essa riconducibili e non può in alcun modo compromettere la sicurezza o la reputazione dell'Ateneo." ("The use of institutional accounts is permitted solely for purposes related to work activities or activities attributable thereto and may not in any way compromise the security or reputation of the University.")	Sets a strong ethical baseline (integrity, impartiality, fairness) for all staff even though not related with AI; aligns with PATH-AI's ethics dimension.
Data Privacy & Security	Page 7: "L'assolvimento degli obblighi di pubblicazione avviene nel rispetto della normativa in materia di protezione dei dati personali, prestando particolare attenzione affinché i dati personali oggetto di pubblicazione siano adeguati, pertinenti e limitati in relazione alle finalità per cui sono trattati." ("The fulfillment of publication obligations is carried out in compliance with personal data protection regulations, paying particular attention to ensuring that the personal data published is adequate, relevant, and limited in relation to the purposes for which it is processed.") Page 8-9: "L'Ateneo, attraverso i propri responsabili di struttura, ha facoltà di svolgere gli accertamenti necessari e adottare ogni misura atta a garantire la sicurezza e la protezione dei sistemi informatici, delle informazioni e dei dati. Le modalità di svolgimento di tali accertamenti sono stabilite mediante linee guida adottate dall'Agenzia per l'Italia Digitale, sentito il Garante per la protezione dei dati personali. In caso di	Explicit GDPR-aware handling of data, credential hygiene, and IT-security controls; relevant to responsible AI operations.





	uso di dispositivi elettronici personali, trova applicazione l'articolo 12, comma 3-bis del decreto legislativo 7 marzo 2005, n. 82" ("The University, through its department heads, has the authority to carry out the necessary checks and take all measures necessary to ensure the security and protection of IT systems, information, and data. The procedures for carrying out such investigations are established by guidelines adopted by the Agency for Digital Italy, after consultation with the Italian Data Protection Authority. In the case of the use of personal electronic devices, Article 12, paragraph 3-bis of Legislative Decree No. 82 of March 7, 2005, applies.")	
Equity & Inclusion	Page 5: "Il dipendente assicura [...] che non vi siano discriminazioni basate su sesso, nazionalità, origine etnica, [...] disabilità, condizioni sociali o di salute, età e orientamento sessuale." ("The employee ensures [...] that there is no discrimination based on sex, nationality, ethnic origin, [...] disability, social or health conditions, age and sexual orientation.") Page 10: "Adottano un comportamento esemplare in termini di [...] parità di trattamento, equità, inclusione e ragionevolezza nei rapporti con i colleghi [...]" ("They adopt exemplary conduct in terms of [...] equal treatment, equity, inclusion and reasonableness in relations with colleagues [...]" Page 10: "Favorendo [...] l'inclusione e la valorizzazione delle differenze di genere, di età e di condizioni personali." ("Promoting [...] inclusion and the enhancement of differences in gender, age and personal conditions.")	Codifies non-discrimination and proactive inclusion; supports equitable adoption of digital/AI-enabled processes.
Transparency & Explainability	Page 7: "Il dipendente imposta la propria attività secondo principi di trasparenza e assicura la massima tracciabilità nei processi decisionali, sia ai fini dell'adempimento degli obblighi normativi, sia ai fini di garantire la soddisfazione degli utenti finali. Il dipendente viene informato, ed è tenuto al rispetto, della normativa in materia di pubblicità, trasparenza e diffusione di informazioni da parte delle pubbliche amministrazioni, e degli obblighi di pubblicazione previsti dalla sezione "Rischi corruttivi e trasparenza" del Piano integrato di attività e organizzazione (PIAO) dell'Ateneo e relativi allegati." ("Employees shall conduct their activities in accordance with principles of transparency and ensure maximum traceability in decision-making processes, both for the purposes of complying with regulatory obligations and to guarantee end-user satisfaction. Employees are informed of and are required to comply with regulations on advertising, transparency, and the dissemination of information by public administrations, as well as the publication requirements set out in the section "Corruption risks and transparency" of the University's Integrated Activity and Organization Plan (PIAO) and related annexes." Page 7: "Assicurando la qualità, l'integrità, il costante aggiornamento, la completezza, l'omogeneità, nonché la facile accessibilità delle informazioni." ("Ensuring the quality, integrity, constant updating, completeness, uniformity and easy accessibility of information.")	Strong transparency and traceability requirements; applicable to documenting AI-supported processes and decisions.
Governance Structures	Page 1: "L'aggiornamento del codice è stato curato dall'UPD [...] in collaborazione con il Responsabile della prevenzione della corruzione e della trasparenza (RPCT) [...]" ("The update of the code was handled by the Disciplinary Proceedings Office (UPD) in collaboration with the Head of Prevention of Corruption and Transparency (RPCT) [...]" Page 10: "Osservano e vigilano sul rispetto delle regole disciplinari, di trasparenza e anticorruzione [...] da parte dei dipendenti della struttura di cui sono responsabili." ("They observe and ensure compliance with disciplinary, transparency and anti-corruption rules [...] by the employees of the structure for which they are responsible.") Page 11-12: "Il Responsabile della prevenzione della corruzione e della	Clear allocation of roles (UPD, RPCT, Directors/Managers) and monitoring; forms an institutional governance backbone.





	trasparenza cura [...] il monitoraggio annuale sulla loro attuazione [...] e la comunicazione all'ANAC dei risultati.” (“The Head of Prevention of Corruption and Transparency oversees [...] annual monitoring of implementation [...] and notification of results to ANAC.”)	
Technical Standards & Interoperability	Page 8–9: “Le modalità di svolgimento di tali accertamenti sono stabilite mediante linee guida adottate dall'Agenzia per l'Italia Digitale, sentito il Garante per la protezione dei dati personali.” (“The procedures for such checks are established by guidelines adopted by the Agency for Digital Italy, after consulting the Data Protection Authority.”) Page 7: “Utilizza, ove previsto, gli strumenti informatici di Ateneo, seguendo le modalità di archiviazione previste dalle procedure interne.” (“Uses, where provided, the University's IT tools, following the filing methods set by internal procedures.”)	References to AGID/Garante guidelines and internal IT procedures indicate baseline technical and procedural standards; no explicit interoperability frameworks.
Accountability & Liability	Page 12: “La violazione degli obblighi [...] dà luogo a responsabilità disciplinare [...] secondo quanto previsto dal Dlgs. 165/2001 e dai Contratti collettivi nazionali di lavoro.” (“The violation of the obligations [...] gives rise to disciplinary responsibility [...] as provided for by Legislative Decree 165/2001 and national collective agreements.”) Page 6–7: “Il dipendente comunica [...] quando ritiene sussistere un conflitto, anche potenziale [...] e si astiene dal prendere decisioni.” (“The employee notifies [...] when they believe there is a conflict, even potential [...] and refrains from making decisions.”) Page 6–7: “Pantouflage e incompatibilità successive [...] non può svolgere, nei tre anni successivi [...] attività lavorativa presso i soggetti privati destinatari dell'attività dell'Ateneo.” (“Revolving-door restrictions [...] may not perform, within three years [...] work for private entities that were recipients of the University's activities.”)	Defines sanctions, conflict-of-interest duties, and post-employment bans, strengthening individual and institutional accountability.
Sustainability	No explicit reference found to environmental, social, or economic sustainability considerations.	The code focuses on ethics, transparency, anti-corruption, and conduct; it does not address environmental/energy impacts relevant to digital/AI systems.

