CHARM-EU principles on AI use in teaching and learning

Contains: partners policies comparison and comparison with EC framework

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Introduction: purpose, scope and methodology

The aim of this document is to support the CHARM-EU alliance in defining common principles for the use of Artificial Intelligence (AI) in teaching and learning.

CHARM-EUs partner institutions have already developed specific frameworks for the use of AI in teaching and learning within their home institution, reflecting local contexts, regulatory requirements, and pedagogical priorities.

Work Package 8.4 has been tasked with **defining an AI strategy for teaching and learning within CHARM-EU**. Following extensive discussion, the team agreed that developing a single, overarching policy to replace existing institutional policies is neither feasible nor desirable, as home institutional policies must take precedence in their respective contexts.

The team defined a three-step strategy:

1. To collect all existing policies and compare those policies to the Guidelines on the ethical use of artificial intelligence and data in teaching and learning for educators issued in 2022 and updated in 2026 by the European commission
2. To conduct a comparison between the policies to define common aspects and main differences
3. To define a list of CHARM-EU principles that integrate both comparisons and can be adopted when developing new courses in CHARM-EU European University

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Collection of CHARM's partners policies over the use of AI in teaching and learning

In 2025, we asked all partner institutions if there are policies or guidelines, mandatory or not) on the use of AI in teaching and learning.

University	Has a common guideline on AI uses? Add source
University of Barcelona	yes https://diposit.ub.edu/items/547cae4a-4528-44e4-8366-ea4aa0a2e8d1
Trinity College Dublin	yes https://www.tcd.ie/media/tcd/academic-practice/pdfs/college-statement-on-genai.pdf
Utrecht University	yes http://uu.nl/en/organisation/ai-policy And https://www.uu.nl/en/organisation/ai-policy/about-ai-at-uu/uu-ai-ethical-code-of-conduct And AI index for students - AI Policy - Utrecht University and https://www.uu.nl/en/organisation/ai-policy/teachers/for-teachers/ai-responsibility-matrix
University of Montpellier	yes https://numerique.umontpellier.fr/principes-ia-formation/
Eötvös Loránd University Budapest	yes https://www.elte.hu/dstore/document/208867/4-2025_%28X.28.%29_rektori_utas%C3%ADt%C3%A1s_MI_ai.pdf
Åbo Akademi University	yes Regulation on the Use of Artificial Intelligence at Åbo Akademi University (ÅA/248/00.00.01.01/2025); Procedure for using AI Tools in Research, Teaching and Studies (ÅA/249/00.00.01.01/2025). Available on the Intranet
Julius-Maximilians-University Würzburg	yes https://www.uni-wuerzburg.de/fileadmin/43180000/Tag_der_Lehre/Tag_der_Lehre_2025/20250709_Arbeitsfassung_Leitlinie_JMU_Umgang_mit_KI_V8.pdf
Ruhr West University of Applied Sciences	under construction -

With these materials, we started several comparisons (see Step 1 and 2) in order to understand overlapping elements in those policies and the EC.

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Details over each policy document collected

Universitat de Barcelona

Document: *Intel·ligència Artificial en la Docència – Implicació en les activitats d'aprenentatge i avaluació*.

Status: Published 2025 by Edicions UB under CC BY-NC-ND, authored by eight named professors and the Vice-Rectors for Teaching Policy and Digitalisation Policy.

Distinctive features:

- Distinct emphasis on **building an "ethical culture" rather than only a regulatory one,** and on positive educational uses.
- States explicitly that AI cannot be cited as authorship and cannot be held accountable.
- Proposes recommendations and a **model declaration of AI use** to be included in course outlines.

Trinity College Dublin (Ireland)

Document: *College Statement on Artificial Intelligence and Generative AI in Teaching, Learning, Assessment & Research*.

Status: Published by the Centre for Academic Practice in January 2025 (last updated 17 January 2025); described as a "living document".

Distinctive features:

- Articulates **four principles** aligned with the College's Statement on Integrity (2022) and the European Commission's Living Guidelines on the Responsible Use of Generative AI in Research (2024): **Transparency and Honesty**, **Responsibility and Accountability**, **Respect**, **Innovation**.
- Schools have explicit flexibility to set discipline-specific rules.
- A substantial FAQ section addresses **concrete uses**, citation, hallucinations, and lawful versus unlawful uses.
- **Strong, explicit stance on data lawfulness**: student work is treated as private information and is not allowed to be uploaded into a third-party GenAI tool for any reason.

Utrecht University

Documents: *UU AI Ethical Code of Conduct* (approved by the Executive Board on 13 May 2025); *AI Policy on the internet* (Students, Teachers, Researchers, Employees, About AI at UU sections); *AI index (Students); AI responsibility matrix* (Teachers, Employees) (approved by Executive Board)

Status: The AI ethical **code of conduct** is binding; on the internet there is information for operational guidance. The Code is a strong recommendation from the EU AI Regulation, Chapter X Codes of Conduct, Article 95(3).

