Erasmus+ EthicAI Project

Institutional Cases of Generative AI in European Education

Partner Responses Mapped at the Macro, Meso and Micro Levels



Work Package 2 · Task 2.2 — Prepared by Anadolu University

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01 Overview

This report reads the responses of the ETHICAI partners to the Task 2.2 call. The partners were asked which reports, models and practices shape the use of generative AI at the national, institutional and classroom levels in their countries. The responses were divided into entries, coded in two cycles, linked to themes and compared with the ADMIT synthesis.

Responses: 7
Entries: 70
Codes and categories: 30 · 6
Themes: 5
Verified quotations: 96

Table 1. The responses

Country	Institution	Scope	Macro	Meso	Micro
Greece	Institute of Educational Policy (IEP)	School education	3	3	5
Cyprus	Open University of Cyprus (OUC)	Higher education and school education	5	4	2
Portugal	Universidade Aberta (UAb)	Higher education	2	13	1
Netherlands	Open Universiteit (OUNL)	Higher education	1	1	1
Italy	International Telematic University UNINETTUNO	Higher education	3	1	2
Belgium	KU Leuven	Higher education	1	7	4
Türkiye	Anadolu University, Open Education Faculty	Higher education (open and distance learning)	3	5	3

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02 Summary

This report maps the reports, models and practices that the ETHICAI partners named when asked what shapes the use of generative artificial intelligence at the national, institutional and classroom levels in their countries. Six partner institutions from Greece, Cyprus, Portugal, the Netherlands, Italy and Belgium answered a structured call, and the task lead compiled a seventh answer for Anadolu University Open Education Faculty from documented sources. The seven responses were divided into 70 entries, each tied to the sentence in the response or source on which it rests, and coded in two cycles into 30 codes, six categories and five themes. Nearly half of the entries sit at the institutional level, and the three levels do different work. National texts are strategies, laws and advisory frames; binding rules appear at the institutional level and nowhere below it; and fourteen of the eighteen classroom entries concern the capacities of teachers and students rather than control of use. Disclosure of use and the redesign of assessment form the common vocabulary of institutional rules, although half of that vocabulary comes from the Portuguese response. Tools enter classrooms mainly as tutors and pilots whose implementation the respondents themselves describe as incomplete. The middle level is filled unevenly: by national agencies in one response, by twelve institutional documents in another, by the policies of six universities in a third and by nothing in a fourth. The distribution resembles the one found across the ADMIT reports, which suggests that the relative thinness of the classroom level reflects what institutions document rather than what they do.

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03 Scope and method

The call and the responses

Partners received a form asking for reports, models or practices at three levels, each with a link and a short explanation: the macro level of national policy, the meso level of institutional governance and the micro level of classroom and learning design. Six partner institutions answered between 15 and 25 September 2026. One response arrived twice with identical content and is counted once, and one ends mid-sentence in its institutional section, so only the part received was recorded. The Belgian partner, KU Leuven, sent ten separate submissions on 25 September, each naming one source; they are read together as one response. The answers differ in scope as well as in length: the Greek response concerns school education, the Cypriot response covers both school and higher education, and the others concern higher education. The Belgian response also names institutions other than KU Leuven, one of them TU Delft in the Netherlands; these entries stay with the response that named them.

Anadolu University Open Education Faculty, as task lead, did not answer the call in the same way. Its answer was compiled against the same three questions from sources already verified in the ADMIT synthesis, from the faculty's two published guides and programme page, and from two manuscripts by members of the faculty. The answer is marked as compiled throughout, and its entries rest on those sources; it was entered into the form afterwards so that the record of responses is complete.

Unit of analysis

Each item a respondent listed became one entry. An item was recognised by its own title, link or bullet; where a sentence named two instruments, the two became separate entries, and where several publications were listed under one heading, they formed one entry. Every entry carries at least one verbatim quotation from the response or source, and a script searched each quotation in its source before the report was compiled. All 96 quotations were located. An entry keeps the level at which the respondent placed it, even where another reading would be possible, because the placement itself is part of what the responses show.

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Coding and theming

Coding followed two cycles (Saldaña, 2021). In the first cycle, descriptive codes recorded what each entry does and which principles it invokes; in the second, pattern coding grouped the 30 codes into six categories: the form of the instrument, capacity building, integrity and accountability, values and protections, provision of tools and infrastructure, and reported absence. The 199 code assignments were then read across levels and responses, and five themes were built from the patterns that held across more than one response (Braun & Clarke, 2006). Each theme is defined by the codes that carry it, so an entry belongs to a theme when it carries one of the theme's codes and may belong to several; the codes of values and protections cut across the themes and define none of them. A code counts once per entry, so a frequency is the number of entries that carry the code.

Word statistics

The word statistics use the partners' own wording: the text of each form cell for the six partners, and the entry summaries for the compiled Anadolu answer. Function words, links, the names of countries and institutions, and the words present in every answer (such as artificial intelligence and generative) were removed, and established terms such as academic integrity were counted as one unit. Reference lists pasted into a response were left out, since they carry authors' names and titles in other languages rather than the respondent's own account. Keywords for each level were identified by log-likelihood against the other two levels (Dunning, 1993), keeping only words more frequent than expected and above the threshold of 3.84. Co-occurring codes were weighed by the Jaccard coefficient, which prevents frequent codes from appearing to accompany everything (Jaccard, 1912).

Limits

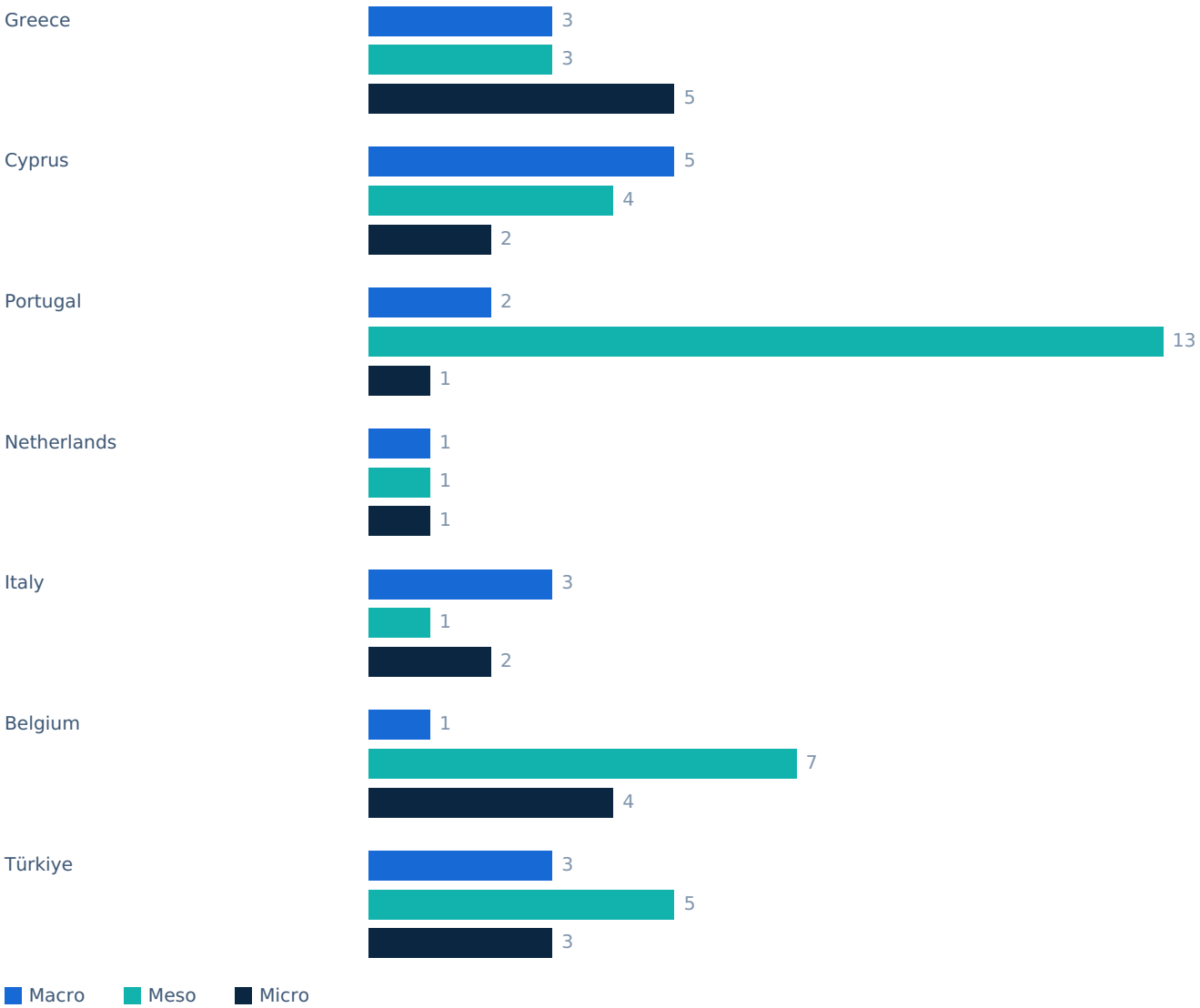
Seven responses cannot represent seven systems, and the numbers in this report describe what the respondents chose to name. Most respondents are open and distance teaching institutions, and campus-based universities enter the set mainly through the Belgian response. Response length varies widely, from seven counted words in one response to more than two hundred and fifty in another, and the longest institutional list comes from a single country. Frequencies are therefore read as the weight of a pattern in these answers, and no test of difference between countries is attempted.

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04 Profile of the responses

The seven responses yield 70 entries: 18 at the macro level, 34 at the meso level and 18 at the micro level. The responses are unequal in size. The Portuguese response alone contributes 16 entries, thirteen of them at the institutional level, which is more than a third of all meso entries; the Belgian response follows with 12, seven of them institutional; the Dutch response contributes three, two of which report that nothing exists. The Greek response is the only one in which the micro level holds the largest share.

Figure 1. Entries by response and level

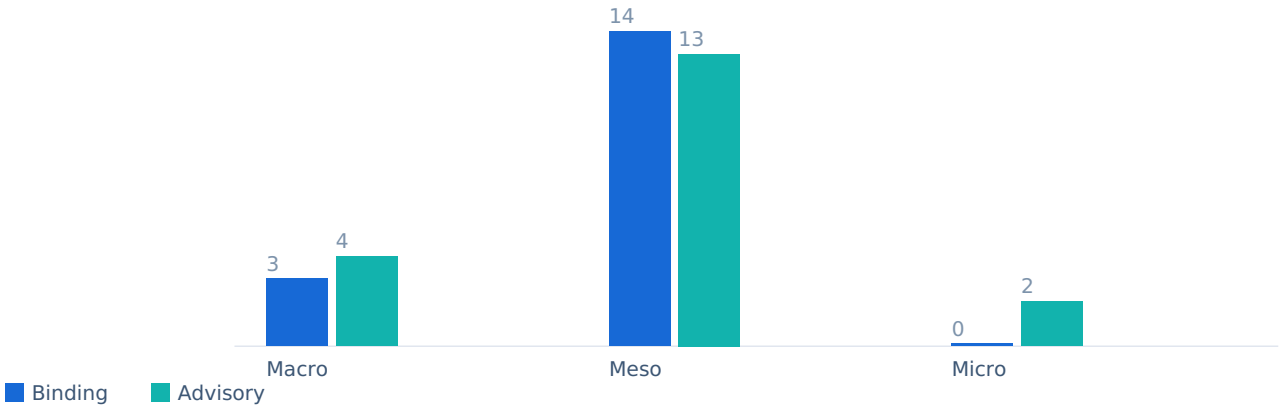


Each bar is one response, divided by the level at which the respondent placed each entry. The Portuguese response is the largest and is concentrated at the institutional level, followed by the Belgian response, while the Greek response is the only one weighted towards the classroom. The Dutch bar is short because two of its three entries report that nothing exists, which is itself a finding rather than a gap in the data.