Replicate table for each document

Category	Key Extracts (Doc D15)	Observations (coverage, strengths, weaknesses)
Ethics & Integrity	Page 2: “La presente Carta si ispira pienamente ai principi supremi dell'ordinamento dello Stato nonché ai principi fondamentali e a tutte le norme della Costituzione, ponendosi la finalità di garantirne l'effettiva tutela.” (“This Charter fully adheres to the supreme principles of the State and the Constitution, aiming to ensure their effective protection.”) Page 3: “Gli Studenti hanno il dovere di rispettare gli ambienti, le strutture e le attrezzature dell'Ateneo, mantenendone funzionalità e decoro, condividendo regole di civile convivenza e di rispetto reciproco.” (“Students must respect the University's spaces, facilities, and equipment, maintaining functionality and decorum, and sharing rules of civil coexistence and mutual respect.”) Page 3: “Gli Studenti hanno il dovere etico e giuridico di astenersi dal porre in essere qualsiasi attività di plagio.” (“Students have the ethical and legal duty to refrain from any act of plagiarism.”)	Establishes moral and behavioral norms promoting honesty, respect, and integrity—relevant to AI ethics and academic integrity.
Data Privacy & Security	Page 4: “Lo Studente è tenuto [...] a mantenere la necessaria segretezza per quanto attiene a dati e informazioni acquisiti durante lo svolgimento del tirocinio.” (“The student is required [...] to maintain necessary confidentiality regarding	Mentions confidentiality and secure communication, linking indirectly to responsible data management in learning and research contexts.





	data and information acquired during the internship.”) Page 4: “Ogni variazione deve essere comunicata tempestivamente agli Studenti attraverso i canali istituzionali.” (“Every change must be promptly communicated to students through institutional channels.”)	
Equity & Inclusion	Page 2: “Essa si costituisce al di sopra dei confini delle nazioni, delle confessioni religiose e di ogni forma di discriminazione di censo, di genere o altro.” (“It stands above national, religious, or any other form of social, gender, or other discrimination.”) Page 2: “L’Università s’impegna a rimuovere ogni forma di discriminazione e a informare l’intera comunità accademica ai valori della tolleranza e della cooperazione, in un’ottica di valorizzazione delle diversità e secondo una prospettiva di inclusione.” (“The University is committed to eliminating all forms of discrimination and to educating the entire academic community about the values of tolerance and cooperation, with a view to promoting diversity and inclusion.”) Page 3: “Gli Studenti diversamente abili [...] hanno il diritto di usufruire di sussidi tecnici e didattici specifici nonché di benefici da servizi di tutorato specializzato.” (“Students with disabilities [...] have the right to specific technical and educational aids and specialized tutoring services.”)	Prioritizes equity, inclusion, and accessibility; consistent with PATH-AI goals for equitable AI-supported learning.
Transparency & Explainability	Page 3: “Gli Studenti hanno diritto ad una valutazione imparziale, attraverso prove d’esame trasparenti e coerenti con il programma.” (“Students have the right to impartial evaluation through transparent exams consistent with the program.”) Page 4: “Al fine di garantire la più ampia trasparenza e diffusione delle informazioni [...] l’Università garantisce la predisposizione in tempi adeguati di calendario didattico, programmi e referenti.” (“To ensure maximum transparency and dissemination of information [...] the University guarantees timely publication of academic calendars, programs, and contacts.”)	Ensures transparency in learning processes and communication; relevant for explainable evaluation and procedural fairness.
Governance Structures	Page 4: “La Commissione paritetica docenti-studenti di ogni Dipartimento garantisce il rispetto e l’attuazione dei principi enunciati dalla presente Carta.” (“The joint faculty-student commission in each department ensures compliance with and implementation of the principles set out in this Charter.”)	Provides governance structure for monitoring student rights, ensuring compliance and institutional accountability.
Technical Standards & Interoperability	No explicit reference to technical standards, digital systems, or interoperability.	Focuses on educational and behavioral rights; lacks technical or digital provisions.
Accountability & Liability	Page 4: “In caso di mancato rispetto della presente Carta [...] lo Studente può rivolgersi al tutor accademico.” (“In case of non-compliance with this Charter [...] the student may contact the academic tutor.”)	Establishes escalation mechanisms for violations; ensures accountability through faculty-student oversight structures.
Sustainability	No explicit reference to environmental or economic sustainability.	Document predates institutional emphasis on sustainability; not aligned with PATH-AI’s sustainability axis.

Replicate table for each document

Category	Key Extracts (Doc D16/E6/D47)	Observations (coverage, strengths, weaknesses)
Ethics & Integrity	Page 8 (Recital 1): “La protezione delle persone fisiche con riguardo al trattamento dei dati di carattere personale è un diritto fondamentale.” (“The protection of natural persons with regard to the processing of personal data is a fundamental right.”)	Establishes data protection as an ethical cornerstone rooted in human dignity, fairness, and responsibility—directly linked to AI ethics.