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Distinctive features:

- The responsible use of AI and promotion of those values to students and teachers
- Clearly states the principle of university "agency" over AI deployment, naming Big Tech dominance and geopolitical influences as potential threats to academic and democratic values.
- Open attitude towards the adoption of AI in our education. The clear communication about the use of AI via the AI index and AI responsibility matrix.
- Differentiated guidance across four user groups (students, teachers, researchers, employees).
- Cooperation on national level with the other Dutch universities (LUNAI) on AI policy.
- Strong emphasis on AI literacy.
- The input of AI student ambassadors to the UU AI policy and the learning and teaching operation.

Université de Montpellier

Document: *Principes pour l'usage de l'IA dans la formation à l'Université de Montpellier.*

Status: Approved by the *Commission Formation et Vie Universitaire* on 28 January 2025 and presented to the *Conseil d'Administration* on 3 February 2025.

Distinctive features:

- Takes the form of **seven principles** each with two or three sub-points.
- Principle 1, "*Priority to the human relationship*", is given pride of place, making explicit a value that is implicit in most of the other policies.
- Equity (digital divide, digital literacy) and sustainability (*sobriété numérique*) are explicit concerns.
- The brevity is deliberate and leaves substantial room for interpretation at the level of the UFR/École/Institut.

Eötvös Loránd University, Budapest

Document: 4/2025. (X. 28.) rektori utasítás - a mesterséges intelligencia oktatásban történő használatáról az Eötvös Loránd Tudományegyetemen

Status: Binding Rector's Order signed by Dr. Lénárd Darázs on 27 October 2025; in force the day following promulgation. Adopted under section 74/E of the Academic Regulations for Students.

Distinctive features:

- Most operationally complete student-facing document, structured as ten articles followed by three annexes.
- Articulates a clear binary structure: "supported use" versus "prohibited use".
- If AI is used for creating content – text, pucture, charts etc. – in a students work as a part of the learning activities/deliverables (eg. papers, thesis, portfolio) , it should be indicated clearly and transparently. Otherwise it Is not considered supported use.

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- Faculty discretion is structured: faculties may make AI use mandatory in specific courses, may set stricter rules, and must publish faculty-specific rules by 31 January 2026.
- AI cannot be listed as an author; AI cannot assume responsibility.
- Encourages responsible use of AI while promoting critical thinking and awareness
- Establishes a compulsory AI literacy course for every student that has to be done before graduation.
- Should one violate the provisions, it entails the same consequences as a case of plagiarism, but using AI without indicating is not considered as plagiarism
- Most be evaluated and - if necessary - updated each year by the Rector's AI Commissioner

Åbo Akademi University

Documents: Regulation on the Use of Artificial Intelligence at Åbo Akademi University (ÅA/248/00.00.01.01/2025); Procedure for using AI Tools in Research, Teaching and Studies (ÅA/249/00.00.01.01/2025).

Status: Regulation and subordinate Procedure approved by the Rector on 25 February 2025; Regulation in force since 17 March 2025.

Distinctive features:

- The two-document structure separates **concepts and principles** (Regulation) from **operational rules** (Procedure), which is explicitly described as "subordinate".
- Open vs. closed environment is a structuring distinction: personal data, confidential information and copyright-protected material may only be processed in closed, approved environments.
- AI cannot confer authorship; AI tools are not citable references.

Julius-Maximilians-Universität Würzburg

Document: KI in der Hochschulpraxis – Kompass für den Einsatz in Lehre & Prüfung (working version, 9 July 2025).

Status: Working version of an institutional guideline; envisages the creation of a KI-Beirat (AI advisory board) and annual updates until 2030.

Distinctive features:

- Structured in three parts (general principles, recommendations for teachers, hints for students), with two checklists in annex.
- Sustainability ethics is foregrounded as a principle, with explicit treatment of computational, water and energy costs.
- Most **psychologically attentive** of the six documents: addresses both the loss of trust by teachers in students and the loss of trust by students in their own abilities.
- AI-generated content is explicitly not citable; AI cannot be a source.

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STEP 1: Comparison between university approaches and EU framework

This step aims to **map the seven partner policies against the ethical framework of the European Commission's** "*Guidelines on the ethical use of artificial intelligence and data in teaching and learning for educators*", originally published in 2022 and updated in March 2026 to reflect the EU AI Act and the rise of generative AI. (https://op.europa.eu/en/publication-detail/-/publication/f692aa0b-17a7-11f1-8870-01aa75ed71a1/).

The European Commission's framework

The 2022 Guidelines were **prepared by the European Commission's Expert Group on Artificial Intelligence and Data in Education and Training** under Action 6 of the Digital Education Action Plan 2021–2027.

Updated in 2026, the Guidelines **articulate five core ethical considerations** and eight key requirements for trustworthy AI.

AI definitions

AI system is: "a machine-based system designed to operate with varying levels of autonomy and that may exhibit adaptiveness after deployment and that, for explicit or implicit objectives, infers, from the input it receives, how to generate outputs such as predictions, content, recommendations, or decisions that can influence physical or virtual environments". European Union AI Act (2024)

GenAI is "an artificial intelligence (AI) technology that automatically generates content in response to prompts written in natural-language conversational interfaces" (UNESCO 2023).

AI Literacy : "Skills, knowledge and understanding that allow providers, deployers, and affected persons, taking into account their respective rights and obligations in the context of this Regulation, to make an informed deployment of AI systems, as well as to gain awareness about the opportunities and risks of AI and possible harm it can cause." European Union AI Act (2024)

Ethical considerations and key requirements

Each consideration and requirement are defined below in one sentence.

