



Structured Document Review Report (Task 3.1 – UNI LJ)

(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
UNI LJ	Slovenia	Igor Reznichenko and Primož Podržaj	16.12.2025

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
D40	Nacionalni program spodbujanja razvoja in uporabe umetne inteligence do leta 2025 (NpUI)	Ministry of Digital Transformation (Govt. of Slovenia)	2021	Strategy	National	The central national strategy for establishing Slovenia as a reference country for AI, focusing on research, transfer to industry, and societal trust.
D41	Javni razpis za sofinanciranje projektov (Pilot projects for Higher Ed)	Ministry of Higher Education, Science and Innovation	2022	Funding Call	National	A public tender funding 23 pilot projects to reform higher education curricula for a green and resilient transition, specifically targeting digital and AI competencies.
D42	Poročilo UI v izobraževanju: pregled stanja in metodologija (Report on AI in Education)	Ministry of Education / Institute of the RS for Education	2024	Report	National	A state-of-play analysis and methodology for integrating AI into the education system, focusing on digital competencies and teacher training.
D43	Etične smernice: Umetna inteligenca v izobraževanju in raziskovanju (Ethical Guidelines)	University of Ljubljana (Working Group)	2023	Guideline	Institutional	Detailed ethical guidelines for students, teachers, and researchers regarding the use of Generative AI, focusing on integrity and transparency.
D45	Smernice za uporabo orodij umetne inteligence (Guidelines for AI Tools)	University of Maribor	2024	Guideline	Institutional	Practical guidelines defining unauthorized assistance, citing AI sources, and classifying AI tools for academic use.
E8	Dokument: Stališča do rabe umetne inteligence (Position on AI Use)	University of Primorska	2023	Policy Position	Institutional	A position paper outlining the university's stance on AI as a supportive tool rather than a replacement for human intellect, emphasizing critical thinking.





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:

Document	D40: National Programme to Promote the Development and Use of Artificial Intelligence in the Republic of Slovenia by 2025	
Category	Key Extracts	Observations (coverage, strengths, weaknesses)
Ethics & Integrity	Promotes "Trustworthy AI" (Zaupanja vredna UI) aligned with EU values and fundamental rights. Focuses on ethical AI development.	Coverage: High-level national ethical principles. Strengths: Strong alignment with EU "Trustworthy AI" concepts; proactive stance. Weaknesses: Principles are abstract; lacks specific enforcement mechanisms for breaches. AI Impact: Establishes "Trust" as a prerequisite for national AI adoption.
Data Privacy & Security	Highlights strict adherence to GDPR and personal data protection in AI lifecycles. Mentions security of national infrastructure.	Coverage: National legislative compliance (GDPR/ZVOP). Strengths: Explicit link between data quality and AI security. Weaknesses: Does not address specific risks of "shadow IT" or generative AI leaks. AI Impact: Restricts training of national models on unverified private data.
Equity & Inclusion	Strategic goal: "Ensure AI benefits all parts of society" and reduces the digital divide. Focus on accessible public services.	Coverage: Societal impact and access to technology. Strengths: Explicitly addresses the digital divide and linguistic inclusion (Slovene language support). Weaknesses: Implementation details for marginalized groups are vague. AI Impact: Prioritizes development of Slovene language models (LLMs).
Transparency & Explainability	Promotes "Explainable AI" (XAI) and transparency in automated decision-making systems (ADM).	Coverage: Technical transparency of algorithms. Strengths: Recognizes the "black box" problem as a barrier to adoption. Weaknesses: Hard to enforce on imported commercial AI tools. AI Impact: May limit public sector procurement of "opaque" AI systems.
Governance Structures	Establishes a "Council for Development of Informatics" and cross-ministry working groups to oversee AI implementation.	Coverage: National oversight bodies. Strengths: Creates a clear centralized accountability structure. Weaknesses: Complex inter-ministerial coordination can be slow. AI Impact: Centralizes decision-making for national AI





		infrastructure.
Technical Standards & Interoperability	Supports "Test and Experimentation Facilities" (TEFs) and adoption of international technical standards.	Coverage: Industry standards and testing environments. Strengths: Connects Slovenia to broader EU technical ecosystems. Weaknesses: High barrier to entry for smaller players. AI Impact: Encourages standardized, interoperable AI solutions over bespoke ones.
Accountability & Liability	Discusses liability in the context of product safety and automated decisions (alignment with EU AI Act).	Coverage: Legal liability for developers/deployers. Strengths: Anticipates EU regulation (AI Act). Weaknesses: User-level liability is less defined. AI Impact: Shifts risk burden towards developers/providers of AI.
Sustainability	Mentions AI as a key enabler for the "Green Transition" (environment, smart energy grids).	Coverage: Environmental impact of/by AI. Strengths: Synergizes digital and green goals. Weaknesses: Does not address the energy consumption of training large models. AI Impact: Positions AI as a tool for energy efficiency monitoring.