	Page 9 (Recital 4): “Il trattamento dei dati personali dovrebbe essere al servizio dell'uomo.”(“The processing of personal data should serve humankind.”) Page 37 (Recital 78): “La tutela dei diritti e delle libertà delle persone fisiche [...] richiede l'adozione di misure tecniche e organizzative adeguate.”(“The protection of the rights and freedoms of natural persons requires the adoption of appropriate technical and organizational measures.”)	
Data Privacy & Security	Page 113 (Art. 32): “Il titolare del trattamento e il responsabile del trattamento mettono in atto misure tecniche e organizzative adeguate per garantire un livello di sicurezza adeguato al rischio.”(“The controller and processor shall implement appropriate technical and organizational measures to ensure a level of security appropriate to the risk.”) Page 114 (Art. 33): “Il titolare del trattamento notifica la violazione dei dati personali all'autorità di controllo competente entro 72 ore.”(“The controller shall notify the personal data breach to the competent supervisory authority within 72 hours.”) Page 35 (Recital 83): “Il titolare del trattamento dovrebbe attuare misure per limitare tali rischi, quali la cifratura.”(“The controller should implement measures to limit such risks, such as encryption.”)	Defines the principles of privacy, security, encryption, and breach management foundational for any AI system using personal data.
Equity & Inclusion	Page 35 (Recital 71): “Impedisca tra l'altro effetti discriminatori [...] sulla base della razza, origine etnica, opinioni politiche, religione o orientamento sessuale.”(“Prevents discriminatory effects [...] on the basis of race, ethnic origin, political opinions, religion or sexual orientation.”) Page 20 (Recital 38): “I minori meritano una specifica protezione [...] relativamente ai loro dati personali.”(“Children merit specific protection with regard to their personal data.”)	Ensures equality, fairness, and non-discrimination in data use and automated processing, crucial for fair AI design.
Transparency & Explainability	Page 21 (Recital 39): “Il principio della trasparenza impone che le informazioni [...] siano facilmente accessibili e comprensibili.”(“The principle of transparency requires that information [...] be easily accessible and understandable.”) Page 90 (Art. 12): “Il titolare del trattamento adotta misure adeguate per fornire all'interessato tutte le informazioni [...] in forma concisa, trasparente, intelligibile e facilmente accessibile.”(“The controller shall take appropriate measures to provide information to the data subject in a concise, transparent, intelligible and easily accessible form.”)	Mandates transparency and explainability in data processing, including automated decision-making and profiling.
Governance Structures	Page 141 (Art. 51): “Ciascuno Stato membro istituisce una o più autorità pubbliche indipendenti incaricate di sorvegliare l'applicazione del presente regolamento.”(“Each Member State shall provide for one or more independent public authorities responsible for monitoring the application of this Regulation.”) Page 162 (Art. 68): “È istituito un comitato europeo per la protezione dei dati.”(“A European Data Protection Board is hereby established.”)	Establishes EU-level and national data protection authorities, ensuring cross-border coordination and regulatory coherence.
Technical Standards & Interoperability	Page 105 (Art. 25): “Protezione dei dati fin dalla progettazione e per impostazione predefinita.”(“Data protection by design and by default.”) Page 37 (Recital 78): “I produttori [...] dovrebbero tenere conto del diritto alla protezione dei dati allorché sviluppano e progettano prodotti, servizi e applicazioni.”(“Manufacturers should take account of the right to data protection when developing and designing products, services, and applications.”)	Introduces privacy-by-design and default principles; establishes interoperability between data protection and technology development.
Accountability & Liability	Page 171 (Art. 82): “Il titolare del trattamento o il responsabile del trattamento risarcisce il danno cagionato a una persona da un trattamento non conforme.”(“The controller or processor shall compensate for the damage caused by processing not in compliance with this Regulation.”) Page 172 (Art. 83): “Le autorità di controllo possono infliggere sanzioni amministrative pecuniarie.”(“Supervisory authorities may impose administrative fines.”)	Defines liability, sanctions, and redress mechanisms—ensuring enforceability and individual protection.
Sustainability	Page 7 (Recital 7): “È opportuno creare il clima di fiducia che consentirà lo sviluppo dell'economia digitale.”(“A climate of trust should be created to enable the development of the digital economy.”)	Promotes sustainable, trust-based digital ecosystems and research frameworks safeguarding privacy and innovation.



	Page 178 (Art. 89): “Garanzie e deroghe relative al trattamento a fini di archiviazione nel pubblico interesse, di ricerca scientifica o storica o a fini statistici.”(“Safeguards and derogations for processing for archiving purposes in the public interest, scientific or historical research, or statistical purposes.”)	
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Replicate table for each document

Category	Key Extracts (Doc D17)	Observations (coverage, strengths, weaknesses)
Ethics & Integrity	Page 5: “L’Università degli studi di Bergamo è un Ateneo aperto, plurale e con un forte impegno pubblico di responsabilità attiva verso la cittadinanza.”(“The University of Bergamo is an open, plural university with a strong public commitment to active responsibility toward citizenship.”) Page 9: “Ci impegniamo a preservare la natura pubblica del nostro Ateneo, sostenendo l’idea di un futuro fondato sulla tutela dei diritti fondamentali.”(“We commit to preserving the public nature of our University, supporting the idea of a future based on the protection of fundamental rights.”)	Embeds ethical and civic principles — integrity, responsibility, and protection of fundamental rights — as strategic values of the institution.
Data Privacy & Security	Page 90: “Aggiornare la dotazione tecnologica degli spazi e del personale con particolare attenzione all’accessibilità.”(“Update technological equipment and personnel tools with particular attention to accessibility.”) Page 91: “Rafforzare i sistemi di cyber security.”(“Strengthen cybersecurity systems.”)	Addresses digital infrastructure, cybersecurity, and data protection — relevant to AI system governance and digital trust.
Equity & Inclusion	Page 79: “Attivare iniziative volte a favorire il ‘wellness at work’ per tutto il personale UniBg.”(“Activate initiatives to promote workplace wellness for all UniBg staff.”) Page 81: “Organizzare eventi ed iniziative per migliorare la consapevolezza sui temi della parità di genere e del contrasto alla violenza di genere.”(“Organize events and initiatives to raise awareness on gender equality and combating gender-based violence.”)	Explicit focus on inclusion, gender equality, well-being, and accessibility; aligns directly with PATH-AI’s ethical and social responsibility principles.
Transparency & Explainability	Page 26: “Indicatori di riferimento per monitorare l’implementazione del Piano Strategico nei prossimi anni.”(“Reference indicators to monitor the implementation of the Strategic Plan over the coming years.”) Page 73: “Sviluppare procedure di monitoraggio interno ed esterno [...] nel rispetto dei principi di trasparenza ed anticorruzione.”(“Develop internal and external monitoring procedures [...] in accordance with principles of transparency and anti-corruption.”)	Promotes institutional transparency, monitoring, and accountability through measurable indicators and anti-corruption principles.
Governance Structures	Page 27: “L’attività di monitoraggio periodico [...] consente di individuare eventuali scostamenti tra i risultati attesi e quelli effettivamente conseguiti.”(“Periodic monitoring activities make it possible to identify discrepancies between expected and achieved results.”) Page 27: “La Cabina di Regia monitorerà costantemente il Piano Strategico e presiederà l’implementazione delle azioni.”(“The Steering Committee will constantly monitor the Strategic Plan and oversee the implementation of actions.”)	Defines governance mechanisms (Steering Committee, monitoring system) to ensure implementation and accountability.
Technical Standards & Interoperability	Page 90: “Potenziare le infrastrutture di rete di Ateneo.”(“Enhance the University’s network infrastructures.”) Page 91: “Aggiornare la dotazione tecnologica degli spazi e del personale [...] Adeguare l’ecosistema web per migliorarne la fruizione.”(“Update technological tools and adapt the web ecosystem to improve usability.”)	Reflects commitment to modern, interoperable digital environments and infrastructure upgrades, enabling AI-related projects.
Accountability & Liability	Page 27: “L’attività di monitoraggio [...] consente di individuare azioni correttive e aggiornamento delle politiche di Ateneo.”(“Monitoring activities allow identification of corrective actions and updating of University policies.”) Page 73: “Integrare il ciclo di bilancio, la pianificazione strategica e l’analisi dei fabbisogni.”(“Integrate the budgeting cycle, strategic planning, and needs analysis.”)	Ensures accountability through continuous evaluation, correction mechanisms, and integration between planning and budgetary control.