For the full reasoning and worked examples, please refer to the EC document itself.

Layer 1: Five core ethical considerations

- **Human dignity:** encompasses the right to privacy, human autonomy, and human agency. Central to this principle is the recognition of everyone's intrinsic value, approached with respect rather than treating persons as data objects.

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- **Fairness:** requires that all users receive equal access to opportunity. It includes equity, inclusion, non-discrimination, and fair distribution of rights and responsibilities.
- **Trust / Trustworthiness** involves ethical principles based on fundamental rights, including dimensions such as vulnerability of learners, power dynamics, and critical thinking. An AI tool is trustworthy when it is consistently reliable, transparent, respects privacy, avoids bias, and supports learning in line with institutional values.
- **Academic integrity:** NEW in 2026 as a Layer 1 consideration. It is foundational to the learning process and extends beyond tools to mindsets, competencies, and educational culture. It covers honest and ethical AI use, proper attribution, and assessment design that remains valid in the era of generative AI.
- **Justified choice:** requires the use of knowledge, facts, and data to justify necessary or appropriate collective choices by multiple stakeholders. It is based on participatory, collaborative models of decision-making, transparency, and explainability.

Layer 2: Eight key requirements for trustworthy AI

- **Human agency and oversight:** including fundamental rights, children's rights, human agency, and human oversight of AI tools.
- **Transparency and explainability:** including traceability, explainability, and communication of how AI tools operate and make decisions.
- **Diversity and inclusion:** NEW as a named standalone requirement. Including accessibility, universal design, and stakeholder participation.
- **Fairness and non-discrimination:** including the avoidance of unfair bias regardless of age, gender, abilities, or other historically disadvantaged attributes.
- **Societal and environmental wellbeing:** including sustainability, social responsibility, democracy, and psychosocial wellbeing.
- **Privacy and data governance:** including respect for privacy, quality and integrity of data, and access to data.
- **Technical robustness and safety:** including resilience to attack, cybersecurity, general safety, accuracy, reliability, and reproducibility.
- **Accountability:** added in 2026 version as a named standalone requirement. Including auditability, minimisation and reporting of negative impact, trade-offs, and redress.

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Comparison methodology

The comparison table below reproduces both layers (ethical considerations and key-requirement), using an AI (for documents not in English or French or Spanish), we compared partners policies and asked wherever the ethical consideration or key requirement was present in the document.

A representative from each university verified the results.

Legend:

●	**Explicitly addressed** The document explicitly names or develops the concept, in a way a reader looking for it would immediately find.	○	**Partially / implicitly addressed** The concept is present by implication, or mentioned briefly without being developed, or addressed indirectly through a related concept.
-	**Not addressed**		

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Criterion / Dimension	ÅA	UB	TCD	JMU	UM	UU	ELTE
LAYER 1 — Ethical Considerations (EC 2026, 5 criteria)							
Human dignity *The right to privacy, human autonomy, agency and the intrinsic value of each person*							
Respect for persons, privacy, autonomy and cultural heritage	○	●	●	○	●	●	○
Fairness *Equity, inclusion, non-discrimination and fair distribution of rights and responsibilities*							
Equal access and opportunity; addressing the digital divide	○	●	○	●	●	●	○
Trust / Trustworthiness *Reliability, alignment with fundamental rights and institutional values; power dynamics; critical thinking*							
Reliability and alignment with institutional values	○	●	●	●	●	●	●
Academic integrity *Honest and ethical AI use, proper attribution, assessment design valid in an AI-enhanced environment*							
Respect for intellectual property and copyright-protected material	●	●	●	●	●	●	●
Honesty and mandatory disclosure of AI use	●	●	●	●	●	●	●
Justified choice *Collective AI decisions grounded in knowledge/data; transparent, participatory and collaborative*							
Strategic reflection; evidence-based and participatory decision-making	○	●	○	●	●	●	○
LAYER 2 — Key Requirements for Trustworthy AI (EC 2026, 8 requirements)							

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Criterion / Dimension	ÅA	UB	TCD	JMU	UM	UU	ELTE
Human agency and oversight *Fundamental rights, human oversight; ability to review, override and intervene in AI outputs*							
Caution, critical thinking and professional autonomy	○	●	●	●	●	●	●
Primacy of human relationships in the pedagogical process	○	●	○	●	●	●	○
Transparency and explainability *Traceability, explainability and communication of how AI tools operate and make decisions*							
Disclosure and documentation of AI use in academic work	●	●	●	●	●	●	●
Openness and experimentation; fostering exploration of AI potential	○	●	●	●	●	●	●
Diversity and inclusion *Accessibility, universal design and stakeholder participation* ★ *New named requirement in EC 2026*							
Accessibility, universal design and representation	○	●	○	●	○	●	○
Fairness and non-discrimination *Avoidance of unfair bias regardless of age, gender, abilities or background*							
Bias mitigation; equitable outcomes for all learners	○	●	○	●	●	●	○
Societal and environmental wellbeing *Sustainability, social responsibility, democracy and psychosocial wellbeing*							
Impact on well-being and mental health	○	●	—	●	○	●	—

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Criterion / Dimension	ÅA	UB	TCD	JMU	UM	UU	ELTE
Sustainability and environmental impact of AI use	—	●	○	●	●	●	—
Privacy and data governance *Respect for privacy, quality and integrity of data, access to data; GDPR and AI Act compliance*							
Protection of personal, sensitive and confidential data	●	●	●	●	●	●	●
Technical robustness and safety *Resilience, cybersecurity, general safety, accuracy and reliability* ★ *New named requirement in EC 2026*							
Technically robust, safe and reliable AI use	○	○	○	○	○	●	○
Accountability *Auditability, minimisation of negative impact, trade-offs and redress* ★ *New named requirement in EC 2026*							
Accountability and responsibility for AI-generated outputs	●	●	●	●	●	●	●

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Patterns of alignment

The policies share a highly consistent framework for the ethical integration of AI, rooted in human-centricity and academic integrity.