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What an entry is also differs by level. Binding instruments appear at two levels only: three laws or ministerial decisions at the macro level and fourteen institutional policies or regulations at the meso level. Advisory texts gather in the same two places, four at the macro level and thirteen at the meso level, and two advisory texts reach the micro level. No entry at the classroom level is a binding rule.

Figure 2. Binding and advisory instruments by level



Binding instruments are laws, ministerial decisions and formally adopted institutional policies or regulations; advisory instruments are guidelines and recommendations without binding force. Both gather at the institutional level, and the classroom level holds two advisory texts and no binding rule. An entry can carry neither code when it is a training programme, a tool or a body rather than a text.

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05 Qualitative reading of the categories

The second coding cycle grouped the codes into six categories. Each category is read below through what the respondents wrote, with entries that show the category at its clearest. The quotations are the respondents' own words and appear as they were submitted.

Form of the instrument

The first category records what kind of thing a respondent named. Strategies, laws and advisory frames make up the national layer, while institutional policies make up the layer below: all eight strategies and all three laws are macro entries, and all fourteen institutional policies are meso entries. Advisory guidance is the second most frequent code in the set and appears at all three levels, mostly at the institutional one. The respondents often qualify the status of an instrument themselves, calling it advisory, binding, under consultation or not yet complete, which shows that the form of an instrument matters to them as much as its content.

> The plan fully aligns with the European AI Act and focuses on the holistic integration of AI at all levels of education through specific actions.
>
> Greece · Macro · Blueprint for Greece's transition to the age of AI (Partner response form, row 2)

> Formal faculty regulations containing provisions on AI in teaching and assessment, including pedagogical use and equitable access.
>
> Portugal · Meso · Teaching and assessment regulations with provisions on AI (Partner response form, row 4)

> advisory upgraded Cyprus national strategy on AI until 2032 placed under public consultation by the 31st of August 2026
>
> Cyprus · Macro · National AI strategy to 2032 under public consultation (Partner response form, row 3)

Capacity building

Capacity building is the category of the classroom. Professional development appears in fourteen entries, five of them Greek and four Belgian, and AI literacy in eleven, spread across students, staff and the public. The programmes differ in depth, from an accredited certification to a single online seminar, but they share an orientation: the teacher is addressed as a designer of material and activity. Curriculum appears twice, once as a degree built around AI-assisted coding and once as a pedagogical model that writes AI into every programme.

> incorporating AI elements into Technological Pedagogical Content Knowledge (TPACK).
>
> Greece · Micro · Sub8 short professional development on AI and TPACK (Partner response form, row 2)

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> Separate guides were published for students and for academic staff, and modules on literacy and on prompt and context engineering were opened.
>
> Türkiye · Micro · Modules on AI literacy and on prompt and context engineering (Öncü & Bozkurt (2026a))

> Also highlight the existing new pedagogical model of UAb that integrates AI in the curriculum and practices.
>
> Portugal · Meso · Pedagogical model integrating AI in the curriculum (Partner response form, row 4)

Integrity and accountability

This category collects the mechanisms that make use visible. Assessment design appears in nine entries, academic integrity in six and disclosure in five, and all six integrity codes are institutional. The mechanisms differ in how far they reach into practice: a signed declaration records that use occurred, interaction records show how it occurred, and a framework of permitted-use regimes decides in advance where it may occur. The Portuguese texts carry almost half of this category, and their range, from principles to regimes, is itself a finding about how assessment rules mature.

> binding declaration of GenAI use for students aiming in using GenAI with responsibility during their studies
>
> Cyprus · Meso · Binding declaration of generative AI use for students (Partner response form, row 3)

> addresses permitted uses, disclosure of AI assistance, interaction records and assessment design.
>
> Portugal · Meso · Guidelines for the use of AI tools in academic work (Partner response form, row 4)

> Institutional framework for AI-aware assessment, defining permitted-use regimes and guidance for assessment redesign, academic integrity, transparency, and credible evidence of student learning.
>
> Portugal · Meso · Framework for assessment in the age of AI (Partner response form, row 4)

Values and protections

Values are spread across the whole set. Ethical and responsible use is named in twenty-one entries from six countries, critical thinking and verification in ten, data protection in nine and equity in four. The Belgian response alone accounts for six of the ethical entries, from a regional vision on responsible AI to a student council position. The values take a practical form in the classroom entries, where students are asked to cross-check results, keep personal data out of prompts and verify the sources a system gives them. At the national and institutional levels the same values appear as principles, most often transparency named together with human oversight.

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> seminars/workshops organized by OUC for staff, students and the general public on generative AI & LLMs promoting good practices in using LLMs (protection of personal data, objective non-directed prompts, targeted prompts, cross-checking of results etc)
>
> Cyprus · Meso · Seminars for staff, students and the public on generative AI (Partner response form, row 3)

> Socrates AI is integrated into the digital learning environment of Università UNINETTUNO as a Generative AI-based learning support system.
>
> Italy · Micro · Socrates AI: dialogic generative AI for critical and personalised learning (Partner response form, row 6)

> Institutional framework based on responsibility, transparency, inclusion, equity and human oversight.
>
> Portugal · Meso · Recommendations on AI in teaching, learning and assessment (Partner response form, row 4)

Provision of tools and infrastructure

Provision is the least frequent of the substantive categories and the one described with the most qualification. Six entries supply a tool, four concern infrastructure and three describe personalised tutoring, and the Belgian response contributes none of them. Almost every provision entry carries a condition: a pilot, a limited adoption, an implementation not yet complete or a partnership with a commercial provider. National infrastructure appears where language is at stake, in the Pharos-CY antenna for Greek-language AI.

> including in the Computer Science degree, where it supports students as a personal tutor. However, adoption remains limited.
>
> Portugal · Micro · AI personal tutor in the Computer Science degree (Partner response form, row 4)

> aimed at empowering educators to make effective and responsible use of GenAI tools, including the ChatGPT Edu platform, in developing instructional materials.
>
> Greece · Micro · AI in Schools pilot with ChatGPT Edu (Partner response form, row 2)

> targets at providing infrastructure, data, and AI tools for the greek language
>
> Cyprus · Macro · Pharos-CY AI factory antenna for the Greek language (Partner response form, row 3)

Reported absence

Two entries report that nothing exists, both from the same response and both below the national level. The absence is stated plainly and without qualification. It is kept as a category of its own because an explicit absence is information: it tells the reader that the question was asked and answered, which a missing entry does not.

> No institutional governance existing at OUNL currently
>
> Netherlands · Meso · No institutional governance in place (Partner response form, row 5)

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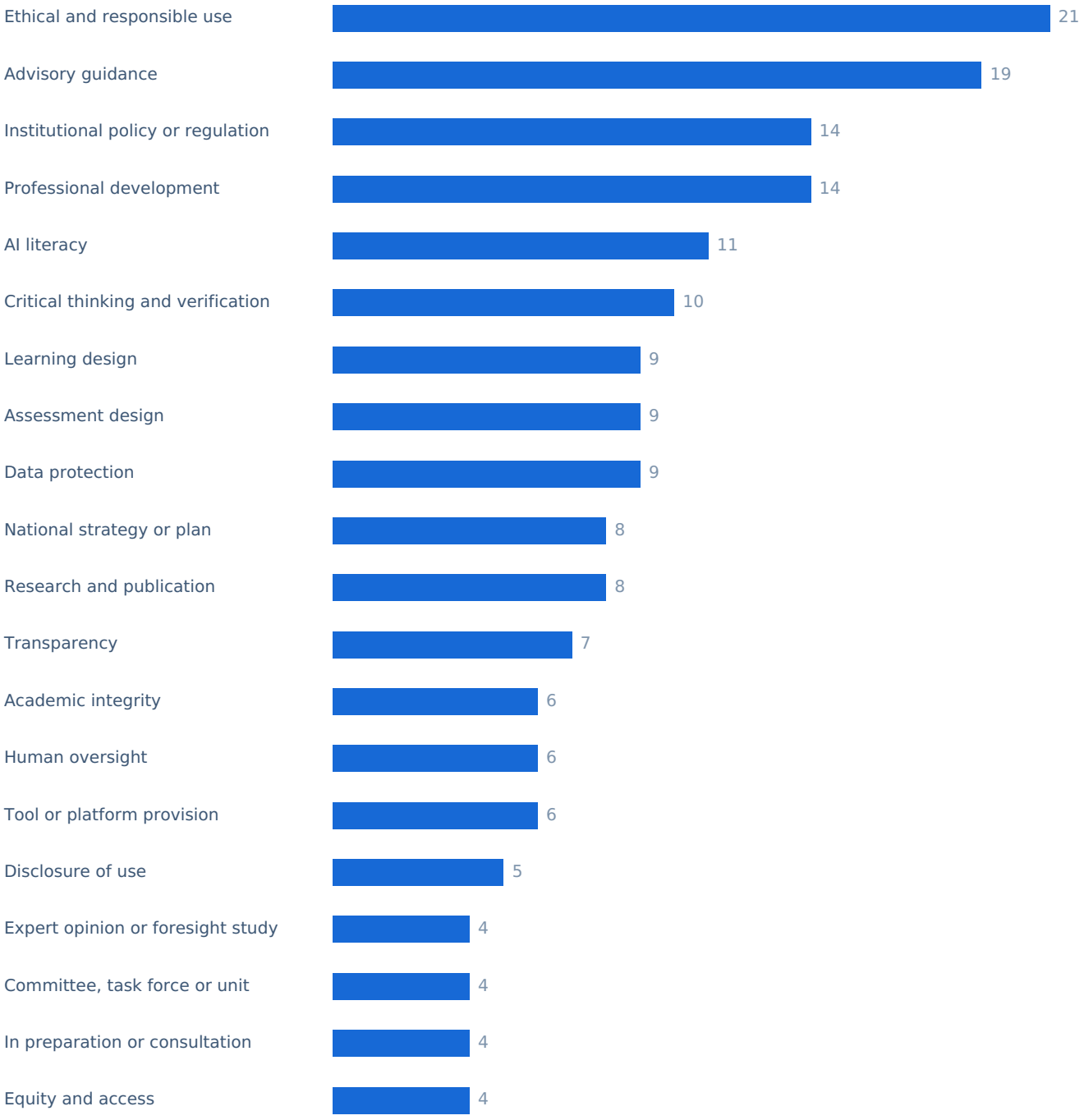
06 Codes and categories

The most frequent codes

Ethical and responsible use is the most frequent code, carried by 21 entries, followed by advisory guidance with 19. Professional development and institutional policy each appear in 14 entries, AI literacy in 11 and critical thinking and verification in 10. The list is led by the values the texts invoke and the form they take, and the first code on the provision of tools, with six entries, comes after twelve others.