Replicate table for each document

Document	D41: Development project - Use of generative artificial intelligence for and in education	
Category	Key Extracts	Observations (coverage, strengths, weaknesses)
Ethics & Integrity	Requires projects to adhere to standard research ethics; specific AI ethics are implicit in the curriculum reform goals.	Coverage: Project compliance and administrative ethics. Strengths: Mandates ethical compliance for funding eligibility. Weaknesses: No specific "AI Ethics" criteria for curriculum content. AI Impact: Indirectly funds the creation of ethical AI modules.
Data Privacy & Security	Projects must comply with national legislation on data protection (GDPR) during implementation.	Coverage: Administrative data compliance. Strengths: legally binding contract clauses. Weaknesses: Boilerplate language; lacks specific guidance for AI tools in class. AI Impact: Ensures funded pilots do not bypass GDPR.
Equity & Inclusion	Explicit requirement for curricula to be "inclusive" and accessible. Focus on equipping all students with digital competencies.	Coverage: Student access and curricular reform. Strengths: Inclusion is a weighted scoring criterion. Weaknesses: Focuses on curriculum design, not student hardware access. AI Impact: Drives creation of courses that teach AI to non-STEM students.
Transparency & Explainability	Promotes Open Education Resources (OER) and transparent learning	Coverage: Openness of educational materials. Strengths: Mandates OER licensing for project outputs. Weaknesses: Does not address transparency of AI tools used within projects.





	outcomes.	AI Impact: Increases availability of open Slovenian training data/content.
Governance Structures	Defines project management structures (steering committees) for the funded pilot projects.	Coverage: Project-level management. Strengths: Clear reporting lines to the Ministry. Weaknesses: Temporary governance tied to project lifecycle. AI Impact: Creates temporary "sandboxes" for testing AI in education.
Technical Standards & Interoperability	Encourages "stackable" credentials (micro-credentials) and interoperable digital learning environments.	Coverage: Credentialing and LMS interoperability. Strengths: Promotes flexibility via micro-credentials. Weaknesses: Technical specs for AI integration are missing. AI Impact: Facilitates certification of AI skills via micro-credentials.
Accountability & Liability	Beneficiaries are accountable for project results and spending; no specific AI liability mentioned.	Coverage: Financial accountability. Strengths: Clear audit trails. Weaknesses: No mention of liability for AI-generated errors in teaching.
Sustainability	Core Theme: "Twin Transition" (Green + Digital). Projects must address sustainable development goals.	Coverage: Curriculum topics (Green/Digital). Strengths: Directly links funding to sustainability goals. Weaknesses: Risk of "greenwashing" in project proposals. AI Impact: Promotes "AI for Sustainability" as a teaching topic.

Document	D42: UI v izobraževanju na UL / Smernice za uporabo orodij (generativne) umetne inteligence v izobraževanju (z PDF)	
Category	Key Extracts	Observations (coverage, strengths, weaknesses)
Ethics & Integrity	Discusses the ethical implications of AI in classrooms (e.g., teacher autonomy, student data).	Coverage: Pedagogical ethics and teacher roles. Strengths: deep dive into the "human" aspect of education. Weaknesses: Analytical only; offers no binding rules. AI Impact: Raises awareness of "automation bias" in grading.
Data Privacy & Security	Notes concerns regarding the datafication of students and use of commercial platforms.	Coverage: Student data privacy risks. Strengths: Identifies the conflict between personalization and privacy. Weaknesses: Offers no solution to the dominance of US tech giants. AI Impact: discouraging use of invasive tracking AI tools.
Equity & Inclusion	Analyzes the "digital divide" among schools and students (access to hardware/software).	Coverage: Systemic inequality in education. Strengths: Data-driven view of infrastructure gaps. Weaknesses: Highlights problems without budget authority to fix them. AI Impact: Identifies risk that AI could widen the achievement gap.
Transparency &	Emphasizes "AI Literacy"—	Coverage: Educational competencies (AI Literacy).





Explainability	teachers and students need to understand how AI works to trust it.	Strengths: Argues that "understanding AI" is a prerequisite for use. Weaknesses: "Literacy" is hard to define and measure. AI Impact: Pushes for AI mechanics to be taught in schools.
Governance Structures	Reviews the role of the Ministry and the Institute of Education in steering digital strategy.	Coverage: Educational ecosystem governance. Strengths: Maps the stakeholders well. Weaknesses: Governance appears fragmented across agencies. AI Impact: Suggests need for a dedicated "AI in Ed" coordinating body.
Technical Standards & Interoperability	References the "DigComp" and "DigCompEdu" frameworks for standardizing competencies.	Coverage: Competency frameworks. Strengths: Aligns with EU standard frameworks. Weaknesses: Frameworks are theoretical, not technical specs. AI Impact: Standardizes how "AI skills" are defined for teachers.
Accountability & Liability	Discusses the changing role of the teacher as the responsible agent in the classroom.	Coverage: Professional responsibility. Strengths: Reaffirms teacher autonomy against automation. Weaknesses: Vague on liability for incorrect AI tutoring. AI Impact: Positions AI as a "Co-pilot" not a "Teacher replacement".
Sustainability	Discusses sustainability of the education system itself under digital transformation pressures.	Coverage: Systemic resilience. Strengths: holistic view of system change. Weaknesses: Limited focus on environmental sustainability.