1. Human Agency and Ultimate Responsibility

All seven institutions emphasize that AI is a tool and that humans remain solely responsible for the final academic or administrative output.

- **ELTE & TCD:** Explicitly state that ultimate responsibility for content, accuracy, and legal compliance rests in all cases with the human user.
- **UM & UB:** Mandate that the human relationship must remain at the heart of pedagogy and that AI must stay under human control and surveillance.
- **JMU:** Asserts that scientific findings must be the result of an independent "creative human achievement."
- **ÅA:** Establishes through binding regulation that academic work must represent genuine human intellectual contribution; the Procedure requires that assessment decisions demonstrate human participation in compliance with the **Act on Information Management in Public Administration**, traceable for at least five years after the decision is made (Procedure §3.3.2)..
- **UU:** Affirms in its Code of Conduct that human decision-making must remain central, with faculty Deans explicitly responsible for ensuring AI is used in ways that preserve professional accountability across the institution.

2. Mandatory Transparency and Disclosure

A core requirement across all seven policies is the obligation to declare and document the use of AI in any submitted work.

- **ELTE & JMU:** Require AI use to be indicated at the specific point of use (e.g., footnotes or code comments) and clearly marked if content was partially or fully AI-generated.
- **TCD & UB:** Stress "Transparency and Honesty," requiring clear acknowledgement and citation of the role AI played in the work.
- **UM:** Requires that the modalities of AI use be clarified in evaluation instructions and course programs.
- **ÅA:** Establishes disclosure as a formal obligation across both documents: the Regulationrequires that AI use be indicated in all scientific activities and never presented as one's own work; the Procedure specifies that researchers, teachers and students must describe which tools were used, how, and why.

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- **UU:** Provides a centrally issued Model AI Disclosure Statement, offering staff and students a practical and consistent tool for documenting AI contributions across all faculties.

3. Commitment to Academic Integrity

All seven policies treat the undisclosed or fraudulent use of AI as a serious breach of integrity, equivalent to plagiarism.

- **TCD & ELTE:** Define submitting AI-generated content as one's own work as plagiarism subject to academic misconduct procedures.
- **UB & JMU:** Specify that "deliberate manipulation" or failing to document tools in the declaration of independence leads to sanctions or rejection of work.
- **UM:** Encourages integrity through the presentation of authentic facts and original ideas alongside correct citations.
- **ÅA:** Addresses unauthorised AI use as potential cheating subject to existing disciplinary procedures; using AI tools against teacher instructions or institutional rules 'can be construed as cheating' and will be handled accordingly.
- **UU:** Addresses AI misuse as an academic integrity violation in its Code of Conduct, with Deans holding direct responsibility for upholding integrity standards within their faculties.

4. Critical Thinking and Verification

All seven institutions warn that AI is prone to errors ("hallucinations") and bias, requiring expert human verification.

- **UB & ELTE:** Note that AI lacks "authentic reasoning" and its outputs reflect biases found in training data, necessitating expert review.
- **JMU & TCD:** Emphasize developing "critical analysis ability" to check AI outputs against recognised scientific sources and primary materials.
- **UM:** Highlights the need for a "reflexive and critical posture" to address limitations and disciplinary impacts.
- **ÅA:** Requires that AI tools not be used for material whose accuracy the user cannot control; the Procedure specifies that students must carefully review all AI-generated material and ensure factual claims contain accurate, verifiable references; assessment decisions must demonstrate human participation traceable under Finnish law.
- **UU:** Promotes critical engagement with AI tools across all roles; the Code of Conduct explicitly highlights the risk of over-reliance and the importance of maintaining independent professional judgment.

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5. Privacy and Legal Compliance (GDPR)

All seven institutions mandate strict adherence to the General Data Protection Regulation (GDPR), the EU AI Act, and applicable national data protection legislation.

- **UM & UB:** Forbid the input of sensitive, nominative, or confidential data into public AI tools.
- **TCD & JMU:** Specifically warn that uploading personal or private information about students or colleagues to third-party tools is often unlawful and against university regulations.
- **ELTE:** Prohibits uploading unpublished research results ("raw data") or industrial data to external platforms.
- **ÅA:** Incorporates GDPR compliance as a binding institutional obligation within its Regulation; data protection provisions are among the most formally developed in the corpus, reflecting Finland's strong legislative tradition in information governance.
- **UU:** Addresses data governance in detail in its Code of Conduct, including provisions on deepfakes under Dutch criminal law and explicit reference to the EU AI Act as a complementary regulatory layer.