Sustainability	Page 23: “Concepiamo lo sviluppo sostenibile come fondamento strutturale e trasversale alle linee strategiche di Ateneo.”(“We conceive sustainable development as a structural and cross-cutting foundation of the University's strategic lines.”) Page 79: “Incentivare il confronto e l'adozione di buone pratiche sui temi dello sviluppo sostenibile.”(“Encourage the exchange and adoption of best practices on sustainable development.”)	Sustainability is a structural, transversal goal — integrating environmental, social, and governance aspects in strategy and operations.
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Category	Key Extracts (Doc D18)	Observations (coverage, strengths, weaknesses)
Ethics & Integrity	Page 2: “L'Università degli Studi di Bergamo [...] richiede a tutti i componenti della comunità universitaria [...] di rispettare, tutelare e promuovere [...] la dignità umana, [...] l'onestà, l'integrità e la professionalità.”(“The University of Bergamo requires all members of the academic community to respect, safeguard, and promote human dignity, honesty, integrity, and professionalism.”) Page 4: “Nell'esercizio della propria libertà di ricerca docenti e ricercatori sono tenuti a comportarsi in modo trasparente e responsabile.”(“In exercising their freedom of research, faculty and researchers must act transparently and responsibly.”)	Sets a comprehensive ethical framework for conduct, integrity, and responsibility in teaching and research. Central to PATH-AI's ethics component.
Data Privacy & Security	Page 6: “Tutti i componenti dell'Università [...] non rivelare dati, informazioni o documenti [...] facendone un uso conforme alle norme in materia di [...] tutela della riservatezza.”(“All University members [...] must not disclose data, information or documents [...] and must use them in accordance with confidentiality and privacy regulations.”) Page 8: “La/il Consigliera/e di fiducia [...] garantendo l'anonimato [...] assicurare il diritto alla riservatezza dei soggetti coinvolti.”(“The counsellor ensures anonymity [...] and must safeguard the privacy rights of the persons involved.”)	Protects personal and institutional data; integrates confidentiality and privacy within ethical behavior, relevant to AI and data governance.
Equity & Inclusion	Page 3: “Tutti i componenti dell'Università hanno diritto ad essere trattati con eguale rispetto [...] e a non essere discriminati in ragione di [...] religione, genere, orientamento sessuale, convinzioni personali, [...] condizioni di salute, [...] età.”(“All members of the University have the right to be treated with equal respect [...] and not to be discriminated against on grounds of religion, gender, sexual orientation, personal beliefs, health conditions, age.”) Page 3: “L'Università adotta [...] ogni iniziativa [...] atta a evitare qualsivoglia tipo di comportamento discriminatorio.”(“The University adopts every initiative [...] to prevent any kind of discriminatory behavior.”)	Strong institutional commitment to equity, diversity, and inclusion. Directly supports PATH-AI's social fairness goals in education and technology.
Transparency & Explainability	Page 4: “L'Università favorisce l'adozione [...] di sistemi di autoregolamentazione finalizzati ad illustrare [...] la metodologia, i risultati raggiunti e l'impatto [...] delle ricerche effettuate.”(“The University encourages self-regulation systems aimed at explaining [...] methodology, achieved results and ethical/social impact of the research.”) Page 7: “I componenti dell'Università sono sempre tenuti a fornire adeguata ed obiettiva motivazione delle decisioni rilevanti.”(“University members must always provide adequate and objective justification for relevant decisions.”)	Promotes transparency, explainability, and traceability of research, teaching, and decision-making — essential for responsible AI governance.
Governance Structures	Page 7: “Le violazioni del Codice devono essere segnalate al Rettore [...] e possono costituire motivo di sanzioni disciplinari.”(“Violations of the Code must be reported to the Rector [...] and may result in disciplinary sanctions.”) Page 8: “La/il Consigliera/e di fiducia [...] è nominata/o dal Rettore [...] su proposta del Comitato Unico di Garanzia per le Pari Opportunità.”(“The Counsellor is appointed by the Rector [...] upon proposal of the Equal Opportunities Committee.”) Page 8: “La/il Consigliera/e di fiducia [...] svolge attività di rilevazione dei problemi [...] garantendo l'anonimato.”(“The counsellor monitors potential risks [...] ensuring anonymity.”)	Establishes ethical governance through structured oversight, reporting, and dedicated roles (Rector, Equal Opportunities Committee, Counsellor).



Technical Standards & Interoperability	No explicit references to technical standards or interoperability are present in the document.	Ethical and procedural document; focuses on human behavior and organizational integrity rather than technical systems.
Accountability & Liability	Page 7: “Le sanzioni per le violazioni [...] da applicarsi secondo i criteri di gradualità e proporzionalità.” (“Sanctions for violations [...] shall be applied according to criteria of proportionality and gradualness.”) Page 7: “Sulle violazioni del Codice Etico [...] decide, su proposta del Rettore, il Senato Accademico.” (“In cases of violations [...] the Academic Senate decides, upon proposal of the Rector.”) Page 8: “La/il Consigliera/e di fiducia [...] svolge attività di rilevazione dei problemi [...] garantendo l'anonimato.” (“The counsellor monitors potential risks [...] ensuring anonymity.”)	Defines accountability mechanisms and disciplinary processes to enforce ethical compliance; relevant to AI ethics governance.
Sustainability	Page 2: “L'Università [...] si impegna nella creazione di una comunità [...] aperta alle relazioni [...] con la comunità scientifica nazionale e internazionale.” (“The University commits to creating a community [...] open to relations with the national and international scientific community.”)	Promotes social and institutional sustainability by fostering ethical collaboration, dialogue, and protection from discrimination or harm.

Replicate table for each document

Category	Key Extracts (Doc D19)	Observations (coverage, strengths, weaknesses)
Ethics & Integrity	Page 3: “Queste Linee guida definiscono ed indicano quali sono gli ambienti e gli strumenti a disposizione dei Docenti per poter interagire e comunicare con gli Studenti.” (“These Guidelines define and indicate the environments and tools available to instructors to interact and communicate with students.”) Page 3: “Le due tipologie di informazioni non vanno tra di loro confuse e vanno gestite nei due differenti ambienti in modo da rendere più facilmente rintracciabili agli studenti le informazioni di cui necessitano.” (“The two types of information must not be mixed and must be managed in two different environments so that students can more easily find the information they need.”) Page 3: “Uniformare le modalità attraverso le quali i titolari di insegnamento comunicano agli studenti tutte le informazioni rilevanti.” (“Standardize the ways in which course holders communicate all relevant information to students.”)	Promotes responsible, orderly communication and clarity of roles and tools—supporting integrity and fairness in teaching interactions.
Data Privacy & Security	Page 4: “Microsoft Teams è integrato con la soluzione Sharepoint per la condivisione di materiale didattico.” (“Microsoft Teams is integrated with the SharePoint solution for sharing teaching materials.”) Page 4: “Google Drive consente infatti di creare e condividere cartelle anche attraverso autorizzazioni (da configurare preliminarmente o da concedere su richiesta).” (“Google Drive makes it possible to create and share folders also through permissions [preconfigured or granted on request].”) Page 5: “[...] coerentemente al regolamento GDPR, [...] la richiesta deve essere accompagnata da una motivazione sostanziale [...]” (“[...] in accordance with the GDPR, [...] the request must be accompanied by a substantive justification [...]”)	Permission-controlled sharing and GDPR-aware communications support secure handling of student data and materials.
Equity & Inclusion	Page 3: “[...] gestite nei due differenti ambienti in modo da rendere più facilmente rintracciabili agli studenti le informazioni di cui necessitano.” (“[...] managed in two different environments so that students can more easily find the information they need.”) Page 4: “Si raccomanda l'uso della sezione Avvisi solo per comunicazioni di carattere sintetico e temporaneo, a beneficio di una complessiva leggibilità da parte dello studente.” (“Use of the Notices section is recommended only for concise and temporary communications, for overall readability for the student.”)	Improves equitable access to information by clarity, findability, and readable communication; implicit inclusion benefits.
Transparency & Explainability	Page 3: “Il Syllabus [...] si configura come un ‘contratto’ tra Docente titolare e studenti.” (“The Syllabus [...] constitutes a ‘contract’ between the course holder and the students.”)	Defines documentation boundaries and keeps information up to date and