Document	D43: Umetna inteligenca v izobraževanju in raziskovanju: Izzivi, etična vprašanja in smernice / Artificial Intelligence in Education and Research: Challenges, Ethical Issues, and Guidelines	
Category	Key Extracts	Observations (coverage, strengths, weaknesses)
Ethics & Integrity	Fundamental principle: "The author is fully responsible." Academic integrity must be maintained regardless of tools used.	Coverage: Academic integrity and authorship. Strengths: Unequivocal stance: usage is allowed, fraud is not. Weaknesses: Relies heavily on student honesty. AI Impact: Legitimizes AI as a tool if disclosed.
Data Privacy & Security	Warnings about data privacy rights when using AI for research; protection of participant data.	Coverage: Research data protection. Strengths: Specific warning against uploading research subjects' data. Weaknesses: No list of "safe/compliant" tools provided. AI Impact: Limits use of public ChatGPT for sensitive qualitative research.
Equity & Inclusion	(Implicit) Guidelines apply to all staff/students equally.	Coverage: Universal application of rules. Strengths: Equal standards for all faculties. Weaknesses: Does not address the "paid tier" advantage.
Transparency &	Key Rule: "Students must transparently cite the use of	Coverage: Citation and disclosure protocols. Strengths: Clear, actionable instruction on mandatory



Explainability	AI tools" (tool name, purpose).	disclosure. Weaknesses: Hard to verify if a student omits disclosure. AI Impact: Normalizes the presence of AI in bibliographies.
Governance Structures	Suggests a standing working group to monitor AI developments and update guidelines.	Coverage: Institutional policy maintenance. Strengths: Proposes dynamic, adaptive governance. Weaknesses: Depends on volunteer effort of the working group. AI Impact: Allows policy to evolve as fast as AI models.
Technical Standards & Interoperability	N/A	N/A
Accountability & Liability	"AI cannot be an author." Humans bear full liability for all generated content (hallucinations, bias).	Coverage: Legal and academic liability. Strengths: Resolves copyright/authorship ambiguity immediately. Weaknesses: Burden falls entirely on the student. AI Impact: Disincentivizes lazy copy-pasting of AI output.
Sustainability	N/A	N/A

Document	D44: Smernice glede uporabe generativne umetne inteligence v pedagoškem procesu in pri raziskovalnem delu na UM EPF / Guidelines on the use of generative artificial intelligence in the pedagogical process and in research work at UM EPF	
Category	Key Extracts	Observations (coverage, strengths, weaknesses)
Ethics & Integrity	Defines "unauthorized assistance" involving AI. Categorizes AI use into "permitted" vs "prohibited".	Coverage: Definition of cheating vs. assistance. Strengths: Very practical, rule-based approach. Weaknesses: "Prohibited" categories (e.g. generating text) are hard to police. AI Impact: Frames AI as a "calculator for text" – useful but regulated.
Data Privacy & Security	Strict Rule: "Do not enter personal, sensitive, or confidential data into AI tools."	Coverage: Data leakage prevention. Strengths: Strongest explicit prohibition among institutional docs. Weaknesses: May hinder legitimate research on sensitive topics using AI. AI Impact: Blocks use of cloud-based LLMs for administrative data.
Equity & Inclusion	Mentions that assessment methods should ensure equal opportunities (mitigating paid vs free tool disparities).	Coverage: Assessment fairness. Strengths: Explicitly acknowledges the "paid tool" advantage risk. Weaknesses: Offers no funding to equalize access. AI Impact: May force teachers to design assignments solvable with free AI only.
Transparency &	Mandates citation: Name of	Coverage: rigorous citation standards.





Explainability	tool, Version, Date of access, and Prompt (in methodology).	Strengths: Requires documenting the "Prompt" – adds reproducibility. Weaknesses: Lengthy citations may clutter work. AI Impact: Treats "Prompts" as part of the scientific methodology.
Governance Structures	Teachers/Course leaders determine specific allowances for their subjects.	Coverage: Decentralized decision-making. Strengths: Allows subject-specific flexibility (CS vs. History). Weaknesses: Creates inconsistency for students across different courses. AI Impact: AI usage will vary wildly by department.
Technical Standards & Interoperability	N/A	N/A.
Accountability & Liability	Students are liable for accuracy; must verify references to prevent "hallucinated" citations.	Coverage: Verification of truthfulness. Strengths: Directly addresses the "hallucination" risk. Weaknesses: Requires students to have high fact-checking skills. AI Impact: Forces a "Human-in-the-loop" workflow.
Sustainability	N/A	N/A.