6. Equity, Fairness, and Bias Mitigation

All seven policies address the risk of AI reinforcing social inequalities or technical divides, with varying degrees of explicitness.

- **JMU & UM:** Focus on "Fairness and Equal Opportunity," noting that institutions must address the "digital divide" and ensure students are not disadvantaged by a lack of financial means or digital literacy.
- **UB & ELTE:** Mandate active monitoring for biases (cultural, gender, or social) to avoid discriminatory outcomes.
- **TCD:** Acknowledges fairness concerns in relation to equitable access to AI tools and the risk of unequal student outcomes depending on prior digital skills.
- **UU:** Addresses bias and non-discrimination within its Code of Conduct, framing responsible AI use as inseparable from broader institutional commitments to equity and inclusion.
- **ÅA:** Explicitly names fairness, equivalence and equality as governing principles but does not develop them further; the digital divide and inclusion are not addressed in either document.

7. Sustainability and Ecological Impact

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Five of the seven institutions explicitly address the environmental costs of AI use; two do not raise this dimension in their available policy documents.

- **JMU & TCD:** Note that AI is a resource-intensive technology requiring large amounts of energy and cooling water, urging a purposeful and targeted use to conserve resources.
- **UM & UB:** Promote "digital sobriety" and emotional/ecological care to minimise the environmental footprint of mass AI usage.
- **UU:** Includes sustainability considerations within its policy framework, acknowledging the environmental responsibilities associated with large-scale AI deployment in a research-intensive university.
- **ÅA & ELTE: ELTE** does not address the environmental impact of AI in its available policy documents. **ÅA** names sustainability as a governing principle but does not develop it or address environmental impact specifically.

8. Institutional Support and Training

All seven institutions provide centralised resources, tools, or training to foster AI literacy among staff and students.

- **JMU & UB:** Use specialised centres (ZBL and CRAI respectively) to offer AI tutors, workshops, and secure institutional tools such as Microsoft Copilot.
- **TCD & ELTE:** Offer dedicated "GenAI hubs" and regular training sessions for staff and students to keep pace with technological developments; ELTE additionally mandates AI literacy training for all enrolled students from semester 1 of the 2026/2027 academic year.
- **UM:** Utilises an interdisciplinary task force ("GT IA génératives") to share expertise and develop responsible usage practices across faculties.
- **ÅA:** Provides procedural guidance for teaching staff and establishes an institutional framework for responsible AI use in line with Finnish educational governance requirements.
- **UU:** Has developed a comprehensive policy ecosystem spanning its Executive Board, Faculty Boards, and academic community, including the Model AI Disclosure Statement and professional development resources aligned with the DigCompEdu framework.

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STEP 2: Comparison between university approaches on AI for Teaching and learning

In this part AI policy documents from CHARM-EU **partner institutions have been analysed comparatively**. Two partners are excluded from the analysis for they have not yet adopted a policy.

This comparative exercise aims to:

- **Understand** the diversity of approaches across partner universities
- **Identify** common principles and shared concerns
- **Establish** a minimum common framework that respects institutional autonomy
- **Develop** practical guidelines and recommended activities specifically for CHARM-EU teaching and learning contexts
- **Inform** the CHARM-EU AI strategy to be presented to the Academic Council

This collection will enable the alliance to build **a coherent approach that complements rather than conflicts with local policies**, while providing clear guidance for students and staff engaged in CHARM-EU programmes.

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Comparison's tables and methodology

The seven institutional documents were **analysed comparatively with the support of a generative AI tool**, then **verified by institutional representatives**.

Type of documents and scopes

The first comparison was structured around six dimensions, chosen to capture both the formal characteristics of each document and the substance of its provisions:

- **Type of document and year of publication**
  not all partner universities have adopted a single code of conduct or set of operational guidelines; the form chosen (binding regulation, principles, reflective document, code of conduct) is itself a finding.
- **Length and language**
  indicative of the depth of treatment and of the linguistic context in which the policy operates.
- **Scope**
  to identify whether the document covers only teaching and learning, or extends to research, assessment, administration and AI development.
- **Regulatory anchor**
  the legal, ethical and institutional references explicitly invoked or implicitly informing the document (EU AI Act, GDPR, EC ethical guidelines, UNESCO, national legislation, institutional codes).
- **Presence of principles**
  whether principles for AI use are clearly stated and structured, or implicit in the running text.
- **Update mechanism and timeframe**
  whether the document declares an explicit review cycle and on what schedule.