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Figure 3. Code frequencies (the twenty most frequent codes)



Bars show the number of entries carrying each code. The leading codes describe the values the instruments invoke and the form they take rather than the provision of tools. The twenty most frequent codes are drawn on paper; the full set is given in the codebook in the general table.

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Categories across levels

Each category has a level where it gathers. The form of the instrument dominates the macro level, where 15 of 18 entries carry it. Integrity and accountability gather at the meso level with 15 of 34 entries. Capacity building gathers at the micro level, where 14 of 18 entries carry it, and provision of tools is the only other category that reaches its highest share there. Several codes live at a single level: all eight national strategies are macro, all fourteen institutional policies and all six academic integrity codes are meso.

Figure 4. Categories across levels

Category	Macro (n=18)	Meso (n=34)	Micro (n=18)
Form of the instrument	83% (15)	91% (31)	17% (3)
Capacity building	22% (4)	24% (8)	78% (14)
Integrity and accountability	28% (5)	44% (15)	22% (4)
Values and protections	44% (8)	62% (21)	39% (7)
Provision of tools and infrastructure	11% (2)	9% (3)	33% (6)
Reported absence	0% (0)	3% (1)	6% (1)

Each cell gives the share of entries at a level that carry at least one code from the category. The shares read by column, so the figure shows what each level is made of rather than where a category is largest in absolute terms. The diagonal pattern, from the form of the instrument at the macro level to capacity building at the micro level, is the clearest structure in the set.

Codes that travel together

Some codes rarely appear alone. Transparency and human oversight share four entries and have the strongest association among pairs that share at least two entries, with a Jaccard coefficient of 0.44; they are named together as principles in Portuguese and Italian texts. Academic integrity appears with institutional policy in four entries, and critical thinking accompanies data protection in four, mostly in workshop and guidance texts that tell users to protect personal data and cross-check what the tool returns. The most frequent pairing overall is advisory guidance with ethical and responsible use, in nine entries, because guidance is so often written as a statement of responsible use; advisory guidance with critical thinking follows in six, since guidance often asks for verification. Professional development and AI literacy share six entries, mostly in training programmes for staff.

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Figure 5. Codes that appear together

Code	Code	Shared entries	Jaccard
Ethical and responsible use	Advisory guidance	9	0.29
Professional development	AI literacy	6	0.32
Research and publication	Advisory guidance	6	0.29
Critical thinking and verification	Advisory guidance	6	0.26
Human oversight	Transparency	4	0.44
Critical thinking and verification	Data protection	4	0.27
Academic integrity	Institutional policy or regulation	4	0.25
Assessment design	Advisory guidance	4	0.17
Advisory guidance	Data protection	4	0.17
Research and publication	Ethical and responsible use	4	0.16
Academic integrity	Transparency	3	0.30
Tool or platform provision	Learning design	3	0.25
Critical thinking and verification	Transparency	3	0.21
Disclosure of use	Institutional policy or regulation	3	0.19
Critical thinking and verification	AI literacy	3	0.17
Institutional policy or regulation	Assessment design	3	0.15
Professional development	Learning design	3	0.15
Ethical and responsible use	Expert opinion or foresight study	3	0.14
Human oversight	Advisory guidance	3	0.14
Transparency	Advisory guidance	3	0.13
Ethical and responsible use	Transparency	3	0.12
Institutional policy or regulation	Professional development	3	0.12
AI literacy	Advisory guidance	3	0.11
Professional development	Advisory guidance	3	0.10
Ethical and responsible use	Institutional policy or regulation	3	0.09

Each line joins two codes that share at least three entries; its thickness shows the number of shared entries and its strength the Jaccard coefficient, and both values appear on hover. The coefficient divides shared entries by the entries carrying either code, so a pair of rare codes that always appear together scores higher than a pair of common ones. Among pairs that share at least two entries, transparency and human oversight form the tightest, while advisory guidance connects to the largest number of other codes.

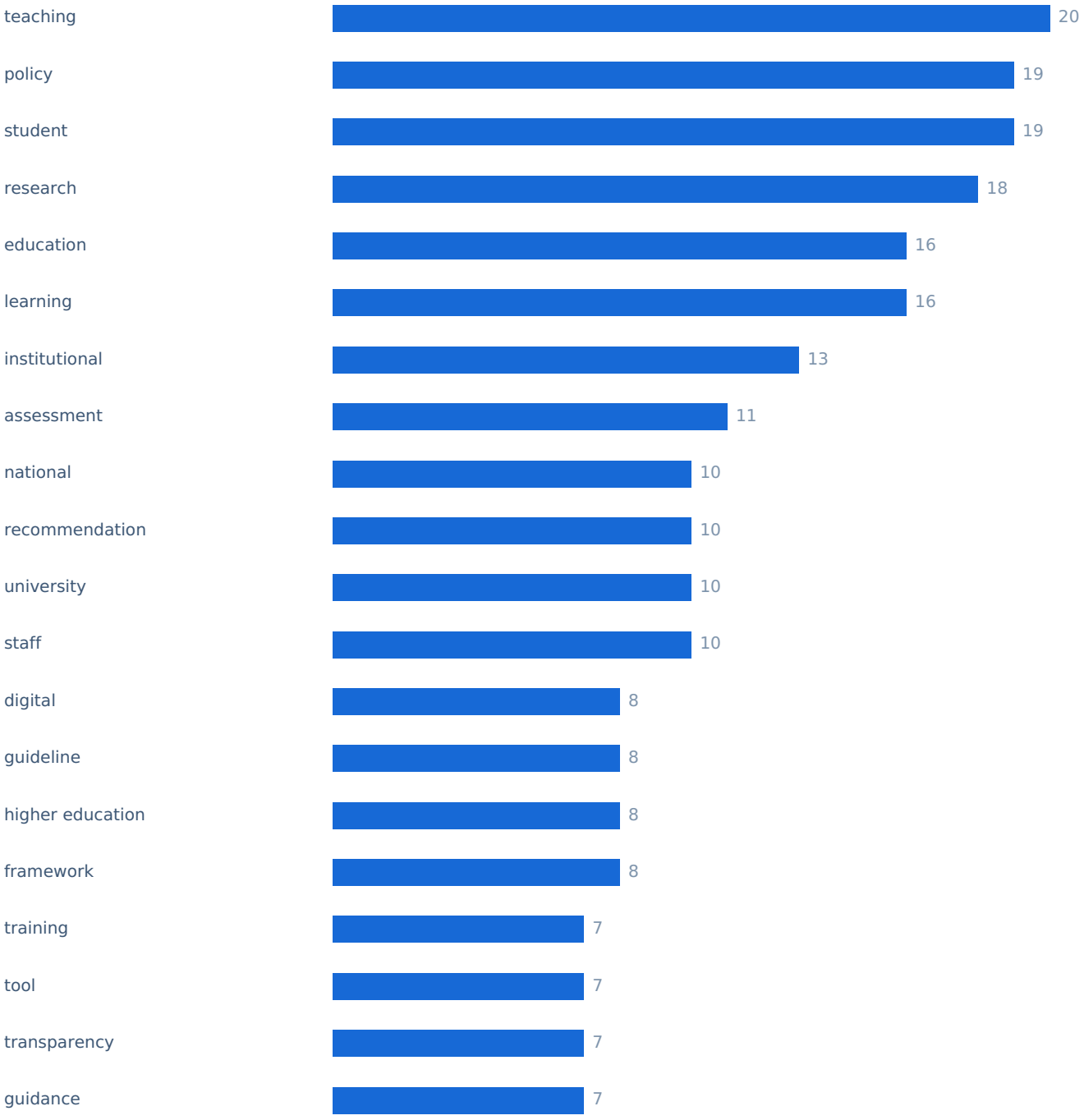
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07 Word cloud and keywords

After cleaning, the responses contain 1,050 counted words. The most frequent are teaching, policy, student and research, followed by education, learning and institutional. The cloud shows a vocabulary of education and governance in which tools and technology hold little space: the word tool appears seven times, fewer than recommendation or framework.

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Figure 6. Word cloud of the responses



Word size is proportional to frequency across all seven responses after function words, links, proper names and pasted reference lists were removed. Established terms such as higher education and academic integrity are counted as single units. Words present in every answer, including artificial intelligence and generative, were removed because they distinguish nothing.

The keywords separate the levels more sharply than the frequencies do. The macro level is marked by higher education, national, strategy and advisory, the vocabulary of frames. The meso level is marked by assessment, whose

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log-likelihood of 16.6 is the highest in the set, and by staff, institutional, responsibility, critical thinking and academic integrity. The micro level is marked by resource, model, material and personalised, the vocabulary of what is placed in front of a learner.

Figure 7. Keywords of each level

Level	Word	n	G^2
Macro	education	12	13.95
Macro	higher education	7	11.67
Macro	national	8	10.82
Macro	strategy	5	7.43
Macro	systems	3	7.28
Macro	advisory	4	5.41
Macro	university	6	3.92
Meso	assessment	11	16.59
Meso	staff	10	15.08
Meso	institutional	11	7.97
Meso	academic	5	7.54
Meso	researcher	5	7.54
Meso	responsibility	5	7.54
Meso	student	14	5.57
Meso	recommendation	8	4.60
Meso	guidance	6	4.58
Meso	critical thinking	3	4.52
Meso	academic integrity	3	4.52
Meso	writing	3	4.52
Micro	resource	5	9.72
Micro	model	5	9.72
Micro	material	3	8.76
Micro	critical	3	8.76
Micro	personalised	3	8.76
Micro	learning	9	8.04
Micro	program	3	4.79
Micro	learning environment	3	4.79
Micro	interaction	3	4.79

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Keywords are words used more often at one level than at the other two, ranked by log-likelihood (G^2). Only words that occur at least three times and exceed 3.84, the value corresponding to $p < .05$ with one degree of freedom, are shown. With a corpus of this size the ranking indicates emphasis rather than a stable difference between levels.

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08 Themes

Five themes were built from the categories. The figure shows how often each theme appears at each level. An entry can belong to several themes, and the readings that follow explain what the counts mean.