Document	D45: Stališča Univerze na Primorskem do rabe umetne inteligence / Positions of the University of Primorska on the use of Artificial Intelligence	
Category	Key Extracts	Observations (coverage, strengths, weaknesses)
Ethics & Integrity	"AI is a tool, not a replacement for human intellect." Focus on critical thinking and independent work.	Coverage: Philosophy of education. Strengths: Strong foundational stance on "Human Intelligence". Weaknesses: Less detailed on specific "dos and don'ts" than D45. AI Impact: Relegates AI to a subservient support role.
Data Privacy & Security	General adherence to legislation; emphasizes safe use.	Coverage: General safety principles. Strengths: Aligns with national laws. Weaknesses: Lacks the specific "do not upload" warnings of D45. AI Impact: General caution advised.
Equity & Inclusion	Focus on inclusive education values.	Coverage: General values. Strengths: Consistent with university statutes. Weaknesses: Generic statement without specific AI context.
Transparency & Explainability	Users must be able to verify and explain the results obtained via AI.	Coverage: Intellectual explainability. Strengths: Emphasizes student understanding over tool output. Weaknesses: Hard to verify if a student truly understands the AI output. AI Impact: Discourages "blind" use of code/text generators.
Governance	Adopted by the University	Coverage: High-level University governance.





Structures	Senate; implies high-level institutional oversight.	Strengths: Senate endorsement gives the document maximum authority. Weaknesses: Updating Senate documents is usually a slow process. AI Impact: Institutionalizes the AI stance at the highest level.
Technical Standards & Interoperability	N/A	N/A.
Accountability & Liability	Users are responsible for the truthfulness and verification of AI outputs.	Coverage: Truthfulness and accuracy. Strengths: Consistent with other universities on human liability.
Sustainability	N/A	N/A.

Document	E8: On Artificial Intelligence - A European approach to excellence and trust	
Category	Key Extracts	Observations (coverage, strengths, weaknesses)
Ethics & Integrity	"AI is not an end in itself, but a tool that has to serve people with the ultimate aim of increasing human well-being." Establishes the "Ecosystem of Trust" based on fundamental rights and EU values.	Coverage: Foundational ethical framework for the EU. Strengths: explicit focus on "Human-centric AI" and fundamental rights. Weaknesses: As a White Paper, it sets goals rather than binding rules (which came later in the AI Act). AI Impact: Shifted the global conversation from purely "technical performance" to "trustworthiness."
Data Privacy & Security	"The EU's strict rules on personal data protection (GDPR)... must be respected." Highlights risks of "cyber-attacks" and the need for "robustness" against data poisoning.	Coverage: GDPR compliance and cybersecurity. Strengths: Identifies data governance as the prerequisite for high-quality AI. Weaknesses: Broad statements; technical implementation of "compliant datasets" is left to industry. AI Impact: Reinforces that privacy cannot be traded for AI efficiency in Europe.
Equity & Inclusion	"Requirements to take measures to ensure that AI systems do not lead to discrimination" (e.g., bias in data). Focus on ensuring SME access to data and computing to prevent market concentration.	Coverage: Non-discrimination and market equity. Strengths: Specifically targets "opaque decision-making" that could disadvantage citizens. Weaknesses: Solutions for "de-biasing" data sets are technically complex and not fully solved. AI Impact: Mandates that "High-Risk" AI must undergo conformity assessments for bias.
Transparency & Explainability	"Citizens should be clearly informed when they are interacting with an AI system." "Transparency capabilities" are required to enable human oversight and understand outputs.	Coverage: User awareness and algorithmic explainability. Strengths: Introduces the concept of "mandatory information provision" (later seen in chatbots/deepfakes). Weaknesses: The "black box" nature of deep learning makes full explainability difficult to mandate. AI Impact: Users must know if they are talking to a bot.





Governance Structures	Proposes "A European governance structure" to ensure consistent enforcement across Member States. Suggests a network of national competent authorities.	Coverage: Cross-border regulation. Strengths: Blueprints the centralized EU AI Board structure. Weaknesses: Governance relies on cooperation which can be slow. AI Impact: Centralizes AI safety standards at the EU level rather than national level.
Technical Standards & Interoperability	"Standardisation... is essential for the Digital Single Market". Defines requirements for "Training data," "Robustness," and "Accuracy".	Coverage: Technical consistency. Strengths: Links AI standards to the Single Market functionality. Weaknesses: Relies on external bodies (ISO/CEN) to write the actual technical standards. AI Impact: Pushes for harmonized AI standards across the continent.
Accountability & Liability	Calls for a review of the "safety and liability legal framework" to handle autonomous AI actions. Discusses "traceability" and "human oversight" as mechanisms for accountability.	Coverage: Legal responsibility. Strengths: Identifies the gap in existing laws regarding "autonomous" damage. Weaknesses: The specific liability directive is separate and complex. AI Impact: Prepares the ground for the "AI Liability Directive."
Sustainability	"AI is a critical enabler for attaining the goals of the Green Deal". Focus on energy efficiency and solving environmental challenges.	Coverage: Environmental impact. Strengths: Positions AI as a solution to climate change. Weaknesses: Less focus on the carbon footprint of training these models. AI Impact: Encourages "Green AI" research.