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Type of documents and scopes

Dimension	UB	TCD	UU	UM	ELTE	Åbo Akademi	JMU
Type of document **Year of publication**	Reflective essay / position paper 2025	College Statement; living document; 2025	AI Ethical Code of Conduct (binding) + AI Policy on the internet; The AI index; The AI responsibility matrix 2025	Code of conduct / principles 2025	Binding Rector's Order 2025	Binding Regulation + subordinate Procedure 2025	Operational guideline 2025
Length, language	≈43 pages; Catalan	8 pages; English	≈3 pages + 10 pages + extensive web pages; English / Dutch	5 pages; French	12 pages; Hungarian	5 + 5 pages; English / Swedish original	33 pp; German
Scope	Teaching & learning	Teaching & learning, Assessment, Research	Teaching & learning, Assessment, Research, Operations	Teaching & learning	Teaching & learning, Assessment	Teaching & learning, Assessment, Research	Teaching & learning, Assessment
Regulatory anchor	EU AI Regulation; Spanish Constitution; GDPR	EU AI Act; UNESCO 2023 (GenAI def.); EC Living Guidelines on GenAI in Research	EU AI Act; HLEG Trustworthy AI principles (2019); GDPR; All other relevant digital legislations and coregulation UNESCO for AI Literacy	EU AI Act; UNESCO 2023; French Commission de l'Intelligence Artificielle Report 2024;	EU AI Act; ELTE Academic Regulations for Students; ELTE Code of Ethics	EU AI Act; AI Act Art. 5/50; Tutkimuseettinen neuvottelukunta EC GenAI guidelines	EU AI Act; GDPR; German Research Foundation good research practice; Bundesministerium der Justiz KI & Urheberrecht
Presence of principles	Embedded principles within ethics and pedagogy chapters	4 named principles	Responsible AI principles (see code of conduct) based upon trustworthy AI principles EC	7 principles, each with 2–3 sub-points	10 articles + 3 annexes; ethical principles in Article 4	16 articles in Regulation; 4 sections in Procedure	3 ethical pillars

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Dimension	UB	TCD	UU	UM	ELTE	Åbo Akademi	JMU
Update mechanism and timeframe	Not specified	"*Living document, regularly reviewed and updated*"	Web updated continuously	Annual review and annual report	Not specified	Reviewed by General Counsel; review date stated	Annual updates planned until 2030; AI advisory board envisaged

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Guiding principles and values

The comparison **narrows the focus to six ethical dimensions identified,** explicitly, in the partner documents. The aim was to assess, for each dimension, whether it is addressed at all and, if so, how:

- **Transparency and disclosure**
  whether and how the use of AI must be declared in staff and student work, and whether ready-to-use templates or model statements are provided.
- **Responsibility and accountability**
  who is responsible for content produced with the help of AI: the user, the supervisor, the institution?
- **Sustainability and environmental cost**
  whether the ecological impact of AI use is mentioned explicitly, implicitly, or not at all.
- **Equity, inclusion and digital divide**
  whether inclusion and the technological gap are named, and whether concrete measures are declared.
- **Human relationship in education**
  whether the document affirms the centrality of the human relationship in teaching and learning, in principle or in operational terms.
- **Big Tech and digital sovereignty**
  whether this concern (central to the CHARM-UP proposal for 2027–2028) is already addressed in the document.

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Guiding principles and values - table

Dimension	UB (ES)	TCD (IE)	UU (NL)	ELTE (HU)	UM (FR)	Åbo Akademi (FI)	JMU (DE)
Transparency & disclosure	Mandatory; declarative statement at end of activities	Mandatory; citation includes date, tool, prompt; long verbatim considered poor practice	Mandatory; Model AI Disclosure Statement provided centrally Part of the code of conduct	Mandatory; faculty-defined AI-use declaration	Mandatory; explicited in course outlines and assessment instructions (Principle 6)	Mandatory; described in publications, theses, examinations	Mandatory; reflection chapter ≥ 10% of work + prompt documentation
Responsibility & accountability	Author/creator responsible; AI cannot be author or held accountable	Students/staff fact-check AI outputs; plagiarism = academic misconduct	Personal responsibility for AI-generated content; clear governance AI matrix defines the accountability in teaching. AI index in learning	Student bears risk of unprofessional/uncritical use; AI cannot be listed as author; AI cannot assume responsibility	Explicit: Principle 5 : person using AI is accountable for validity, legal and ethical implications	User responsible for content; AI not an author; researcher carries reliability of results	Differentiated: institution / teachers / examination offices / students each bear responsibilities
Sustainability / environmental cost	Explicit: ecological/environmental impact of LLMs	Mentioned briefly under Innovation principle and concerns	Explicit: SDGs alignment; do-no-harm principle	Not addressed	Explicit: Principle 5 references to internal strategy for sustainability	Named as a governing principle (Regulation §5); not developed further	Sustainability ethics is the first ethical principle
Equity, inclusion, digital divide	Discussed under ethics and access; bias awareness	Implicit; cited under Respect principle	Explicit: principle 6 (diversity, non-discriminatory, fair); accessibility	Implicit; explicit on cultural, social, methodological biases (Article 4.2)	Explicit: Principle 4: caution, critical mind, inclusivity	Not centrally addressed	Explicit: financial / technical access, disciplinary differences, transition phase
Human relationship in education	Implicit; emphasises ethical culture	Implicit	Explicit; through “agency” framing (AI does not	Implicit; Article 3.2: AI must complement, not replace	Explicit and prioritised: Principle 1 “Priority to the human relationship”	Implicit	Implicit; teacher–student trust risk addressed

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			replace staff; protects digital sovereignty)				
Big Tech / digital sovereignty	Not addressed	Not addressed	Explicit: Big Tech and geopolitical influences named as threats AI systems and tools are selected on the basis of Responsible AI, no vendor lock in, no Big Tech AI providers	Not addressed	Not addressed	Not addressed	Mentioned in passing (privacy of providers)

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Focus on: principles and values

Some aspects are **universal across the policies**:

- **Transparency and disclosure** of AI use.
- **Human responsibility and accountability** for any output, including the impossibility of attributing authorship to an AI tool.
- **Critical engagement with AI outputs** as verification, factchecking, awareness of hallucinations, etc….
- **Respect for personal data**, GDPR **and intellectual property**.
- Encouragement of **pedagogical experimentation** under teacher discretion.
- **AI literacy as a learning outcome** of higher education.