Figure 8. Themes across levels

Theme	Macro (n=18)	Meso (n=34)	Micro (n=18)
National frames, institutional rules	14 (78%)	25 (74%)	2 (11%)
Capacity before control	4 (22%)	8 (24%)	14 (78%)
Disclosure and assessment as the institutional grammar	3 (17%)	14 (41%)	2 (11%)
Tools as tutors and pilots	2 (11%)	3 (9%)	6 (33%)
An uneven middle	3 (17%)	7 (21%)	2 (11%)

Each cell gives the number of entries at a level that carry at least one of the theme's codes, and the shading shows that number as a share of the level. An entry can belong to more than one theme, so the columns do not sum to the number of entries. The first theme gathers at the national and institutional levels and the second in the classroom, which is the division of labour the report describes.

National frames, institutional rules

National texts set the direction and leave the rule to someone else. Eight of the eighteen macro entries are strategies or plans, and two of them, in Greece and Italy, are explicitly aligned with the EU AI Act. The Belgian entry at this level is regional rather than national: the Flemish Ministry of Education's vision on responsible AI. Where national law does bind, it binds on data, rights and harm, as in the Greek decision on personal data, the Italian law on transparency and oversight and the Cypriot criminal provision, rather than on teaching. The Turkish response states the consequence directly: without a regulation specific to generative AI in education, the detail is left to universities. Binding rules on use appear accordingly at the institutional level, in fourteen policies and regulations, and not in any national entry.

Capacity before control

At the classroom level the responses describe what people learn and say little about prohibition. Fourteen of the eighteen micro entries carry a capacity code, and eight carry professional development. The Greek response consists at this level entirely of teacher programmes, from a

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certification with AI modules to a short course built on TPACK. The Cypriot workshops, the Anadolu modules on prompt and context engineering and the Belgian examples from the Leuven Learning Lab and the GPT Academy follow the same line. No micro entry is a binding rule. Of the two advisory texts at this level, KU Leuven's five principles state how generative AI should be used, and the Anadolu student guide asks students to verify information against two sources and to decline use where a course does not permit it.

Disclosure and assessment as the institutional grammar

When institutions do write rules, they write them about disclosure and assessment. Integrity and accountability codes appear in 15 of the 34 meso entries: disclosure in four, academic integrity in six and assessment design in seven. The Cypriot binding declaration for students and the Anadolu thesis declaration are the clearest cases, and the Portuguese texts add interaction records and permitted-use regimes for assessment. The weight of this theme rests heavily on one response, since seven of the nine assessment entries are Portuguese. It holds across responses in the narrower form of disclosure, which appears in three countries. The Belgian response enters the theme through research rather than assessment: two of its institutional texts address AI in research, and its only assessment entry is a set of Dutch-language articles on assessment validity.

Tools as tutors and pilots

Tools enter the micro level mainly as tutors and as trials. Five of the six tool entries are micro, and three of them describe personalised tutoring: a tutor in a computer science degree, a dialogic system that asks students to verify its sources, and generative AI inside a learner-centred model. The respondents describe much of this as unfinished. The Portuguese course-specific tutor is not yet complete and adoption remains limited, the Cypriot tools are being piloted, and the Greek classroom tool arrives through a pilot run with a commercial provider. Provision, in these responses, runs ahead of the rules written for it. The Belgian response, built around university policies, has no entry in this theme.

An uneven middle

The meso level holds the most entries and the least agreement about what belongs there. In the Greek response it is filled by national agencies: a policy institute, a bioethics commission and two research centres. In the Portuguese response it is filled by twelve documents from eleven institutions and faculties, and in the Belgian response by the policies and

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guidance of six universities, one of them in the Netherlands, together with a student council position. In the Dutch response it is empty, with no institutional governance and no classroom guidance reported, although the same university reported in 2024 that 96 per cent of its students and 95 per cent of its academic staff used these tools. The Anadolu case shows a further reading: the thesis declaration was decided by an institute rather than the rectorate, so an analysis looking only for a central text would find none. The middle level is where use is decided most often and recorded least consistently.

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09 Reading by level

Macro · national policy

The macro level holds 18 entries from all seven responses. Strategies are the most common form, followed by laws and advisory frames, and two entries describe instruments still in preparation: the Cypriot strategy to 2032 under consultation and the Portuguese ministerial task force expected to report in autumn 2026. National infrastructure appears where language is at stake, as in the Pharos-CY antenna for Greek-language AI. The Belgian entry is a regional vision, issued by the Flemish Ministry of Education. Rights and data are protected in law: the Greek decision on personal data, the Italian AI law and the Cypriot criminal provision are the three binding entries at this level.

Meso · institutional governance

The meso level holds 34 entries and is where rules become specific. Fourteen entries are institutional policies or regulations, thirteen are advisory, and three describe bodies set up to carry the response: the OUC committee, the UAb task force and the Anadolu research unit. The vocabulary here is that of assessment, responsibility and integrity. The meso level also holds the only boundary drawn by data rather than by tool, the Anadolu rule that keeps personal data outside scope and runs examination item writing on local devices.

Micro · classroom and learning design

The micro level holds 18 entries, as many as the macro level, and the Dutch response reports that none are in place. What appears here is professional development, learning design and tools placed in the learning environment. Eight entries are teacher or staff programmes, seven concern learning design and five provide a tool. The classroom is the level the responses describe with most uncertainty, as pilots, limited adoption and unfinished implementation recur.

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10 Case profiles

Greece · Institute of Educational Policy

The Greek response concerns school education and is built around teachers. Its macro level combines a ministerial decision on personal data with two national strategies, one of them aligned with the EU AI Act. Its meso level is filled by national bodies: the Institute's Greek translation of UNESCO's guidance, an opinion of the bioethics commission and a foresight study. Its micro level holds five teacher programmes, one of them a pilot run with OpenAI, which makes it the response with the strongest orientation towards professional development.

Cyprus · Open University of Cyprus

The Cypriot response spans school and higher education and places the university inside a national picture. The macro level includes a strategy under consultation, advisory guidelines for schools, a criminal provision and a language infrastructure. At the institutional level the university has advisory guidelines, a committee, seminars for staff, students and the public, and a binding declaration of use for students. Its micro entries are pilots in learning design and student workshops on data protection and cross-checking.

Portugal · Universidade Aberta

The Portuguese response is the most extensive and reads as a survey of the national higher education sector. Two national entries, a task force and a recommendation of the National Education Council, frame twelve institutional documents from eleven universities and faculties, which range from binding faculty regulations to institute guidance. The response carries most of the assessment and integrity codes in the set. Its single micro entry is candid about the gap between design and practice: the pedagogical model foresees a course-specific AI tutor that is not yet in place.

Netherlands · Open Universiteit

The Dutch response names the government-wide vision on generative AI and reports no institutional governance and no classroom guidance at the university. It is the shortest response and the only one reporting absence. Read beside the university's own survey of widespread use, the absence describes the state of written governance.

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Italy · UNINETTUNO

The Italian response pairs a dense national frame with a university-built learning environment. A national strategy, a national AI law and ministerial policy directions form the macro level. The university's strategic plan integrates AI into its institutional development, and two published models describe generative AI inside its learning design, one of them a dialogic system that asks students to question and verify its answers. The meso answer ends mid-sentence in the submission.

Belgium · KU Leuven

The Belgian response arrived as ten separate submissions on one day, each naming a single source, and is read here as one response. It is built around universities. Its one entry above the institutional level is the Flemish Ministry of Education's policy statement and vision on responsible AI in education. Its institutional level reads as a survey of the sector: policies at KU Leuven, Ghent University, UCLouvain and UHasselt, instructions on AI in research ethics and a student council position at the University of Antwerp, and guidance on safe use from TU Delft in the Netherlands. Its micro entries are the Leuven Learning Lab's examples of responsible use, KU Leuven's five principles, an in-service GPT Academy run by UCLL and five Dutch-language articles on lesson preparation and assessment. Ethical and responsible use runs through six of its twelve entries, and none of them supplies a tool.

Türkiye · Anadolu University Open Education Faculty

The Anadolu response, compiled by the task lead, fills all three levels. National frames are strategic and advisory, and the Council of Higher Education's ethical guide on research leaves binding rules to universities. At the institutional level a graduate school made a declaration of use mandatory for theses, a research unit was established, a boundary was drawn by data rather than tool, and separate guides were published for academics and students, alongside an associate degree built around AI-assisted coding. The faculty's own position looks beyond policy text: requirements such as an audit trail, open protocols and provider-independent routing can be written into procurement, and staff development can move from individual training towards workshops in which colleagues compare their results on the same task.

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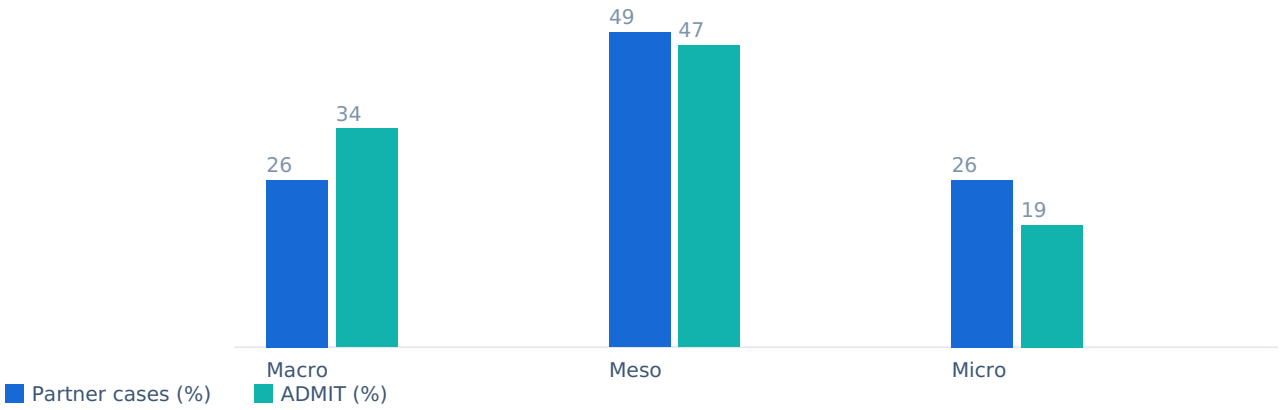
11 Comparison with the ADMIT synthesis

The second tab of this report synthesises the reports of the ADMIT partnership into a database of 64 practices. The two sets were produced by different instruments: ADMIT by multi-round surveys of students, staff and administrators with institutional returns, the partner cases by a call for named reports and practices. To compare them on the same ground, every case entry was also assigned to one of the twelve domains used in the ADMIT matrix.

Levels: a similar shape

The level distributions are close. ADMIT places 30 of 64 practices at the meso level, 22 at the macro level and 12 at the micro level; the cases place 34 of 70, 18 and 18. The index of dissimilarity between the two distributions is 0.087, meaning that about nine per cent of entries would have to change level for the two to coincide (Duncan & Duncan, 1955). Most of the difference lies in the classroom, which holds a quarter of the case entries against a fifth of the ADMIT practices. The convergence supports a reading already made in the ADMIT synthesis, that the classroom level is under-documented rather than empty: both instruments ask what exists, and what exists in writing gathers at the institution.