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:	D40: National Programme to Promote the Development and Use of Artificial Intelligence in the Republic of Slovenia by 2025	
	Finding	Details Focused on AI/GenAI
Gaps:	Lacks specific pedagogical guidelines for Higher Education usage; primarily focuses on R&D, industry transfer, and public sector adoption.	Major GenAI Gap: The strategy focuses on "predictive" and "analytical" AI. It completely misses the implications of Generative AI (LLMs) on assessment, copyright, and creative work.
	Heavily overlaps with E8 (EU White Paper), adopting the exact "Ecosystem of Excellence" and "Ecosystem of Trust" terminology.	AI Alignment: Adopts the EU definition of AI as "software" requiring "human oversight," ensuring that Slovenian national strategy is interoperable with EU AI Act definitions.
Overlaps	The strategic goal to be a "reference country for AI" contrasts with D42, which identifies significant infrastructure and skill gaps in the education system.	Tech Mismatch: Promotes high-level "Language Technologies" (Slovene LLMs) development, but does not reconcile this with the lack of computing power available to universities to actually train such models.
	Lacks specific pedagogical guidelines for Higher Education usage; primarily focuses on R&D, industry transfer, and public sector adoption.	Major GenAI Gap: The strategy focuses on "predictive" and "analytical" AI. It completely misses the implications of Generative AI (LLMs) on assessment, copyright, and creative work.
Inconsistencies	Timetable Feasibility: The strategy sets ambitious adoption targets for 2025 (e.g., pervasive AI in public administration) which contradict the slow pace of legislative updates and procurement cycles noted in later reports.	Pacing Mismatch: The document envisions rapid, agile AI deployment in government, yet relies on traditional, slow-moving bureaucratic procurement processes that struggle to keep up with the weekly update cycles of GenAI models.

Doc ID:	D41: Development project - Use of generative artificial intelligence for and in education	
	Finding	Details Focused on AI/GenAI
Gaps:	Provides funding for "digital forms of teaching" but lacks technical standards or interoperability requirements for the tools developed.	No Tool Specification: Does not distinguish between "traditional digital tools" (LMS, Moodle) and "AI tools" (adaptive learning, chatbots). This allows projects to claim "digital" status without actually implementing advanced AI.
	The "Twin Transition" (Green + Digital) theme is a direct overlap with D40 and E8.	AI for Green: Encourages the use of digital tools to reduce carbon footprints (e.g., remote learning), implicitly supporting AI optimization, though not explicitly GenAI.





Overlaps	Promotes "Open Education" (OER), yet pilot projects often rely on proprietary commercial software.	Proprietary vs. Open: Funding rules favor open results, but most viable GenAI tools (OpenAI, Anthropic) are closed/paid ecosystems, creating a conflict for grant beneficiaries.
	Provides funding for "digital forms of teaching" but lacks technical standards or interoperability requirements for the tools developed.	No Tool Specification: Does not distinguish between "traditional digital tools" (LMS, Moodle) and "AI tools" (adaptive learning, chatbots). This allows projects to claim "digital" status without actually implementing advanced AI.
Inconsistencies	Sustainability vs. Compute Intensity: The call mandates "Green Transition" goals but simultaneously funds data-intensive "Digital Transition" projects without acknowledging the high energy cost of training/running the AI models required for those projects.	Green AI Paradox: Funds are awarded for "green" results, but the "digital" means to achieve them (e.g., large-scale AI pilots) may inherently increase the institution's carbon footprint, a conflict not addressed in the tender criteria.