	Page 3: “[...] il Syllabus è uno strumento di programmazione [...] le altre soluzioni [...] sono strumentali all’organizzazione, gestione ed erogazione.” (“[...] the Syllabus is a planning tool [...] other solutions are instrumental to organization, management and delivery.”) Page 4: “La sezione Avvisi deve essere inoltre periodicamente ripulita, eliminando comunicazioni datate o comunque non più rilevanti.” (“The Notices section must be periodically cleaned, removing outdated or no longer relevant communications.”)	traceable—key to transparent course delivery.
Governance Structures	Page 1: “A cura del Presidio della Qualità di Ateneo.” (“Prepared by the University Quality Assurance Unit.”) Page 3: “Fornire indicazioni specifiche in merito a quali uffici e servizi rivolgersi in caso di problematiche o richieste di chiarimento.” (“Provide specific indications on which offices and services to contact in case of problems or requests for clarification.”) Page 5: “Per quesiti [...] rivolgersi all’ufficio e-learning [...] rubrica@unibg.it [...] comunicazioni@unibg.it [...]” (“For questions [...] contact the e-learning office [...] the directory office [...] the communications office [...]”)	Assigns roles and contact points (PQA, e-learning, communications) for implementation and support—an operational governance scaffold.
Technical Standards & Interoperability	Page 4: “Moodle [...] è il Learning Management System (LMS) di Ateneo [...] soluzione da preferire come archivio di tutta la documentazione pertinente al corso.” (“Moodle is the University’s LMS [...] the preferred repository for all course documentation.”) Page 4: “Microsoft Teams [...] è integrato con [...] Sharepoint.” (“Microsoft Teams [...] is integrated with [...] SharePoint.”) Page 4: “Google Drive [...] completamente integrato alla gestione della posta elettronica istituzionale.” (“Google Drive [...] fully integrated with institutional email management.”)	Specifies enterprise platforms and integrations (LMS, Teams-SharePoint, Google Drive), indicating an interoperable digital ecosystem.
Accountability & Liability	Page 3: “Uniformare le modalità [...] comunicano agli studenti tutte le informazioni rilevanti.” (“Standardize the ways [...] by which instructors communicate all relevant information to students.”) Page 4: “La sezione Avvisi deve essere [...] periodicamente ripulita.” (“The Notices section must be [...] periodically cleaned.”)	Imposes content maintenance duties and clear channel usage, but no sanctions or formal liability rules are specified.
Sustainability	No explicit reference to environmental, social, or economic sustainability.	Operational/technical focus; sustainability not addressed.

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Category	Key Extracts (Doc D46)	Observations (coverage, strengths, weaknesses)
Ethics & Integrity	Page 3: “These Guidelines are formulated with the objective of providing universities and research institutions [...] with operational guidance to strengthen research security.”(Italian translation unavailable; English original.) Page 4: “Institutions should develop and prominently display dedicated web pages [...] for policies and practices related to research integrity and security.”(English original.) Page 5: “A Conflict of Interest (COI) refers to any circumstance in which an individual’s personal, professional, financial, or other interests [...] may diverge from their professional responsibilities.”(English original.)	Promotes institutional culture of research integrity, ethical conduct, and avoidance of conflicts of interest in research — core to ethical governance.
Data Privacy & Security	Page 5: “Researchers [...] should be informed and trained on basic cybersecurity practices, data protection measures, and the implications of cybersecurity for safeguarding research activities.”(English original.) Page 5: “Institutions should develop a cybersecurity risk management framework [...] including access controls, network and information system security, and incident response procedures.”(English original.)	Provides specific and actionable data protection and cybersecurity measures, including GDPR alignment and inter-agency cooperation.



	Page 5: “Institutions are expected to collaborate with the National Cybersecurity Agency [...] and the Italian Data Protection Authority (GDPR).”(English original.)	
Equity & Inclusion	Page 3: “Fostering Dialogue within the Research Community - Encourage open discussion on research integrity and security during meetings of the institution’s governing bodies and across the broader research community.”(English original.)	Promotes inclusive participation and equal access to training and dialogue in research governance; limited focus on social inclusion.
Transparency & Explainability	Page 3: “Institution-Wide Dissemination of Communications [...] with the aim of raising awareness and providing information on possible malicious interference by external actors.”(English original.) Page 3: “Dedicated Web Pages [...] should function as a ‘single digital access point’ for policies and practices related to research integrity and security.”(English original.) Page 5: “The self-assessment form and risk mitigation measures [...] should be used as tools for projects, collaborations, contracts, agreements, grants, and donations.”(English original.)	Mandates transparency through centralized communication, digital access, and public availability of research integrity information and self-assessment tools.
Governance Structures	Page 2: “This document was developed [...] by the Working Group on Research Security, established by the Ministry of University and Research.”(English original.) Page 3: “Institutions should develop [...] web pages [...] hosting institutional communications and informational materials, guidelines, and the requirements established by national authorities.”(English original.) Page 4: “Project leaders [...] may consult the institution’s designated contact point for research security and integrity [...] or the governing bodies of the institution for further guidance.”(English original.)	Establishes a multi-level governance structure involving the Ministry, universities, and national agencies; formalizes oversight roles for risk and integrity.
Technical Standards & Interoperability	Page 5: “Institutions should develop a cybersecurity risk management framework [...] including identification of critical information assets, data protection strategies, access controls, network and information system security.”(English original.) Page 6: “Italy [...] supports research institutions in assessing and managing such risks, in accordance with Regulation (EU) 2021/821, and in adopting Internal Compliance Programs.”(English original.)	References interoperability and harmonization with EU security and export-control regulations (Reg. 2021/821); aligns with EU technical frameworks.
Accountability & Liability	Page 4: “Project leaders [...] are encouraged to carry out a preliminary self-assessment of any potential risks [...] and update the self-assessment form whenever changes occur.”(English original.) Page 7: “Institutions should develop or update best practices [...] to track visits by external personnel [...] access logs should be maintained to record key information.”(English original.)	Introduces mechanisms of institutional and personal responsibility for risk evaluation and reporting; reinforces traceability and accountability.
Sustainability	Page 3: “These Guidelines [...] aim to strengthen research security [...] to enhance awareness, improve the resilience of the research system, and support [...] safeguarding measures.”(English original.) Page 5: “Institutions should implement cybersecurity measures [...] adopting safeguards proportionate to the level of risk, the sensitivity of the activity, and other contextual factors.”(English original.)	Promotes sustainable and resilient research ecosystems—conceptually aligned with digital and institutional sustainability rather than environmental focus.