Figure 9. Share of entries by level: partner cases and ADMIT



Each pair of bars compares the share of the partner cases and of the ADMIT database at one level. The two distributions are close, with the largest share at the institutional level in both, and the classroom share is larger in the partner cases. The index of dissimilarity of 0.087 summarises the difference as the proportion of entries that would have to move for the two to match.

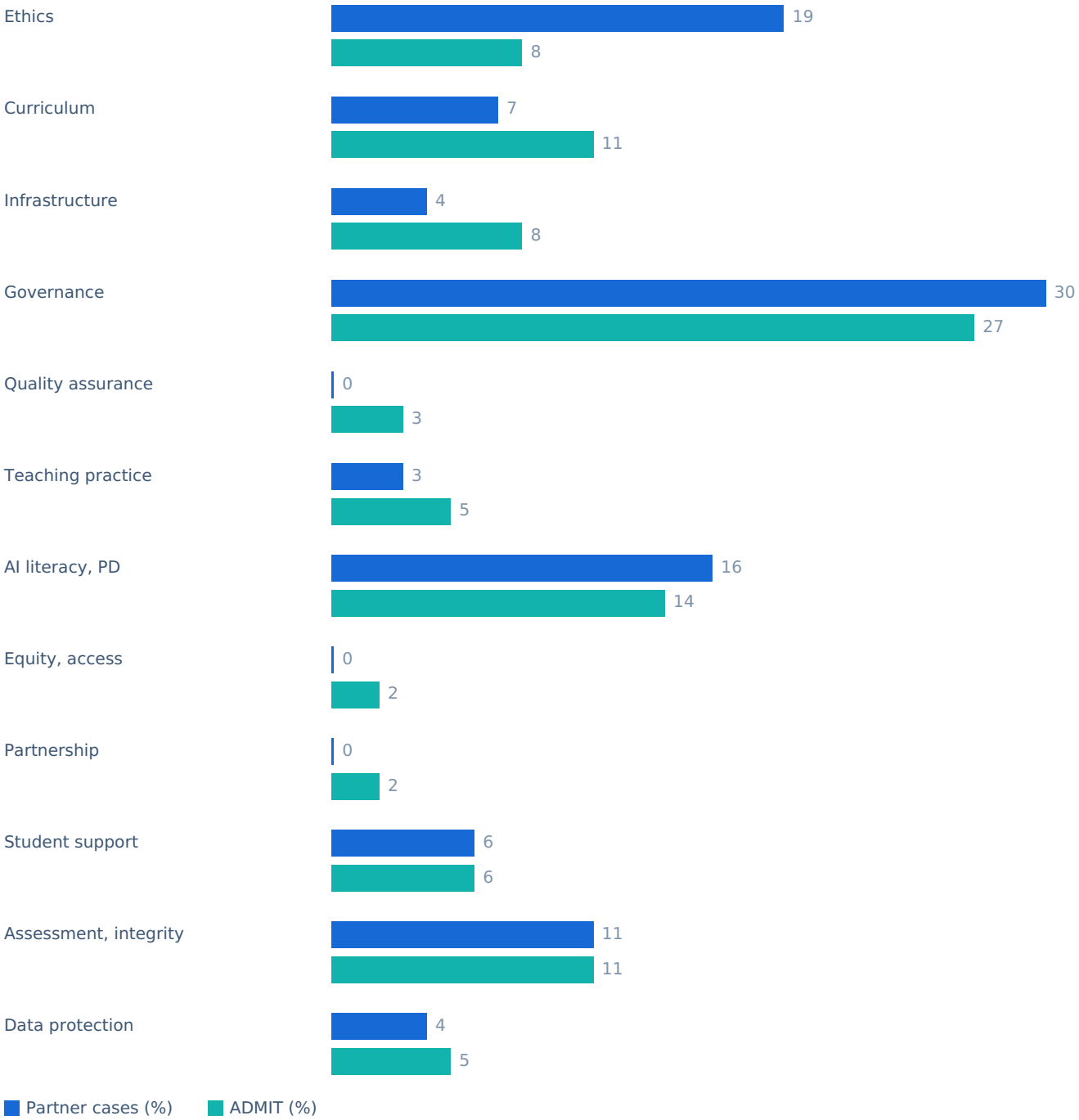
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Domains: governance steady, emphasis shifted

Across the twelve domains the index of dissimilarity rises to 0.163, so the two sets agree on levels more than on subjects. The governance domain is the steadiest point: it holds 21 case entries against 17 in ADMIT, a similar share of each set, and in both it sits at the macro and meso levels with none in the classroom. Around it the emphasis moves. Ethical frameworks and responsible use account for thirteen case entries against five in ADMIT, mostly through national opinions, institutional principles and the Belgian university policies. AI literacy and professional development are similar in size but sit lower: eight of the eleven case entries are micro, against four of nine in ADMIT. Student support changes level entirely, from four institutional services in ADMIT to three classroom tutors and one student guide in the cases. Curriculum is thinner in the cases, with five entries against seven, and quality assurance, partnership and equity, present though small in ADMIT, do not appear at all.

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Figure 10. Share of entries by domain: partner cases and ADMIT



Bars give the share of each set that falls in each of the twelve ADMIT domains, ordered by the size of the difference between the two sets. Governance takes a similar share in both, while ethics and literacy are larger in the partner cases and curriculum, quality assurance and partnership are larger in ADMIT. The index of dissimilarity across domains, 0.163, is nearly twice the index across levels.

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Models: what the cases confirm and what they add

The ADMIT synthesis describes seven recurring models. Several of them reappear in the cases in other countries, which makes them less dependent on a single partnership. Disclosure made a condition, which ADMIT found in a thesis declaration, appears in the cases as a binding student declaration in Cyprus and as disclosure provisions in two Portuguese institutions. The boundary drawn at the assessment event reappears in a more elaborate form, as regimes of permitted use defined for assessment at Aveiro and Iscte. The sequence of sandbox, unit and licence is visible in its first two stages, in pilots and in the committee, task force and research unit that three responses report; the licence stage appears only as a national pilot. Delegated discretion survives inside guidance: both the Universidade Aberta and the Anadolu student guides defer to what the teacher of the course allows.

The cases also add what the ADMIT instruments did not reach. They name a legal layer, a Greek ministerial decision on personal data, an Italian AI law and a Cypriot criminal provision, where ADMIT recorded mainly advisory national guidance. They bring in national advisory bodies and foresight studies as actors in their own right. And they describe AI tutors built into the learning design of two open universities, a practice the ADMIT rounds recorded mostly as experimentation. The observation that closes the ADMIT synthesis holds here as well: almost every entry is reported as existing, without an evaluation, and the pilots are described without their findings.

Institutions in both sets

Five institutions or systems appear in both sets, and reading them side by side shows where the record moved. At the Open University of Cyprus the two agree: the committee, the pilots in learning design and IT support and the seminars recorded in ADMIT appear again in the form, which adds a binding declaration of use for students, while the prohibition of use during examinations recorded in the third ADMIT report is not mentioned. At the Open Universiteit the two diverge. The first ADMIT report records an institution-wide steering committee installed in October 2024, whereas the 2026 response reports that no institutional governance currently exists; the sources do not show whether the committee is not regarded as governance or is no longer active. For Greece, both sets name the AI in Schools pilot with ChatGPT Edu, but ADMIT places it at the national level as provision of a tool and the form places it in the classroom as teacher development. For Italy, both name the national AI law, with different dates: the third ADMIT report gives 17 September 2025 and the form 23 September 2025, linking

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to the official consolidated text. The Anadolu answer agrees with ADMIT by construction, since it was compiled from the same sources. Portugal and Belgium have no counterpart in the ADMIT reports, so the twelve Portuguese and seven Belgian institutional entries are entirely new to the record.

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12 Conclusion

The partner cases describe a division of labour between levels. National texts give direction and protect rights; institutions write the rules that bind users, chiefly on disclosure and assessment; and classrooms receive training, design support and tools that are often still being tested. No response places a binding rule at the classroom level, and none places the provision of a tool at the national level except through infrastructure or a pilot.

The unevenness of the middle level is the finding with the most practical weight. The same question about institutional governance returned national agencies in one country, twelve documents in another, the policies of six universities in a third and nothing in a fourth. A comparison across the partnership therefore depends on recording, for each response, which body took the decision and at which level, as well as whether an instrument exists. Where the classroom is concerned, the cases suggest collecting accounts of practice directly, since instruments that ask for documents return documents.

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13 General table: responses, codes and themes

Table 2. Responses and entries

Response	Level	Entry	ADMIT domain	Codes	Themes
Greece	Macro	Ministerial decision on AI in the educational process and personal data	Data Protection, Privacy and Security	Law or binding regulation, Data protection	National frames, institutional rules
Greece	Macro	Digital Transformation Bible 2026–2030	Governance, Strategy and Policy	National strategy or plan, Infrastructure and data, AI literacy	National frames, institutional rules; Capacity before control; Tools as tutors and pilots
Greece	Macro	Blueprint for Greece's transition to the age of AI	Governance, Strategy and Policy	National strategy or plan, Expert opinion or foresight study	National frames, institutional rules; An uneven middle
Greece	Meso	Greek translation of UNESCO's guidance on generative AI	Ethical Frameworks and Responsible Use	Advisory guidance, Ethical and responsible use	National frames, institutional rules
Greece	Meso	Opinion on AI applications in Greek schools	Ethical Frameworks and Responsible Use	Expert opinion or foresight study, Ethical and responsible use	An uneven middle
Greece	Meso	Generative AI Greece 2030 foresight study	Governance, Strategy and Policy	Expert opinion or foresight study, Ethical and responsible use	An uneven middle
Greece	Micro	AI in Schools pilot with ChatGPT Edu	Infrastructure, Tools and Procurement	Partnership with a provider, Pilot or trial, Tool or platform provision, Professional development, Learning design	Capacity before control; Tools as tutors and pilots
Greece	Micro	GenAI Empowered Educators training programme	AI Literacy and Professional Development	Professional development, Learning design	Capacity before control
Greece	Micro	Online seminar on AI in teaching and learning	AI Literacy and Professional Development	Professional development, Ethical and responsible use	Capacity before control
Greece	Micro	B-Level ICT certification with AI modules	AI Literacy and Professional Development	Professional development, AI literacy	Capacity before control
Greece	Micro	Sub8 short professional development on AI and TPACK	AI Literacy and Professional Development	Professional development, Learning design	Capacity before control
Cyprus	Macro	National AI strategy to 2032 under public consultation	Governance, Strategy and Policy	National strategy or plan, In preparation or consultation	National frames, institutional rules; An uneven middle