Doc ID:	D42: UI v izobraževanju na UL / Smernice za uporabo orodij (generativne) umetne inteligence v izobraževanju (z PDF)	
	Finding	Details Focused on AI/GenAI
Gaps:	Acts as a status report/methodology but lacks binding regulatory power or a budget for implementation. Identifies problems without mandating solutions.	Practical Usage Gap: Discusses "AI Literacy" but does not provide a concrete curriculum for teaching GenAI prompting or ethics to students, leaving it to individual teacher initiative.
	Repeats the "DigComp" and "DigCompEdu" competency frameworks referenced in D41 .	Standardized Competencies: Aligns with the EU view that "AI usage" is now a core digital skill, moving beyond basic computer literacy to include "interaction with AI systems".
Overlaps	Notes a discrepancy between the high availability of digital equipment and the low pedagogical usage by teachers.	Readiness Paradox: Highlights that while hardware exists, the pedagogical model for integrating GenAI (e.g., personalized tutoring) is missing, leading to "tech-rich but AI-poor" classrooms.
	Acts as a status report/methodology but lacks binding regulatory power or a budget for implementation. Identifies problems without mandating solutions.	Practical Usage Gap: Discusses "AI Literacy" but does not provide a concrete curriculum for teaching GenAI prompting or ethics to students, leaving it to individual teacher initiative.
Inconsistencies	Assessment vs. Policy: The report identifies that "standardized testing" is a barrier to personalized AI learning, yet the national education system continues to enforce rigid standardized assessments that penalize the variability inherent in AI-assisted learning.	Rigidity vs. Fluidity: Calls for flexible, personalized learning paths enabled by AI, but operates within a highly regulated national accreditation system that requires fixed, uniform learning outcomes for all students.

Doc ID:	D43: Umetna inteligenca v izobraževanju in raziskovanju: Izzivi, etična vprašanja in smernice / Artificial Intelligence in Education and Research: Challenges, Ethical Issues, and Guidelines	
	Finding	Details Focused on AI/GenAI
Gaps:	Does not specify which AI detection tools should be used, leaving verification up to individual teachers.	Detection Vacuum: Acknowledges that GenAI text is hard to detect but offers no standard "University-approved" detector, creating a risk





		of false accusations against students.
	The definition of "academic integrity" and "citation" strongly overlaps with D44 .	Citation Consensus: Aligns with D44 on the requirement to cite AI as a "tool" rather than an "author," standardizing the academic approach to non-human contributors.
Overlaps	Encourages AI use for learning but strictly enforces "authorship" rules.	The "Co-pilot" Conflict: Tells students to use GenAI to "improve" work but forbids them from letting it "write" the work. The boundary between "heavy editing by AI" and "writing by AI" is technically blurred and hard to police.
	Does not specify which AI detection tools should be used, leaving verification up to individual teachers.	Detection Vacuum: Acknowledges that GenAI text is hard to detect but offers no standard "University-approved" detector, creating a risk of false accusations against students.
Inconsistencies	Staff vs. Student Rules: Imposes strict citation and "transparency" requirements on students for coursework, but lacks equivalent explicit clauses mandating that faculty disclose their own use of AI in grading, lesson planning, or writing grant applications.	Asymmetric Transparency: Students must "show their work" regarding AI, but there is no reciprocal requirement for professors to declare if they used ChatGPT to generate exam questions or feedback, creating a double standard.

Doc ID:	D44: Smernice glede uporabe generativne umetne inteligence v pedagoškem procesu in pri raziskovalnem delu na UM EPF / Guidelines on the use of generative artificial intelligence in the pedagogical process and in research work at UM EPF	
	Finding	Details Focused on AI/GenAI
Gaps:	The list of "prohibited" uses (e.g., generating text) lacks technical enforcement mechanisms.	Prompt Policing: Prohibits "generating text" but allows "language correction." In GenAI (LLMs), these are the same underlying process (token prediction), making the rule technically ambiguous.
	Citations of GDPR and data privacy overlap with D40 and E8 .	Data Leaks: Explicitly operationalizes the GDPR concern by forbidding the input of personal data into public GenAI prompts (e.g., ChatGPT), directly addressing the "training data" risk.
Overlaps	Distinguishes between "language correction" (permitted) and "text generation" (prohibited).	Functionality Blur: Acknowledges AI can be used for "improving style," but if a student uses a "Rewrite this paragraph" prompt, it is unclear if that falls under "correction" or "generation".
	The list of "prohibited" uses (e.g., generating text) lacks technical enforcement mechanisms.	Prompt Policing: Prohibits "generating text" but allows "language correction." In GenAI (LLMs), these are the same underlying process (token prediction), making the rule technically ambiguous.
Inconsistencies	Tool Classification vs. Reality: Attempts to categorize tools into "Permitted" and "Prohibited" based on function, which contradicts the reality of "General Purpose AI" (like ChatGPT) where a single tool performs both permitted (editing) and prohibited (generating) functions simultaneously.	The "Super-App" Problem: The policy assumes a world of distinct tools (a spellchecker vs. a writer), but GenAI is a single interface that does both. Banning the "function" while permitting the "tool" creates an unenforceable regulatory loop.