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Category	Key Extracts (Doc D9 (D48))	Observations (coverage, strengths, weaknesses)
Ethics & Integrity	Page 1: “Promuove un utilizzo corretto, trasparente e responsabile, in una dimensione antropocentrica, dell’intelligenza artificiale [...]” (“It promotes a correct, transparent and responsible use of artificial intelligence in an anthropocentric dimension [...]”) • Page 2: “I sistemi e i modelli di intelligenza artificiale [...] devono essere sviluppati e applicati nel rispetto dell’autonomia e del potere decisionale dell’uomo [...] assicurando la sorveglianza e l’intervento umano.” (“AI systems and models [...]	Centers AI on human dignity, responsibility, and human-in-the-loop safeguards; sets ethical baseline for research, development, and use.





	must be developed and applied respecting human autonomy and decision-making power [...] ensuring human oversight and intervention.”) Page 2: “Nel rispetto [...] dei principi di trasparenza, proporzionalità, sicurezza, [...] accuratezza, non discriminazione, parità dei sessi e sostenibilità.” (“In compliance with the principles of transparency, proportionality, security, [...] accuracy, non-discrimination, gender equality and sustainability.”)	
Data Privacy & Security	Page 2: “Deve essere assicurata [...] la cybersicurezza lungo tutto il ciclo di vita dei sistemi [...] nonché l'adozione di specifici controlli di sicurezza [...]” (“Cybersecurity must be ensured throughout the lifecycle of systems [...] as well as the adoption of specific security controls [...]”) Page 2: “Il trattamento [...] dei dati personali [...] in conformità al diritto dell'Unione europea [...] di tutela della riservatezza.” (“Processing of personal data [...] shall comply with EU law [...] and privacy protection.”) Page 2–3: “Le informazioni [...] sono rese con linguaggio chiaro e semplice [...] il diritto di opporsi ai trattamenti [...] L'accesso [...] da parte dei minori [...] richiede il consenso di chi esercita la responsabilità genitoriale.” (“Information is provided in clear and simple language [...] the right to object to processing [...] Access by minors [...] requires parental consent.”)	Mandates GDPR-consistent lawful, fair, and transparent processing; lifecycle security and risk-based controls; special protections for minors.
Equity & Inclusion	Page 2: “Nel rispetto [...] dei principi di [...] non discriminazione, parità dei sessi [...]” (“In compliance with the principles of [...] non-discrimination and gender equality [...]”) Page 2: “La presente legge garantisce alle persone con disabilità il pieno accesso ai sistemi di intelligenza artificiale [...] su base di uguaglianza e senza alcuna forma di discriminazione.” (“This law guarantees persons with disabilities full access to AI systems [...] on an equal basis and without any form of discrimination.”) Page 4: “L'introduzione di sistemi [...] nel sistema sanitario non può selezionare e condizionare l'accesso [...] secondo criteri discriminatori.” (“The introduction of AI systems in healthcare may not select or condition access [...] based on discriminatory criteria.”)	Explicit non-discrimination, disability access, and fair access in healthcare; supports inclusive AI adoption.
Transparency & Explainability	Page 2: “Conoscibilità, [...] trasparenza, [e] spiegabilità [...] assicurando la sorveglianza e l'intervento umano.” (“Knowability, transparency, and explainability [...] ensuring human oversight and intervention.”) Page 2: “Le informazioni e le comunicazioni [...] sono rese con linguaggio chiaro e semplice [...] a garantire all'utente la conoscibilità dei relativi rischi.” (“Information and communications [...] are provided in clear and simple language [...] to ensure user awareness of related risks.”) Page 8: “Assicurando [...] la conoscibilità del suo funzionamento e la tracciabilità del suo utilizzo.” (“Ensuring [...] knowability of its functioning and traceability of its use.”)	Requires clear disclosures, explainability, and traceability, notably in public administration; aligns with AI Act transparency duties.
Governance Structures	Page 9–10: “La strategia nazionale per l'intelligenza artificiale è predisposta [...] ed è approvata [...] dal Comitato interministeriale per la transizione digitale (CITD).” (“The national AI strategy is prepared [...] and approved [...] by the Interministerial Committee for Digital Transition (CITD).”) Page 11: “L'AgID e l'ACN sono designate quali Autorità nazionali per l'intelligenza artificiale [...]” (“AgID and ACN are designated as the national authorities for artificial intelligence [...]”) Page 11: “È istituito un Comitato di coordinamento [...] composto dai direttori generali delle due citate Agenzie e dal capo del Dipartimento per la trasformazione digitale.” (“A coordination committee is established [...] comprising the Directors-General of the two Agencies and the head of the Department for Digital Transformation.”)	Defines national authorities (AgID, ACN), strategic governance (CITD), and inter-agency coordination—clear oversight architecture.
Technical Standards & Interoperability	Page 3: “Indirizzano le piattaforme di e-procurement [...] privilegiate [...] soluzioni che garantiscono la localizzazione [...] dei dati strategici presso data center posti nel territorio nazionale [...] elevati standard in termini di sicurezza e trasparenza nelle modalità di addestramento.” (“Public e-procurement platforms should	Points to localization, security-by-design, and sectoral technical safeguards; establishes a baseline but not detailed interoperability specs.



	prefer solutions that ensure strategic data are processed in national data centers [...] with high standards of security and transparency in training methods.”) Page 4: “Ai trattamenti di dati personali [...] effettuati dall'Agenzia per la cybersicurezza nazionale si applicano le disposizioni [...] del decreto-legge n. 82 del 2021.” (“For personal data processing by the National Cybersecurity Agency, the provisions of Decree-Law No. 82/2021 apply.”) Page 6: “L'AGENAS [...] specifica [...] le misure tecniche e organizzative per garantire un livello di sicurezza adeguato al rischio.” (“AGENAS [...] specifies [...] technical and organizational measures to ensure a security level appropriate to risk.”)	
Accountability & Liability	Page 14: “Attribuire [...] alle autorità [...] il potere di imporre le sanzioni [...] previste dall'articolo 99 del regolamento (UE) 2024/1689.” (“Grant authorities the power to impose sanctions [...] provided for by Article 99 of Regulation (EU) 2024/1689.”) Page 16: “Art. 612-quater [...] Illecita diffusione di contenuti generati o alterati con sistemi di intelligenza artificiale [...] è punito con la reclusione da uno a cinque anni.” (“Art. 612-quater [...] Unlawful dissemination of content generated or altered with AI [...] is punishable by imprisonment from one to five years.”) Page 17: “È fatto obbligo a chiunque spetti di osservarla e di farla osservare come legge dello Stato.” (“It is incumbent on all concerned to comply with and enforce this law.”)	Creates enforceable sanctioning powers and new offences (deepfake dissemination); strengthens administrative and criminal accountability.
Sustainability	Page 2: “Nel rispetto [...] dei principi di [...] sostenibilità.” (“In compliance with the principle of sustainability.”) Page 12: “Lo Stato favorisce l'accessibilità ai sistemi di intelligenza artificiale [...] a una maggiore inclusione [...] delle persone con disabilità.” (“The State promotes access to AI systems [...] for greater inclusion of persons with disabilities.”) Page 12–13: “Investimenti [...] fino all'ammontare complessivo di un miliardo di euro [...] nei settori dell'intelligenza artificiale, della cybersicurezza e delle tecnologie abilitanti [...]” (“Investments [...] up to a total amount of one billion euros [...] in AI, cybersecurity and enabling technologies [...]”)	Frames sustainability as digital, social, and economic resilience, with targeted investments and inclusive access initiatives.