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Response	Level	Entry	ADMIT domain	Codes	Themes
Cyprus	Macro	Guidelines for responsible and ethical AI in primary and secondary education	Ethical Frameworks and Responsible Use	Advisory guidance, Ethical and responsible use	National frames, institutional rules
Cyprus	Macro	Criminal law on AI-generated child sexual abuse material	Ethical Frameworks and Responsible Use	Law or binding regulation, Ethical and responsible use	National frames, institutional rules
Cyprus	Macro	Pharos-CY AI factory antenna for the Greek language	Infrastructure, Tools and Procurement	Infrastructure and data, National language resources	Tools as tutors and pilots
Cyprus	Macro	Open course on AI in education	AI Literacy and Professional Development	AI literacy, Professional development	Capacity before control
Cyprus	Meso	Advisory guidelines on generative AI for the university community	Ethical Frameworks and Responsible Use	Advisory guidance, Ethical and responsible use, Transparency, Critical thinking and verification	National frames, institutional rules
Cyprus	Meso	AI committee	Governance, Strategy and Policy	Committee, task force or unit	An uneven middle
Cyprus	Meso	Seminars for staff, students and the public on generative AI	AI Literacy and Professional Development	Professional development, AI literacy, Data protection, Critical thinking and verification	Capacity before control
Cyprus	Meso	Binding declaration of generative AI use for students	Assessment and Academic Integrity	Disclosure of use, Academic integrity, Institutional policy or regulation, Ethical and responsible use	National frames, institutional rules; Disclosure and assessment as the institutional grammar
Cyprus	Micro	Pilot tests of AI tools in learning design and IT support	Curriculum and Learning Design	Pilot or trial, Tool or platform provision, Learning design	Capacity before control; Tools as tutors and pilots
Cyprus	Micro	Student workshops on good practice with LLMs	AI Literacy and Professional Development	AI literacy, Data protection, Critical thinking and verification, Transparency	Capacity before control
Portugal	Macro	Ministerial task force on technology and AI across education levels	Governance, Strategy and Policy	Committee, task force or unit, In preparation or consultation	An uneven middle
Portugal	Macro	National Education Council recommendation on AI in education	Governance, Strategy and Policy	Advisory guidance, AI literacy, Human oversight	National frames, institutional rules; Capacity before control
Portugal	Meso	Policy on the responsible use of generative AI	Governance, Strategy and Policy	Institutional policy or regulation, AI literacy, Ethical and responsible use	National frames, institutional rules; Capacity before control
Portugal	Meso	Recommendations on generative AI in teaching, learning and assessment	Assessment and Academic Integrity	Advisory guidance, Academic integrity, Critical thinking and verification, Assessment design	National frames, institutional rules; Disclosure and assessment as the institutional grammar

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Response	Level	Entry	ADMIT domain	Codes	Themes
Portugal	Meso	Recommendations on AI in teaching, learning and assessment	Ethical Frameworks and Responsible Use	Advisory guidance, Transparency, Equity and access, Human oversight, Assessment design, Ethical and responsible use	National frames, institutional rules; Disclosure and assessment as the institutional grammar
Portugal	Meso	Guidelines for the use of AI tools in academic work	Assessment and Academic Integrity	Institutional policy or regulation, Disclosure of use, Records of interaction, Assessment design	National frames, institutional rules; Disclosure and assessment as the institutional grammar
Portugal	Meso	Policies, principles and guidelines for responsible AI use	Governance, Strategy and Policy	Institutional policy or regulation, Academic integrity, Human oversight, Data protection, Transparency	National frames, institutional rules; Disclosure and assessment as the institutional grammar
Portugal	Meso	Recommendations on the use of AI tools	Ethical Frameworks and Responsible Use	Advisory guidance, Disclosure of use, Data protection, Assessment design, Research and publication, Ethical and responsible use	National frames, institutional rules; Disclosure and assessment as the institutional grammar
Portugal	Meso	Principles and recommendations on generative AI	Assessment and Academic Integrity	Advisory guidance, Human oversight, Academic integrity, Critical thinking and verification, Transparency, Research and publication	National frames, institutional rules; Disclosure and assessment as the institutional grammar
Portugal	Meso	Guidelines for responsible generative AI in higher education and scientific publishing	Ethical Frameworks and Responsible Use	Advisory guidance, Ethical and responsible use, Research and publication	National frames, institutional rules; Disclosure and assessment as the institutional grammar
Portugal	Meso	Teaching and assessment regulations with provisions on AI	Assessment and Academic Integrity	Institutional policy or regulation, Assessment design, Equity and access	National frames, institutional rules; Disclosure and assessment as the institutional grammar
Portugal	Meso	Recommendations on AI use for students	Student Support and Guidance	Advisory guidance, Data protection, Assessment design, Records of interaction, Critical thinking and verification	National frames, institutional rules; Disclosure and assessment as the institutional grammar
Portugal	Meso	Framework for assessment in the age of AI	Assessment and Academic Integrity	Institutional policy or regulation, Assessment design, Academic integrity, Transparency	National frames, institutional rules; Disclosure and assessment as the institutional grammar
Portugal	Meso	Pedagogical model integrating AI in the curriculum	Curriculum and Learning Design	Curriculum and programme, Institutional policy or regulation, Learning design	National frames, institutional rules; Capacity before control
Portugal	Meso	Task force for an institution-wide AI policy	Governance, Strategy and Policy	Committee, task force or unit, In preparation or consultation	An uneven middle
Portugal	Micro	AI personal tutor in the Computer Science degree	Student Support and Guidance	Tool or platform provision, Personalised tutoring, In preparation or consultation	Tools as tutors and pilots; An uneven middle

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Response	Level	Entry	ADMIT domain	Codes	Themes
Netherlands	Macro	Government-wide vision on generative AI	Governance, Strategy and Policy	National strategy or plan	National frames, institutional rules
Netherlands	Meso	No institutional governance in place	Governance, Strategy and Policy	Nothing in place	An uneven middle
Netherlands	Micro	No classroom-level guidance in place	Teaching Practice	Nothing in place	An uneven middle
Italy	Macro	Italian Strategy for Artificial Intelligence 2024–2026	Governance, Strategy and Policy	National strategy or plan, Ethical and responsible use, Equity and access	National frames, institutional rules
Italy	Macro	Law No. 132 of 2025 on artificial intelligence	Governance, Strategy and Policy	Law or binding regulation, Transparency, Human oversight, Ethical and responsible use	National frames, institutional rules
Italy	Macro	Ministerial policy directions for 2026 on teaching innovation and access	Governance, Strategy and Policy	National strategy or plan, Equity and access, Learning design	National frames, institutional rules; Capacity before control
Italy	Meso	Strategic Plan 2024–2026 as a framework for AI adoption	Governance, Strategy and Policy	Institutional policy or regulation, Professional development, Tool or platform provision	National frames, institutional rules; Capacity before control; Tools as tutors and pilots
Italy	Micro	Socrates AI: dialogic generative AI for critical and personalised learning	Student Support and Guidance	Tool or platform provision, Personalised tutoring, Critical thinking and verification, Learning design	Capacity before control; Tools as tutors and pilots
Italy	Micro	Generative AI within the psycho-pedagogical model	Curriculum and Learning Design	Learning design, Personalised tutoring, Critical thinking and verification, Human oversight	Capacity before control; Tools as tutors and pilots
Belgium	Macro	Flemish policy statement and vision on responsible AI in education	Governance, Strategy and Policy	National strategy or plan, Ethical and responsible use	National frames, institutional rules
Belgium	Meso	KU Leuven policies on generative AI for students, teachers, researchers and administrative staff	Governance, Strategy and Policy	Institutional policy or regulation, Advisory guidance, Professional development	National frames, institutional rules; Capacity before control
Belgium	Meso	Ghent University policies on the responsible use of AI	Ethical Frameworks and Responsible Use	Institutional policy or regulation, Ethical and responsible use	National frames, institutional rules
Belgium	Meso	Instructions on AI in research ethics and integrity	Ethical Frameworks and Responsible Use	Advisory guidance, Research and publication, Ethical and responsible use	National frames, institutional rules; Disclosure and assessment as the institutional grammar
Belgium	Meso	Student council position on AI	Ethical Frameworks	Expert opinion or foresight study, Ethical	An uneven middle

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Response	Level	Entry	ADMIT domain	Codes	Themes
		ethics	and Responsible Use	and responsible use	
Belgium	Meso	UCLouvain policy on AI with training and advice for students and teachers	Governance, Strategy and Policy	Institutional policy or regulation, Advisory guidance, Professional development, AI literacy	National frames, institutional rules; Capacity before control
Belgium	Meso	Overview of AI policies for research, students and teachers	Governance, Strategy and Policy	Institutional policy or regulation, Research and publication	National frames, institutional rules; Disclosure and assessment as the institutional grammar
Belgium	Meso	Guidance on using AI safely for staff and students	Data Protection, Privacy and Security	Advisory guidance, Data protection	National frames, institutional rules
Belgium	Micro	Best practices and examples of responsible GenAI use in teaching	Teaching Practice	Professional development, Ethical and responsible use	Capacity before control
Belgium	Micro	Five key principles for the use of GenAI	Ethical Frameworks and Responsible Use	Advisory guidance, Ethical and responsible use	National frames, institutional rules
Belgium	Micro	GPT Academy for in-service learning in small organisations	AI Literacy and Professional Development	Professional development, AI literacy	Capacity before control
Belgium	Micro	Dutch-language research on teaching, lesson preparation and assessment with generative AI	Curriculum and Learning Design	Learning design, Assessment design	Capacity before control; Disclosure and assessment as the institutional grammar
Türkiye	Macro	National AI strategy, AI in education action plan and research guidelines	Governance, Strategy and Policy	National strategy or plan, Advisory guidance, Research and publication	National frames, institutional rules; Disclosure and assessment as the institutional grammar
Türkiye	Macro	Ethical guide on generative AI in research and publication	Ethical Frameworks and Responsible Use	Advisory guidance, Ethical and responsible use, Research and publication	National frames, institutional rules; Disclosure and assessment as the institutional grammar
Türkiye	Macro	AI-generated items in national standardised examinations	Assessment and Academic Integrity	Assessment design	Disclosure and assessment as the institutional grammar
Türkiye	Meso	Mandatory generative AI declaration in the thesis writing guide	Assessment and Academic Integrity	Disclosure of use, Academic integrity, Research and publication, Institutional policy or regulation	National frames, institutional rules; Disclosure and assessment as the institutional grammar
Türkiye	Meso	Data Analytics and Artificial Intelligence Research Unit	Infrastructure, Tools and Procurement	Committee, task force or unit, Infrastructure and data	Tools as tutors and pilots; An uneven middle

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Response	Level	Entry	ADMIT domain	Codes	Themes
Türkiye	Meso	A boundary drawn by data rather than by tool	Data Protection, Privacy and Security	Data protection, Infrastructure and data, Institutional policy or regulation	National frames, institutional rules; Tools as tutors and pilots
Türkiye	Meso	Guide to generative AI for academics	AI Literacy and Professional Development	Advisory guidance, Professional development, Data protection, Critical thinking and verification	National frames, institutional rules; Capacity before control
Türkiye	Meso	Associate degree in AI-assisted coding	Curriculum and Learning Design	Curriculum and programme	Capacity before control
Türkiye	Micro	Guide to generative AI for students	AI Literacy and Professional Development	AI literacy, Disclosure of use, Critical thinking and verification, Advisory guidance	National frames, institutional rules; Capacity before control; Disclosure and assessment as the institutional grammar
Türkiye	Micro	Modules on AI literacy and on prompt and context engineering	AI Literacy and Professional Development	AI literacy, Professional development	Capacity before control
Türkiye	Micro	Chatbot for non-academic student support	Student Support and Guidance	Tool or platform provision, Student support service	Tools as tutors and pilots

The level is the one the respondent chose. Themes are derived from the codes, so an entry can belong to several themes.