Doc ID:	D45: Stališča Univerze na Primorskem do rabe umetne inteligence / Positions
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of the University of Primorska on the use of Artificial Intelligence		
	Finding	Details Focused on AI/GenAI
Gaps:	High-level position paper; lacks the granular "permissible vs. prohibited" tool lists found in D44 .	Operational Void: establishes a philosophy ("AI is a tool") but lacks specific instructions for students on how to cite a GenAI conversation in a thesis bibliography.
	The "Human in the loop" philosophy aligns perfectly with E8 (Human oversight).	Human Centricity: Reaffirms the EU White Paper's stance that AI decisions (or outputs) must be verifiable by humans, rejecting "black box" acceptance of GenAI answers.
Overlaps	Affirms AI is a "tool" to be used, but implies reliance on it diminishes "human intellectual work."	Mixed Messaging: Sends a dual signal: "Use this technology to be competitive" vs. "Using this technology makes you less of a critical thinker," potentially confusing students about institutional expectations.
	High-level position paper; lacks the granular "permissible vs. prohibited" tool lists found in D44 .	Operational Void: establishes a philosophy ("AI is a tool") but lacks specific instructions for students on how to cite a GenAI conversation in a thesis bibliography.
Inconsistencies	Critical Thinking vs. Tool Dependency: Argues that AI should strictly be a "support tool" that does not replace intellect, yet acknowledges that future professional environments will require fluency in AI delegation, creating a tension between "academic purity" and "job market readiness".	Skill Conflict: The university wants to preserve "independent thought" (doing it without AI), while the market demands "integrated thought" (doing it efficiently with AI). The policy struggles to balance these opposing educational goals.

Doc ID: E8: On Artificial Intelligence - A European approach to excellence and trust		
	Finding	Details Focused on AI/GenAI
Gaps:	Written in 2020, focuses on "predictive" AI and "high-risk" sectors. Completely gaps on Generative AI (ChatGPT).	The "Generative" Blindspot: The risk framework focuses on physical safety (robots) and discrimination (decisions). It does not anticipate the massive copyright, hallucination, and plagiarism issues specific to Large Language Models (LLMs).
	Serves as the foundational text for D40 (National Strategy).	Trust Foundation: Establishes the "Trustworthy AI" vocabulary (Lawful, Ethical, Robust) that permeates all subsequent Slovenian documents, even if they apply it to GenAI later.
Overlaps	Promotes an "Ecosystem of Trust" based on strict rules, while acknowledging "opacity."	Black Box Dilemma: Demands "Traceability" and "Explainability" for AI, which is inherently difficult for the Deep Learning / Transformer models that power modern GenAI, creating a regulatory tension.
	Written in 2020, focuses on "predictive" AI and "high-risk" sectors. Completely gaps on Generative AI (ChatGPT).	The "Generative" Blindspot: The risk framework focuses on physical safety (robots) and discrimination (decisions). It does not anticipate the massive copyright, hallucination, and plagiarism issues specific to Large Language Models (LLMs).
Inconsistencies	Innovation vs. Regulation: States a primary goal of promoting European AI "Excellence" and leadership, yet proposes a "heavy" regulatory compliance burden (testing, certification) that may stifle the very startups needed to achieve that excellence.	The Compliance Barrier: Aims to create "European AI champions" to compete with the US/China, but the proposed regulatory friction (mandatory conformity assessments) effectively advantages large incumbents over the agile SMEs it claims to support.





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
R1	Over-reliance & Deskilling: Students or staff relying on AI to the point of losing critical thinking, writing, or problem-solving skills. The "automation bias" where humans accept AI output without scrutiny.	High	Loss of core academic competencies; degrees lose value if graduates cannot work independently.	D45, D42, E8	D45: Explicitly states AI must not replace human intellectual work; emphasizes "critical evaluation" as a core competency. E8: Mandates "Human Oversight" to prevent automation bias.
R2	Data Leakage (GDPR Violation): Users entering sensitive research data, exam questions, or personal student information into public, commercial AI models (e.g., ChatGPT, Claude) to train them.	High	Violation of GDPR; loss of Intellectual Property (IP); breach of research ethics.	D40, D44, E8	D44: Strict prohibition: "Do not enter personal, sensitive, or confidential data into AI tools." D40: Reaffirms strict adherence to national data protection laws.
R3	Hallucination & Misinformation: AI generating false citations, incorrect scientific facts, or biased historical narratives that are accepted as truth by students/researchers.	Medium	Academic fraud; spread of misinformation in scientific literature.	D43, D44	D43: Assigns full responsibility for accuracy to the human author. D44: Mandates that students must verify all references and are liable for "hallucinated" sources.
R4	Inequity of Access (The "Paywall" Gap): Students with paid subscriptions to advanced models (e.g., GPT-4o) having a significant performance advantage over those using free/legacy versions.	Medium	Unfair assessment conditions; widening of the socio-economic digital divide.	D41, D42, E8	D41: Funds pilot projects explicitly targeting "inclusion" and digital equity. D42: Identifies the hardware/software gap but offers limited immediate mitigation beyond "monitoring."
R5	Undefined Assessment Rules: Ambiguity in what constitutes "unauthorized aid" in specific courses, leading to inconsistent grading or false accusations of cheating.	Medium	Disciplinary disputes; student anxiety; legal challenges to exam results.	D43, D44	D44: Requires course leaders to define permissible tools before the assignment begins. D43: Calls for "transparent citation" as the primary defense against accusations.