Other principles are present in some policies and absent or implicit in others:

- **Sustainability and environmental cost**: explicit in Montpellier, Barcelona, JMU and Utrecht; named as a governing principle but not developed in Åbo Akademi; briefly mentioned in Trinity; absent in ELTE
- **Equity, inclusion and the digital divide**: explicit in Montpellier, Barcelona, JMU and Utrecht; treated briefly in Åbo Akademi and Trinity.
- **The centrality of the human relationship in education**: explicit in Montpellier and Utrecht (the "agency" framing); implicit in the others.
- **Big Tech / digital sovereignty concerns**: explicit only in Utrecht.

For CHARM-EU the alliance wants common principles to remain focused on AI use in teaching and learning but **including the alliance values and educational principles** (e.g. sustainability, inclusion, etc.)

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Focus on: Disclosure mechanisms

Disclosure of AI use is the ethical principle on which **all seven analysed policies converge,** but the **form** of that disclosure varies considerably from one partner to another:

- **MODEL TEXT**
  Only three (Utrecht, ELTE, Barcelona) **provide a model text or minimum content**. The other four leave the form to faculty or course discretion.
- **AI AUTORSHIP**
  All documents states that **AI cannot be cited as an author or as a source**. AI tools are documented under "tools" or "methods", never under "references" or "authors".
- **FINAL RESPONSIBILITY**
  Disclosure does not transfer responsibility. At all seven institutions, the human user remains responsible for the accuracy, lawfulness and ethical implications of the work.

Three approaches emerge across the seven partner documents:

1. **Declarative statement**
   A short, structured text at the start or end of the work, declaring which AI tools were used, for what purpose, and confirming responsibility. **This is the most common approach**. Universiteit Utrecht has formalised it through a centrally-issued **Model AI Disclosure Statement**; Universitat de Barcelona proposes a model declaration to be included in course outlines; ELTE Budapest specifies minimum content in its **Annex I** (purpose and methods, creative cooperation process, tools used, statement of lawful use).
2. **Reflective documentation**
   A longer section in which the student or researcher reflects on *how* AI shaped the work (what was used, when, why, what was kept or rejected, what limitations were encountered). JMU Würzburg is the most prescriptive: it mandates a reflection chapter of **at least 10% of the work's volume**, accompanied by a digital folder of prompts and outputs. ELTE Budapest requires a "reflective demonstration of understanding" alongside its formal declaration.
3. **Citation-style reference**
   AI use treated as a source: cited at the point of use, with date, tool, version and prompt. Trinity College Dublin's Library has produced a referencing guide for this purpose; long verbatim quotes from AI are explicitly considered poor practice even when cited. Universiteit Utrecht has indicated how to cite in their AI index policy.
4.

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Other universities have a similar mechanism: **course-level disclosure rules** (Université de Montpellier, Trinity programme handbooks), under which **the teacher specifies what is allowed** before the student declares anything.

Examples

Minimal statement (e.g. for a coursework essay or short assignment):

In preparing this work, I used Microsoft Copilot (December 2025) for language editing of sections 2 and 4. All content has been reviewed and verified against primary sources. I take full responsibility for the final text.

Structured declaration (e.g. for a thesis, portfolio or substantial project, modelled on the ELTE Annex I minimum content):

AI tools used: *ChatGPT (OpenAI, GPT-4, accessed February–April 2026).*
Purpose: *brainstorming the literature review structure (§2); generating draft phrasings for the methodology section (§3); checking grammar and style throughout.*
Creative cooperation process: *prompts were iteratively refined; outputs were used as a starting point and rewritten in the author's voice; methodological choices and conclusions are the author's own.*
Statement of lawful use: *I confirm that the use of AI in this work complies with the Academic Regulations and the relevant institutional rules; that no personal or confidential data was submitted to the AI tools; and that no AI-generated content has been presented as my own intellectual work.*

A third level, the JMU-style **reflection chapter**, **extends the structured declaration into a substantive reflexive text**, typically several pages, that documents the dialogue between the author and the AI tool. This format is best suited to dissertations, master's and doctoral work; for shorter assignments, the structured declaration above is sufficient.

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STEP 3: Defining guiding principles for CHARM-EU

Building on the convergences identified in CHARM's partners internal policies/guidelines and on the alignment with the European Commission's 2022/2026 ethical framework, the following draft set of guiding principles is proposed for discussion within CHARM-EU.

The scope of them is the design and blueprint of new joint programmes supported by the CHARM-EU Academic Council or CHARM-EU funded activities.

These guidelines **do not override any partner's institutional policy or guidelines** over the use of AI in teaching and learning. They serve as **a means for discursive alignment across CHARM-EU institutions** where joint programmes are being developed.