Table 3. Codebook

Code	Category	Definition	n	Macro	Meso	Micro
National strategy or plan	Form of the instrument	A national strategy, roadmap or set of policy directions.	8	8	0	0
Law or binding regulation	Form of the instrument	A law, decree or ministerial decision with legal force.	3	3	0	0
Advisory guidance	Form of the instrument	Guidelines, recommendations or frameworks without binding force.	19	4	13	2
Institutional policy or regulation	Form of the instrument	A policy, plan or regulation formally adopted by an institution or faculty.	14	0	14	0
Expert opinion or foresight study	Form of the instrument	An opinion of an advisory body or a study proposing strategies.	4	1	3	0
Committee, task force or unit	Form of the instrument	A body is created to carry the response.	4	1	3	0
In preparation or consultation	Form of the instrument	The instrument is announced, under consultation or not yet complete.	4	2	1	1
Professional development	Capacity building	Training, seminars or certification for teachers and staff.	14	1	5	8
AI literacy	Capacity building	Building general understanding of AI among students, staff or the public.	11	3	3	5
Curriculum and	Capacity building	AI written into a programme, a degree	2	0	2	0

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Code	Category	Definition	n	Macro	Meso	Micro
programme		or a pedagogical model.				
Learning design	Capacity building	AI used in designing materials, activities or learning environments.	9	1	1	7
Disclosure of use	Integrity and accountability	Users are required or advised to declare that and how AI was used.	5	0	4	1
Academic integrity	Integrity and accountability	Originality, authorship and honest academic work.	6	0	6	0
Assessment design	Integrity and accountability	Rules for AI in assessment or the redesign of assessment.	9	1	7	1
Transparency	Integrity and accountability	Transparency named as a principle.	7	1	5	1
Records of interaction	Integrity and accountability	Users keep or document their interactions with the tool.	2	0	2	0
Human oversight	Integrity and accountability	Human oversight or human authorship named as a requirement.	6	2	3	1
Research and publication	Integrity and accountability	Rules for AI in research, theses or scientific publishing.	8	2	6	0
Ethical and responsible use	Values and protections	Ethics or responsibility named as the aim.	21	6	12	3
Data protection	Values and protections	Personal data, privacy or data minimisation.	9	1	7	1
Equity and access	Values and protections	Inclusion, equity or wider access.	4	2	2	0
Critical thinking and verification	Values and protections	Critical evaluation of output or verification of information.	10	0	6	4
Tool or platform provision	Provision of tools and infrastructure	A tool, assistant or platform is made available.	6	0	1	5
Personalised tutoring	Provision of tools and infrastructure	AI acting as a personal tutor or learning companion.	3	0	0	3
Pilot or trial	Provision of tools and infrastructure	The provision is explicitly a pilot or test.	2	0	0	2
Infrastructure and data	Provision of tools and infrastructure	Computing infrastructure, data resources or hosting decisions.	4	2	2	0
National language resources	Provision of tools and infrastructure	AI resources built for or translated into the national language.	1	1	0	0
Partnership with a provider	Provision of tools and infrastructure	A public body works with a commercial AI provider.	1	0	0	1
Student support service	Provision of tools and infrastructure	AI in administrative or non-academic student support.	1	0	0	1
Nothing in place	Reported absence	The respondent reports no instrument or practice at this level.	2	0	1	1

Frequency is the number of entries carrying the code; 199 code assignments were made in total.

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Table 4. Themes

Theme	Defining codes	Macro	Meso	Micro
National frames, institutional rules	National strategy or plan, Law or binding regulation, Institutional policy or regulation, Advisory guidance	14	25	2
Capacity before control	Professional development, AI literacy, Curriculum and programme, Learning design	4	8	14
Disclosure and assessment as the institutional grammar	Disclosure of use, Academic integrity, Assessment design, Records of interaction, Research and publication	3	14	2
Tools as tutors and pilots	Tool or platform provision, Personalised tutoring, Pilot or trial, Partnership with a provider, Student support service, Infrastructure and data, National language resources	2	3	6
An uneven middle	Committee, task force or unit, Expert opinion or foresight study, In preparation or consultation, Nothing in place	3	7	2

An entry belongs to a theme when it carries one of the theme's defining codes.

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14 Evidence trail

Every entry and every claim not derived from an entry is tied to the sentence in its source. All 96 quotations were located in their sources when the report was compiled. Locations are rows in the form responses and pages in PDF documents.

Partner response form · ETHICAI Task 2.2 call for best practices and models: partner responses

> Determination of issues related to the use of Artificial Intelligence systems during the educational process and the protection of personal data.
>
> GR-1 Ministerial decision on AI in the educational process and personal data · row 2

> It outlines the roadmap of the 2026-2030 national digital strategy, presenting key interventions, initiatives, and actions in infrastructure, education, and population training aimed at developing modern digital skills.
>
> GR-2 Digital Transformation Bible 2026–2030 · row 2

> The plan fully aligns with the European AI Act and focuses on the holistic integration of AI at all levels of education through specific actions.
>
> GR-3 Blueprint for Greece's transition to the age of AI · row 2

> Availability of the resource in Greek empowers the educational and academic community in responsible and ethical engagement with AI.
>
> GR-4 Greek translation of UNESCO's guidance on generative AI · row 2

> analyzing the ethical and social implications of these applications, and, on the other hand, of formulating relevant recommendations for the State.
>
> GR-5 Opinion on AI applications in Greek schools · row 2

> proposes strategies for the gradual introduction of GenAI tools in schools, alongside the establishment of ethical guidelines and the strengthening of academic research.
>
> GR-6 Generative AI Greece 2030 foresight study · row 2

> aimed at empowering educators to make effective and responsible use of GenAI tools, including the ChatGPT Edu platform, in developing instructional materials.
>
> GR-7 AI in Schools pilot with ChatGPT Edu · row 2

> focuses on the use of GenAI by teachers in the design of educational material, teaching resources, and collaborative workflows.
>
> GR-8 GenAI Empowered Educators training programme · row 2

> tackling the question of the pedagogically effective and responsible use of AI in the classroom.
>
> GR-9 Online seminar on AI in teaching and learning · row 2

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The flagship, accredited ICT training program delivered by ITYE Diophantus and IEP integrates updated modules covering AI tools.

GR-10 B-Level ICT certification with AI modules · row 2

incorporating AI elements into Technological Pedagogical Content Knowledge (TPACK).

GR-11 Sub8 short professional development on AI and TPACK · row 2

advisory upgraded Cyprus national strategy on AI until 2032 placed under public consultation by the 31st of August 2026

CY-1 National AI strategy to 2032 under public consultation · row 3

advisory policy document and guidelines for the responsible and ethical utilisation of AI in primary and secondary education in Cyprus, October 2025

CY-2 Guidelines for responsible and ethical AI in primary and secondary education · row 3

criminalization of the use of artificial intelligence in the production of child pornography in Cyprus

CY-3 Criminal law on AI-generated child sexual abuse material · row 3

targets at providing infrastructure, data, and AI tools for the greek language

CY-4 Pharos-CY AI factory antenna for the Greek language · row 3

It focuses comprehensively on the practical deployment and role of AI in education

CY-5 Open course on AI in education · row 3

to effectively utilize the technology with responsibility and critical thinking, ensuring ethical standards, intellectual property, and transparency

CY-6 Advisory guidelines on generative AI for the university community · row 3

establishment of an AI committee in OUC

CY-7 AI committee · row 3

seminars/workshops organized by OUC for staff, students and the general public on generative AI & LLMs promoting good practices in using LLMs (protection of personal data, objective non-directed prompts, targeted prompts, cross-checking of results etc)

CY-8 Seminars for staff, students and the public on generative AI · row 3

binding declaration of GenAI use for students aiming in using GenAI with responsibility during their studies

CY-9 Binding declaration of generative AI use for students · row 3

pilot tests of AI tools in learning design and IT support at the OUC

CY-10 Pilot tests of AI tools in learning design and IT support · row 3

seminars/workshops organized by OUC for students on generative AI & LLMs promoting good practices in using LLMs (protection personal data, objective non-directed prompts, targeted prompts, cross-checking of results, transparency etc)

CY-11 Student workshops on good practice with LLMs · row 3

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A task force established by the Minister is preparing a report assessing the use of technology and AI across primary, secondary and higher education in Portugal.

PT-1 Ministerial task force on technology and AI across education levels · row 4

It addresses AI literacy, pedagogical integration, human oversight and governance across educational levels, including higher education.

PT-2 National Education Council recommendation on AI in education · row 4

Institutional policy approved in July 2026, addressing responsible AI use and AI literacy among students, teaching staff, researchers and professional staff.

PT-3 Policy on the responsible use of generative AI · row 4

Institutional recommendations emphasising critical thinking, academic integrity, originality and independent knowledge production.

PT-4 Recommendations on generative AI in teaching, learning and assessment · row 4

Institutional framework based on responsibility, transparency, inclusion, equity and human oversight.

PT-5 Recommendations on AI in teaching, learning and assessment · row 4

addresses permitted uses, disclosure of AI assistance, interaction records and assessment design.

PT-6 Guidelines for the use of AI tools in academic work · row 4

Institutional policy covering teaching, research, management and services, with provisions on academic integrity, human oversight, data protection and transparency.

PT-7 Policies, principles and guidelines for responsible AI use · row 4

Recommendations for students, teaching staff and researchers covering learning, assessment and research, including disclosure, individual responsibility and data protection.

PT-8 Recommendations on the use of AI tools · row 4

Institute-level guidance addressing human authorship, academic responsibility, critical thinking, originality and transparency in research and assessment.

PT-9 Principles and recommendations on generative AI · row 4

Guidance developed by the Bioethics Centre and adopted by the FMUP/RISE-Health Ethics Committee, covering teaching, knowledge production and scientific publishing.

PT-10 Guidelines for responsible generative AI in higher education and scientific publishing · row 4

Formal faculty regulations containing provisions on AI in teaching and assessment, including pedagogical use and equitable access.

PT-11 Teaching and assessment regulations with provisions on AI · row 4

Student guidance covering privacy, AI use in assessment according to teaching staff instructions, documentation of interactions and information verification.

PT-12 Recommendations on AI use for students · row 4

Institutional framework for AI-aware assessment, defining permitted-use regimes and guidance for assessment redesign, academic integrity, transparency, and credible evidence of student

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learning.

PT-13 Framework for assessment in the age of AI · row 4

Also highlight the existing new pedagogical model of UAb that integrates AI in the curriculum and practices.

PT-14 Pedagogical model integrating AI in the curriculum · row 4

UAb is currently setting up a task force for writing up a new policy for the use of AI in teaching, learning, assessment, research and management.