Replicate table for each document

Category	Key Extracts (Doc E3)	Observations (coverage, strengths, weaknesses)
Ethics & Integrity	Page 8: “High quality and inclusive digital education, which respects the protection of personal data and ethics, needs to be a strategic goal of all bodies and agencies active in education and training.”(English original.) Page 12: “To promote understanding of emerging technologies and their applications in education, develop ethical guidelines on artificial intelligence (AI) and data usage in teaching and learning for educators.”(English original.)	Embeds ethics and responsibility as core values of digital transformation in education; introduces ethical AI guidance for educators.
Data Privacy & Security	Page 8: “High quality and inclusive digital education, which respects the protection of personal data and ethics...”(English original.) Page 12: “Develop ethical guidelines on artificial intelligence (AI) and data usage in teaching and learning for educators.”(English original.)	Ensures data protection within educational technology adoption, aligning with GDPR and reinforcing cybersecurity awareness in education.
Equity & Inclusion	Page 8: “Digital education should play a pivotal role in increasing equality and inclusiveness.”(English original.) Page 9: “Digital literacy is essential for life in a digitalised world... Digital education and skills should also take into account environmental and climate impacts.”(English original.) Page 13: “Women accounted for 54% of all tertiary students in the EU in 2017, yet they are particularly underrepresented in the digital sectors.”(English original.)	Strong focus on inclusion, gender balance, and equitable digital participation; promotes access for disadvantaged groups and women in STEM.
Transparency & Explainability	Page 10: “A trusted digital education ecosystem requires high-quality content, user-friendly tools, value-adding services and secure platforms that maintain privacy and uphold ethical standards.”(English original.)	Promotes transparency in digital tools, content, and governance; fosters





	Page 16: "Establish a European Digital Education Hub... addressing issues such as interoperability, quality assurance, environmental sustainability, accessibility and inclusion and common standards for digital education."(English original.)	explainability and accountability for AI use in education.
Governance Structures	Page 10: "Promoting high-quality and inclusive digital education must be a common endeavour across society... Governments, education and training institutions, the private sector and the public all need to be engaged."(English original.) Page 16: "Establish a European Digital Education Hub to support Member States by setting up a network of national advisory services on digital education..."(English original.)	Defines EU-level multi-stakeholder governance via national advisory services and shared responsibility mechanisms.
Technical Standards & Interoperability	Page 11: "Develop a European Digital Education Content Framework... include guiding principles for specific sectors of education and their needs... reflecting the need for interoperability, certification, verification and transferability of content."(English original.) Page 16: "Support cross-sector collaboration and new models for the seamless exchange of digital learning content, addressing issues such as interoperability, quality assurance, environmental sustainability, accessibility and inclusion."(English original.)	Establishes EU-wide digital content framework emphasizing interoperability, certification, and open access.
Accountability & Liability	Page 12: "Develop ethical guidelines on artificial intelligence (AI) and data usage in teaching and learning for educators, accompanied by a training programme."(English original.) Page 15: "Develop common guidelines for teachers and educational staff to foster digital literacy and tackle disinformation through education and training."(English original.)	Provides mechanisms of responsibility and capacity building for teachers and institutions to ensure ethical and lawful use of digital tools.
Sustainability	Page 9: "Digital education and skills should also take into account environmental and climate impacts of the development and use of digital equipment and services."(English original.) Page 16: "Support cross-sector collaboration... addressing environmental sustainability, accessibility and inclusion."(English original.)	Connects digital education to the European Green Deal; emphasizes sustainable digital infrastructure and eco-conscious design.

Replicate table for each document

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:	D13
Gaps:	The only identified gap is the absence of explicit guidance on technical interoperability and standardization.
Overlaps	The framework shows strong alignment with EU AI Act, GDPR, EU ethical AI standards, AGID principles, UNESCO guidance, and sustainability goals.
Inconsistencies	No inconsistencies were found across the evaluated areas.
Doc ID:	D14





Gaps:	No relation with AI. Missing elements include detailed technical interoperability requirements and explicit sustainability provisions.
Overlaps	The framework aligns with national public-sector ethics rules, GDPR and AGID/Garante guidance, anti-discrimination law, FOIA/open-data rules, ANAC governance provisions, and related university policies.
Inconsistencies	No inconsistencies were identified
Doc ID:	D15
Gaps:	It lacks explicit GDPR references, contains no technical or interoperability guidance, and does not address sustainability.
Overlaps	The document aligns with UniBg ethical principles, institutional inclusion and transparency policies, and overlaps with the university Code of Conduct.
Inconsistencies	No inconsistencies are present, although responsibilities are defined without corresponding sanctions
Doc ID:	D16/E6/D47
Gaps:	No mention of AI. Only an indirect connection to environmental sustainability
Overlaps	The framework is strongly aligned with the EU Charter of Fundamental Rights, the AI Act, NIS2 (published after this document), ISO/IEC 27001, and EU non-discrimination, transparency, oversight, governance, and liability standards.
Inconsistencies	No inconsistencies are identified.
Doc ID:	D17
Gaps:	It provides no explicit data-protection guidance and lacks defined technical interoperability standards. While digital technologies are mentioned, AI and its use are not.
Overlaps	The document aligns with institutional ethical codes, national university charters, EU gender equality frameworks, public-sector transparency rules, governance standards, performance management frameworks, and Agenda 2030 sustainability goals.
Inconsistencies	No inconsistencies are identified
Doc ID:	D18
Gaps:	It does not address AI systems or data interoperability and provides only an indirect link to environmental sustainability.
Overlaps	The text aligns with EU academic ethics, UNESCO AI ethics, GDPR principles, EU equality directives, scientific transparency norms, and institutional governance and integrity frameworks.
Inconsistencies	No inconsistencies are identified
Doc ID:	D19
Gaps:	The document lacks explicit security controls, anti-discrimination requirements, logging or transparency obligations, technical standards, accountability mechanisms, and any sustainability considerations.
Overlaps	thical and operational practices are referenced indirectly through platform rules and basic GDPR principles, but without formal code-of-conduct, inclusion, or governance standards.
Inconsistencies	No structural inconsistencies emerge; the main issue is the absence of several expected governance and compliance elements.
Doc ID:	D46
Gaps:	No mention of AI. Just a brief list of suggestions and recommendations as well as external sources to check for additional information.
Overlaps	As it explicitly suggests to refer to them, the framework is fully aligned with EU and national ethics requirements, GDPR, NIS2, cybersecurity standards, open-access rules, Italian governance norms, and responsible research principles.
Inconsistencies	No inconsistencies are identified.
Doc ID:	D48
Gaps:	It lacks explicit API or data-format standards, relies on future decrees for liability coordination, and does not address environmental sustainability.