Principle 1: Centrality of the human relationship, wellbeing and institutional agency

Education at CHARM-EU is grounded in human relationships between teachers, learners and researchers. **AI is a tool in the service of that relationship; it does not substitute for it**. The use of AI takes account of its impact on the wellbeing of students and staff. The alliance maintain agency over how AI is deployed in their teaching, learning and assessment, in line with European democratic and academic values.

Partner policies connection and EC ethical framework

This principle synthesises Université de Montpellier's explicit Principle 1 ("Priority to the human relationship") and Universiteit Utrecht's framing of institutional "agency" over AI; it incorporates the wellbeing dimension drawn from JMU Würzburg's explicit attention to teacher–student trust and from Universitat de Barcelona's emphasis on emotional care. ELTE reinforces the principle in another register, requiring that AI complement, not replace, human creativity, decision-making and analytical skills (Article 3.2).

The principle maps many of the European Commission's approaches: human dignity, trust/trustworthiness, human agency and oversight, and societal and environmental wellbeing.

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Principle 2: Transparency and disclosure

The use of AI in teaching and learning practice is disclosed accurately and proportionately. Students disclose AI use in submitted work; teachers disclose AI use in materials and assessments.
Disclosure examples are developed in CHARM-EU Teaching guidelines over the use of AI.

Partner policies connection and EC ethical framework

Transparency is universal across the seven analysed policies and is a cornerstone of the European Commission's 2022/2026 Guidelines (Trust and trustworthiness).

Concrete disclosure mechanisms vary across partners.

Principle 3: Human responsibility, accountability and justified choice

The **human user is responsible for all content produced with the help of AI**, for its accuracy, its lawfulness and its ethical implications. AI tools cannot be authors and cannot be cited as sources. Decisions taken in the context of teaching, assessment and admission remain the responsibility of named natural persons.

Partner policies connection and EC ethical framework

All analysed policies converge on human responsibility. Åbo Akademi, JMU, Barcelona and ELTE are explicit that AI cannot be cited as a source or treated as an author

The "justified choice" dimension, present in the EC framework is explicit here.

Principle 4: Critical engagement and AI literacy

AI outputs are subject to critical evaluation by the user.
Students and teachers at CHARM-EU are entitled to develop AI literacy as part of their education and professional development.

AI literacy includes technical understanding, ethical awareness, the capacity to question AI outputs, and informed engagement with the opportunities and risks of AI.

Partner policies connection and EC ethical framework

AI literacy as a learning outcome appears across all seven policies.

The European AI Act (Article 4) introduces an **explicit obligation regarding AI literacy** and provides the definition referred to in the principle's text.

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Principle 5: Equity, inclusion, fundamental rights and technical robustness

The use of AI in teaching and learning at CHARM-EU does not introduce or amplify inequalities. Access to relevant tools is provided institutionally where possible. Personal data, privacy, confidentiality and intellectual property are protected in accordance with EU and national law (in particular GDPR and the EU AI Act).

Bias in AI outputs is acknowledged and mitigated.

AI tools deployed in teaching and learning are technically robust and safe; deepfakes and similar manipulative uses are not permitted.

Partner policies connection and EC ethical framework

Equity is explicit in Université de Montpellier (Principle 4), JMU (financial and technical access), Universitat de Barcelona (access and bias awareness, with grounding in Spanish constitutional rights) and Universiteit Utrecht (HLEG diversity principle).

ELTE is explicit on bias mitigation, naming cultural, social and methodological perspectives and requiring counter-checking and inclusion of diverse sources.

Åbo Akademi states that students may not be required to register with external services for examinations.

Utrecht refers explicitly to the Dutch criminal-law prohibition of deepfakes (WvSr Art. 139h/254ba).

The technical robustness dimension present in the EC framework is incorporated here.

Principle 6: Sustainability

The environmental cost of AI use is acknowledged. Alliance partners adopt practices of digital sobriety: AI is used purposefully and not by default.

Partner policies connection and EC ethical framework

Sustainability is one of the educational principles of CHARM-EU, this aspect is present in many of the partners documents.

The European Commission's 2022/2026 Guidelines invite educators to consider the environmental cost of AI explicitly.

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Principle 7: Pedagogical innovation, institutional support and academic integrity

Partners encourage pedagogical experimentation with AI under teacher discretion, while protecting the integrity of teaching and assessment.

Each partner provides institutional support, training, resources, guidance, communities of practice, to enable that experimentation.

Partner policies connection and EC ethical framework

All seven policies pair encouragement with integrity and recognise the limits of detection tools.

The European Commission's 2022/2026 Guidelines emphasise institutional support (provision of tools, regular reviews, resources and guidance, sharing and collaboration, training, teaching support, project funding) as a transversal condition for ethical AI use.

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AI use disclosure

The authors acknowledge the use of **NotebookLM** and **Claude** (from January 2026 to April 2026) for **supporting the comparative analysis of partner AI policies, translation of original documents and structuring of chapter content**. The purpose of its use was **to accelerate the synthesis of seven institutional documents into a coherent comparative framework, to verify alignment with the European Commission's 2022/2026 ethical guidelines, and to support the formulation of common principles for CHARM-EU**.

All AI-assisted text was reviewed and revised by the authors, validated by institutional representatives, and the authors take full responsibility for the accuracy and integrity of the work. No personal data or confidential information was submitted to the AI tools, and no AI-generated content has been presented as the author's intellectual work.

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