R6	Black Box Opacity: The inability to explain how an AI reached a conclusion, making it difficult to challenge automated grades or decisions.	High	Violation of the "Right to Explanation" (under EU law); lack of trust.	D40, E8	E8: Proposes strict "Transparency" and "Information Provision" obligations for high-risk AI. D40: Promotes research into "Explainable AI" (XAI).
R7	Regulatory Obsolescence: Strategic documents (written in 2021) focusing on "predictive" AI and missing the specific risks of "Generative" AI, leaving institutions without high-level guidance.	Low	National strategy becomes irrelevant; institutions must create ad-hoc rules without state support.	D40 vs. D43/44	D43: Establishes a "Standing Working Group" to update guidelines continuously, acknowledging that static policy is insufficient.

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?	High Translation of Concepts. The influence of E8 (EU White Paper) is direct: its "Ecosystem of Trust" framework is copied verbatim into the National Strategy (D40). EU "DigCompEdu" frameworks are the basis for national education reports (D42) and funding calls (D41). At the university level, strict GDPR compliance (an EU regulation) is the primary driver for the "Data Privacy" rules found in D44 and D43 , specifically regarding the prohibition of uploading personal data to US-based clouds.	
Extent of Implementation	Was implementation partial or full? Provide brief reasoning and examples.	Partial / Pilot Phase. While the strategic framework is fully adopted (D40), the operational implementation is still in the "Pilot" stage. D41 funds experimental projects rather than systemic rollout. D42 explicitly notes a gap between the "availability of technology" (Full) and the "pedagogical readiness" of teachers (Partial). Institutional guidelines (D43 , D44 , D45) are fully implemented as policy, but technical enforcement (e.g., standard detection tools) remains unimplemented due to technological limitations.	
Institutional Adoption of AI Regulations	How has your institution implemented or enforced AI-related guidelines (e.g., academic policies, staff guidance, committees)?	Rapid "Soft Law" Adoption. All three major universities have bypassed slow statute changes in favor of agile Guidelines (D43 , D44) and Senate Positions (D45). Enforcement is integrated into existing Academic Integrity structures: D44 requires students to sign declarations of honest use, and D43 mandates specific citation formats. Governance is dynamic; D43 establishes a "Standing Working Group" to continuously update these rules as the technology evolves.	





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.

General comments on the policy landscape in your country/institution:

The Slovenian policy landscape is characterized by a distinct "speed gap" between national strategy and institutional reality. At the top level, the **National Programme (D40)** and the **EU White Paper (E8)** provide a robust, values-based framework ("Trustworthy AI"), but they predate the Generative AI boom and thus lack specific guidance on LLMs. In response, Higher Education Institutions have acted faster than the state, filling the regulatory void with "bottom-up" guidelines (**D43, D44, D45**).

A key strength is the **consensus on Human-Centricity**: from the EU level (**E8**) down to individual university faculties (**D43, D45**), there is total agreement that humans retain full liability and that AI is a "co-pilot," not an author. However, a significant weakness identified in **D42** and **D41** is the "implementation gap": while hardware and high-level strategies exist, the *pedagogical methodology* for teaching with (and assessing) AI is still in its infancy. We are currently in a transition phase where rules prohibit "generating text" (**D44**), but the tools to enforce these rules (detection software) are technically unreliable, creating a reliance on honor codes over structural checks.

Initial recommendations for what should be considered in the Policy Analysis Report:

1. **Update National Strategy for Generative AI:** The National Programme (**D40**), written in 2021, focuses on "predictive" AI. It must be updated to address the specific legal and educational challenges of **Generative AI** (copyright, hallucinations, assessment security) to provide a unified umbrella for university policies.
2. **Harmonize "Unauthorized Assistance" Definitions:** Currently, institutions vary slightly in their definitions—e.g., **D44** distinguishes between "correction" and "generation," while **D43** focuses on "transparency." A national definition of "AI-assisted plagiarism" would prevent students from facing different integrity standards across the Slovenian Higher Education Area.
3. **Shift Funding from "Digital" to "Pedagogical":** As noted in **D41** and **D42**, funding often targets "digital transition" (infrastructure). Future funding should prioritize **Assessment Reform** (training teachers to design AI-proof assignments like oral defenses) rather than just buying more technology.
4. **Operationalize the "Green AI" Link:** While **D40** and **D41** mention the "Twin Transition" (Green + Digital), there is no concrete guidance on the environmental impact of AI models. Universities should be encouraged to consider the "carbon cost" of the AI tools they procure or build.





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).