Overlaps	The framework aligns with the EU AI Act, GDPR, and sector-specific regulations, reinforcing equality duties and integrating with national regulators and oversight bodies.
Inconsistencies	No inconsistencies are identified
Doc ID:	E3
Gaps:	No mandatory enforcement mechanisms are provided, as the framework relies solely on soft governance.
Overlaps	The framework is fully aligned with the EU AI Act, GDPR, EU cybersecurity norms, equality and skills strategies, transparency obligations, governance coordination principles, interoperability standards, and EU sustainability goals.
Inconsistencies	No inconsistencies are identified

Replicate the table for each document

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 (High/Medium/Low)	Potential Impact	Source Doc ID(s)	Mitigation or Policy Response
01	Privacy breaches	High	entering personal data into prompts may violate confidentiality and GDPR, with possible legal consequences.	D13	● Avoid entering sensitive or personal data into prompts. ● Comply with internal guidelines on AI usage. ● Consult the Instructor when rules are unclear. ● Ensure transparency by documenting AI use.
02	Copyright and plagiarism risks	Medium-High	uncontrolled AI use may lead to plagiarism or use of copyrighted materials, causing reputational and legal issues.	D13	● Do not share instructors' materials on AI tools. ● Do not copy and paste AI-generated content directly into one's work. ● Do not use AI to write or rewrite one's own work. ● Verify, review, and correct AI-generated text, checking sources. ● Adopt assessment methods that limit inappropriate AI use.
03	Data security breaches	High	improper handling of information may compromise data protection.	D13	● Avoid entering sensitive or personal data into prompts. ● Comply with internal guidelines on AI usage.
04	Bias and discrimination in decision-making	Medium	AI systems may reproduce human biases and stereotypes present in training data.	D13	● Verify, review, and correct AI-generated text, checking sources. ● Participate in training on good practices and risks. ● Support Students in effective and appropriate AI use.
05	Technological dependence and loss of control	Medium-High	excessive reliance on AI may undermine autonomy and critical thinking.	D13	● Ensure that the submitted work reflects actual acquired competences. ● Do not use AI to write or rewrite one's own work. ● Do not ask AI to directly answer evaluation questions. ● Adopt assessment methods that require authentic student performance.
06	Inaccuracy and misinterpretation	Medium-High	AI may generate factually incorrect, incomplete, or misleading	D13	● Verify, review, and correct all AI-generated text. ● Consult the Instructor before generating content when rules are unclear.





			information, often based on superficial pattern matching rather than content understanding.		● Ensure transparency in documenting AI-assisted steps. ● Participate in training on proper usage and risks.
07	Environmental impact	Medium	large-scale AI models require substantial computational resources.	D13	● Use AI tools consciously and only when necessary. ● Support Students in choosing appropriate and efficient AI uses.
08	Lack of skill acquisition	High	excessive reliance on AI may prevent students from developing the knowledge and competences required for exams or degree completion.	D13	● Ensure that the work allows proper assessment of competences. ● Do not use AI to write or rewrite one's own work. ● Do not ask AI to answer evaluation questions. ● Adopt assessment formats that encourage genuine learning.

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.

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?	Italy has adopted in September 2025 a law related to AI in connection with the AI act and digital regulations. UniBg institutional documents well received the recent EU-level policies. The most eviden document id document D1, which exemplifies and describes AI adoption guidelines in accordance with EU regulations as well as highlighting the importance of ethical, responsible and transparent use. Such guidelines were presented in July 2025, before the Italian law.
Extent of Implementation	Was implementation partial or full? Provide brief reasoning and examples.	UniBg has adopted specific AI guidelines in July 2025.
Institutional Adoption of AI Regulations	How has your institution implemented or enforced AI-related guidelines (e.g., academic policies, staff guidance, committees)?	In November 2023, UniBg created a University-level working group on the topic of AI with 8 researchers/professors, each belonging to one of the 8 departments of the university. The working group, in July 2024, released a white paper ("AI: A research agenda") with reflections on AI future directions and ethics implications. The working group also organized 2 separated workshops on the theme of AI, involving researchers form UniBg to create connections and research opportunities. Additionally, an internal grant aimed at sustaining intra-departmental research on AI and sustainability was established. In November/December 2024, UniBg organized 4 seminars aimed ad instructing academic staff on how to adopt AI in courses. Since November 2025, UniBg has bought licences for ChatGPT for the major part of the academic staff and, since a few months, is running seminars and workshops to spread awareness on the use and research on AI.





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.

Italy adopted, as of September 2025, a national law that *receives* and implements the requirements of the EU AI Act, regulating AI-related behaviour within the country. National policies are more high-level than institutional ones, which is expected given their need to remain broad and applicable across diverse institutions. In this regard, it is useful to reference the MUR document “*Guidelines for Research Institutions for Integrity and Security of Research*”, which follows a similar approach: it identifies the key principles that institutions must consider and then directs them to external links and more specialised documents for operational detail. This model illustrates how institutions are expected to receive high-level directives and convert them into concrete, context-specific measures.

UniBg issued internal guidelines on the adoption and use of AI in July 2025. These guidelines are strongly aligned with EU regulations on AI and GDPR and build on the university’s longstanding ethical and conduct policies for staff and students developed over previous years. Although earlier institutional policies were not designed specifically with AI in mind, they remain sufficiently broad to cover the general ethical and behavioural principles required for fair and responsible AI use. The AI guidelines include some practical examples, but these remain at an intermediate level of detail. This is understandable, given the difficulty of covering all possible scenarios and the need to ensure conciseness and usability. However, in several cases, more detailed examples would support clearer understanding of how to apply the guidelines in specific academic situations. Moreover, the document does not provide technical requirements or guidance on infrastructure, interoperability, or implementation processes.

Building on these aspects, and learning from the best practices already inside the analyzed documents, PATH-AI should provide, where necessary, more granular and operationally useful guidance, including:

- More detailed and practical instructions alongside high-level principles.
- Clear definitions of acceptable and prohibited uses of generative AI in coursework.
- Procedures for documenting AI-assisted steps in assignments and learning activities.
- Detailed explanations of risks related to privacy, copyright, bias, inaccuracy, and over-reliance on AI tools.
- Specific countermeasures such as verification protocols, examples of compliant and non-compliant behaviour, and case-based scenarios reflecting common academic settings.
- References to external standards, technical resources, and sector-specific documents—following the model of the MUR “*Guidelines for Research Institutions for Integrity and Security of Research*”.
- Measures that strengthen instructors’ and students’ ability to use generative AI fairly, transparently, and effectively in teaching and learning contexts.

This added level of detail would ensure a clearer, more consistent, and pedagogically sound integration of generative AI across educational activities.





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).