PT-15 Task force for an institution-wide AI policy · row 4

including in the Computer Science degree, where it supports students as a personal tutor. However, adoption remains limited.

PT-16 AI personal tutor in the Computer Science degree · row 4

an AI-powered personal tutor tailored to each course, implementation is not yet complete.

PT-16 AI personal tutor in the Computer Science degree · row 4

Dutch government's vision on GenAI usage

NL-1 Government-wide vision on generative AI · row 5

No institutional governance existing at OUNL currently

NL-2 No institutional governance in place · row 5

No classroom-level guidance existing at OUNL currently

NL-3 No classroom-level guidance in place · row 5

The Italian Strategy for Artificial Intelligence 2024–2026 provides the main national policy framework for the development and adoption of AI in Italy.

IT-1 Italian Strategy for Artificial Intelligence 2024–2026 · row 6

This law establishes the Italian legislative framework for artificial intelligence, complementing the EU AI Act.

IT-2 Law No. 132 of 2025 on artificial intelligence · row 6

identify innovation in university teaching and wider access to higher education among the national priorities, with particular attention to artificial intelligence and new technologies.

IT-3 Ministerial policy directions for 2026 on teaching innovation and access · row 6

The Strategic Plan integrates artificial intelligence into the institutional development of Università UNINETTUNO.

IT-4 Strategic Plan 2024–2026 as a framework for AI adoption · row 6

Socrates AI is integrated into the digital learning environment of Università UNINETTUNO as a Generative AI-based learning support system.

IT-5 Socrates AI: dialogic generative AI for critical and personalised learning · row 6

critically evaluate AI-generated answers and verify the sources provided.

IT-5 Socrates AI: dialogic generative AI for critical and personalised learning · row 6

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while preserving the active role of the student, critical evaluation of information and interaction with teachers and tutors.

IT-6 Generative AI within the psycho-pedagogical model · row 6

This is the official policy statement from the Ministry of Education in Flanders, Belgium. It includes a vision text that is also avilable in English

BE-1 Flemish policy statement and vision on responsible AI in education · row 11

an overview of the policies at KU Leuven for different target groups : students, teachers, researchers and admin staff. it leads to quite extensive documentation, ruls and regulations and training initiatives.

BE-2 KU Leuven policies on generative AI for students, teachers, researchers and administrative staff · row 8

Ghent University AI policies on responsible use

BE-3 Ghent University policies on the responsible use of AI · row 9

In the context of their ethical policies, the University of Antwerp has these instructions related to research. They do not seem to directly target education. They focus on PhD stduents and researchers

BE-4 Instructions on AI in research ethics and integrity · row 10

The Antwerp student council addresses AI ethics

BE-5 Student council position on AI ethics · row 10

Policy of the UCLouvain in Wallonia, Belgium (in French)

BE-6 UCLouvain policy on AI with training and advice for students and teachers · row 12

It includes training and advise for students and teachers.

BE-6 UCLouvain policy on AI with training and advice for students and teachers · row 12

UHasselt (Flanders, Belgium) Overview page with all their policies

BE-7 Overview of AI policies for research, students and teachers · row 13

Includes research,, students, teachers

BE-7 Overview of AI policies for research, students and teachers · row 13

TU Delft How can I use AI safely?

BE-8 Guidance on using AI safely for staff and students · row 17

it address both staff as well as students

BE-8 Guidance on using AI safely for staff and students · row 17

Some best practices and examples worked out by the Leanring Lab @kuleuven

BE-9 Best practices and examples of responsible GenAI use in teaching · row 14

se also "5 Key principles for the use of GenAI"

BE-10 Five key principles for the use of GenAI · row 14

Is an initiative of UCLL, targets in-service learning, for small organisations

BE-11 GPT Academy for in-service learning in small organisations · row 15

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Some Dutch language articles on teaching with AI

BE-12 Dutch-language research on teaching, lesson preparation and assessment with generative AI · row 16

De kracht van Artificiële Intelligentie: revolutionaire lesvoorbereidingen voor de toekomst?

BE-12 Dutch-language research on teaching, lesson preparation and assessment with generative AI · row 16

Tijd voor actie: een voorstel om met GenAI het onderwijs nog beter te maken.

BE-12 Dutch-language research on teaching, lesson preparation and assessment with generative AI · row 16

Sire, wat evalueren wij nog? Generatieve AI, beoordelingsvaliditeit en de toekomst van taken en masterproeven in het hoger onderwijs.

BE-12 Dutch-language research on teaching, lesson preparation and assessment with generative AI · row 16

No institutional governance existing at OUNL currently

Comparison with the ADMIT synthesis · row 5

Law No. 132 of 23 September 2025

Comparison with the ADMIT synthesis · row 6

ADMIT Report 3 (2026) · ADMIT Report 3 (2026)

Key frameworks include the National Artificial Intelligence Strategy (2021–2025), the AI in Education Policy Document and Action Plan (2025–2029)

TR-1 National AI strategy, AI in education action plan and research guidelines

there is still no fully standardized, detailed regulation specifically for generative AI in education, leaving universities with significant responsibility

TR-1 National AI strategy, AI in education action plan and research guidelines

Questions for standardized exams are now being generated using artificial intelligence

TR-3 AI-generated items in national standardised examinations

their use is prohibited during exams, while it may be permitted for preparing assignments or activities if transparency is ensured

Comparison with the ADMIT synthesis

Greece has launched pilot initiatives, such as the “AI in Schools” program, introducing ChatGPT Edu with teacher training and phased student access starting in late 2025

Comparison with the ADMIT synthesis

with recent national legislation (Law No 132 of 17 September 2025)

Comparison with the ADMIT synthesis

Koçdar et al. (2024) · Koçdar et al. (2024), D3.1

The Turkish Higher Education Council published the 'Ethical Guide on the Use of Generative Artificial Intelligence in Scientific Research and Publication Activities in Higher Education Institutions' in May 2024

TR-2 Ethical guide on generative AI in research and publication · p. 35

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> These guidelines are all advisory.
>
> TR-2 Ethical guide on generative AI in research and publication · p. 35

> The Graduate Education Institute has updated its Thesis Writing Guide in 2024, requiring students to sign a 'Generative Artificial Intelligence Usage Declaration' form.
>
> TR-4 Mandatory generative AI declaration in the thesis writing guide · p. 32

> In 2023, the Data Analytics and Artificial Intelligence Research Unit was established. The infrastructure setup of the unit is still ongoing.
>
> TR-5 Data Analytics and Artificial Intelligence Research Unit · p. 32

> A rule-based AI chatbot is being used for non-academic (administrative) support to answer student questions about enrolment, examinations, graduation, and more.
>
> TR-11 Chatbot for non-academic student support · p. 32

> An institution-wide steering committee has just been installed (oct 2024)
>
> Comparison with the ADMIT synthesis · p. 33

Öncü & Bozkurt (2026a) · The elephant in the dark: The diffusion of generative AI in higher education and the level of the decision

> The decision is not at the level of the rectorate, yet it binds at the micro level.
>
> TR-4 Mandatory generative AI declaration in the thesis writing guide

> Administrative processes containing no personal data fall within scope, and tasks holding personal data fall outside it.
>
> TR-6 A boundary drawn by data rather than by tool

> Sensitive processes are run on locally hosted devices; the writing of examination questions is one of the places where this applies.
>
> TR-6 A boundary drawn by data rather than by tool

> Separate guides were published for students and for academic staff, and modules on literacy and on prompt and context engineering were opened.
>
> TR-10 Modules on AI literacy and on prompt and context engineering

> In student support the chatbot has been in use for years and no separate text regulating its use is reported
>
> TR-11 Chatbot for non-academic student support

> At an open university that published its own survey, 96 per cent of students and 95 per cent of academic staff reported using these tools (Open Universiteit, 2024).
>
> Themes

> An analysis looking from outside will find no text at the centre and will count the institution as having no policy.
>
> Themes

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> At an open university that published its own survey, 96 per cent of students and 95 per cent of academic staff reported using these tools (Open Universiteit, 2024).
>
> Case profiles

Bozkurt & Öncü (2026a) · AÖF academic guide (2026)

> çift yönlü doğrulama, veri minimizasyonu ve kurumsal politika uyumu zorunlu kabul edilmelidir
>
> TR-7 Guide to generative AI for academics · p. 5

Programme page · AÖF programme page

> hızla dijitalleşen iş dünyasının ihtiyaç duyduğu, yapay zekâ destekli yazılım geliştirme becerilerine sahip nitelikli insan gücünü yetiştirmeyi amaçlamaktadır
>
> TR-8 Associate degree in AI-assisted coding

Bozkurt & Öncü (2026b) · AÖF student guide (2026)

> Önemli bilgilerin en az iki güvenilir kaynaktan kontrol edilmesinin
>
> TR-9 Guide to generative AI for students · p. 6

> Ders yönergesi izin vermiyorsa beyan yazmak yerine ÜYZ kullanılmaz.
>
> TR-9 Guide to generative AI for students · p. 15

Öncü & Bozkurt (2026b) · From principle to practice: Interoperable governance of agentic and generative AI in digital transformation

> Open and distance teaching universities can write three conditions into procurement: an audit trail that resolves, access through open protocols, and routing that is not tied to a single provider.
>
> Case profiles

> Practical workshops offer an alternative: several staff carry out one task separately, compare the results, and the disagreements become the subject of the session.
>
> Case profiles

Waselius et al. (2025) · Waselius et al. (2025), D3.2

> Establishment of AI committee, pilot tests of AI tools in learning design and IT support, seminars/workshops for staff, students and the general public
>
> Comparison with the ADMIT synthesis · p. 42

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15 Participating institutions and sources

- Institute of Educational Policy (IEP) (Greece), School education
- Open University of Cyprus (OUC) (Cyprus), Higher education and school education
- Universidade Aberta (UAb) (Portugal), Higher education
- Open Universiteit (OUNL) (Netherlands), Higher education
- International Telematic University UNINETTUNO (Italy), Higher education
- KU Leuven (Belgium), Higher education
- Anadolu University, Open Education Faculty (Türkiye), Higher education (open and distance learning)

The report uses only the content of the responses, the institution and the country; no personal information about the respondents is included.

FORM. ETHICAI Task 2.2 call for best practices and models: partner responses. Structured form circulated to the partners, asking for reports, models and practices at the macro, meso and micro levels with links and short explanations. Sixteen submissions from six partners were received between 15 and 25 September 2026. One partner submitted twice with identical content, counted once; KU Leuven sent ten separate submissions on 25 September, which are read together as one response. The task lead's own entries were added to the form afterwards from the documented sources listed here.

OB-FIL. The elephant in the dark: The diffusion of generative AI in higher education and the level of the decision. Book chapter manuscript that uses the Open Education Faculty as an illustrative case and describes its response at the three levels.

OB-ENV. From principle to practice: Interoperable governance of agentic and generative AI in digital transformation. Contribution prepared for the tenth EADTU Envisioning Report, stating the faculty's position on procurement conditions and practice-based staff development.

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