ALMA MATER STUDIORUM
UNIVERSITÀ DI BOLOGNA

University Policy for an Ethical and Responsible Use of Generative Artificial Intelligence in administrative and management activities

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Introduction

This policy aims to promote a strategic vision for the use of generative artificial intelligence tools in the University's administrative and management activities, including communication activities and the activities supporting research, teaching and third mission, which form an integral part thereof. The objective is to define transparent criteria on what the University considers to be appropriate or inappropriate use of artificial intelligence in these contexts.

The objective is to promote and encourage the adoption of artificial intelligence by all professional staff, laboratory technicians, CEL and lecturers – by fostering its informed, effective and responsible use. This also implies recognising limits and potential risks, in full compliance with current regulations, including the latest ones. In particular, Article 11 of Law no. 132 of 23 September 2025 states that artificial intelligence must be used to improve working conditions and protect the physical and mental integrity of workers; its use must therefore be safe, reliable, transparent and always consistent with human dignity.

Opportunities

Generative artificial intelligence (GenAI) refers to those artificial intelligence algorithms capable of automatically producing content, for example in the form of text, images, code, audio and video.

The use of such tools can represent a real opportunity in administration and management, helping to increase efficiency. GenAI can improve the processing and analysis of management data, also in support of administrative integrity, fostering transparency and the adoption of corruption prevention measures. Due to advanced language models and predictive algorithms, GenAI is capable of analysing large volumes of contractual, financial and documentary data, detecting suspicious patterns or process anomalies. This enables us to strengthen the monitoring systems and help ensure greater transparency.

It can help manage repetitive tasks, generate ideas, optimise workflows and support activities to improve the efficiency of work processes aimed at complying with established rules and obligations. However, the human contribution remains essential, above all in terms of knowledge and the ability to exercise critical judgement.

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Risks and critical issues

The use of GenAI involves some significant risks related to the opacity of algorithmic mechanisms, the quality of training data and ethical and privacy issues. The algorithms used can actually make errors or amplify existing ones, producing inaccurate or incomplete information that generates undesirable and potentially harmful situations.

A further risk is the possibility that GenAI may accentuate distortions already present in the data or introduce new ones, with negative consequences for the output. The phenomenon of so-called *"hallucinations"* is particularly critical, namely the production of misleading or completely false content: information that, although appearing plausible, has no basis in reality or in the available data. The use of such results constitutes a significant risk, especially in administration and management, where accuracy and reliability are essential requirements.

Also in light of the fact that, pursuant to Article 11 of Law no. 132/2025, the use of artificial intelligence in the workplace must be safe, reliable and transparent in compliance with the information obligations laid down by law and cannot be carried out in a way that is contrary to human dignity or violate the confidentiality of personal data, while guaranteeing the observance of workers' inviolable rights without discrimination, it is essential to critically assess the inputs and subject the outputs of GenAI to constant checks, avoiding their uncritical acceptance in work activities.
Particular attention must also be paid to the use of GenAI in institutional communication.

Institutional communication includes activities that build, maintain and develop the University's public image, convey strategic messages, and inform and engage the University community and society through:

- University websites
- Press releases and media relations
- Official social media channels
- Newsletters and institutional emails
- Institutional documents and presentations of the University (brochures, financial statements)
- Promotion of official events and ceremonies

The use of GenAI may entail reputational risks (content perceived as artificial, standardised or inaccurate), operational risks (lack of editorial control), accountability risks (weakening of authorial responsibility) and ethical risks (bias, privacy violations).

To reduce risks, the use of GenAI must always be consistent not only with the regulations in force but also with the distinctive values and communication strategy of the University, paying attention to enhancing authenticity and transparency, as well as assessing the context, methods and specific objectives of each communication activity.

Ethics and regulatory framework

The policy is based on respect for the fundamental values of the University, the rights of individuals and current regulations, including the Statute, the Code of Ethics and Conduct, national legislation and key European guidelines such as the Charter of Fundamental Rights of the European Union, the European Declaration on Digital Rights and Principles for the Digital Decade, the Ethics Guidelines for Trustworthy AI developed by the AI HLEG, Regulation (EU) 2024/1689 of the European Parliament and of the Council of 13 June 2024 (AI Act), Law no. 132 of 23 September 2025 containing provisions and delegations to the Government on artificial intelligence, other sector-specific provisions (e.g. Legislative Decree no. 152 of 1997 on employment relations), as well as the AGID Guidelines on the Use of Artificial Intelligence in the Public Administration.

In particular, the policy makes reference to some fundamental concepts of the European Regulations concerning risk assessment and the definition of roles and responsibilities. The AI Act distinguishes four levels of risk of AI systems for people's health, safety and fundamental rights:

- **Unacceptable risk**: systems prohibited because they are contrary to fundamental values, for example forms of cognitive-behavioural manipulation, classification of people based on behaviour (social scoring), real-time biometric recognition in public spaces (except for strictly limited exceptions).
- **High risk**: systems requiring stringent obligations in terms of transparency, data management, technical documentation, risk assessment and mitigation, as they impact fundamental rights,

security or access to essential services, such as tools for recruitment and performance evaluation, access to educational programmes, dispute or complaint management.

- **Limited risk**: systems that present potential risks and for which the regulations mainly provide for transparency obligations (for example, chatbots that must declare themselves as AI to users or deepfake generation systems).
- **Minimal or no risk**: systems that do not present significant risks and are not subject to specific requirements.

The AI Act also introduces a transversal category: systemic risk models and General Purpose AI (GPAI) Models, i.e. wide-ranging systems, such as generative language models, that can be integrated into a plurality of applications and have their own obligations, in particular with regard to technical documentation, transparency, copyright protection and safety management.

The Regulations distinguish two fundamental roles in the development and deployment of AI systems, establishing their respective obligations. Providers are those who develop or commission the development of an AI system or GPAI model, place it on the market or implement it under their own name or brand. Deployers are the entities that use an AI system, possibly integrating it into their own processes or applications, without, however, substantially altering its operation. If, on the other hand, the system is significantly modified or marketed under their own name or trademark, the deployer shall assume all the responsibilities of the provider.

Policy objectives

In line with its vocation for innovation and the quality of administrative action, Alma Mater Studiorum - Università di Bologna recognises Generative AI (GenAI) as a tool that can contribute to improving organisation and supporting the performance of activities, while simultaneously guaranteeing the observance of the inviolable rights of workers without any discrimination.

The adoption of the Policy also fits within the framework of the principles of integrity, consistency and transparency that guide the University, contributing to consolidating an administrative model based on accountability, traceability and the quality of public decisions.

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This policy sets out the principles and guidelines through which the University promotes the effective and transparent adoption of GenAI in administrative and management activities, including institutional communication, guided by criteria of accountability, fairness, traceability and the protection of individuals and the environment.

Communication activities connected to teaching activities and individual research by teaching and research staff fall within the scope of academic and scientific communication. For these, please refer to the University Policy for an Ethical and Responsible Use of Generative Artificial Intelligence in teaching and research activities.

Target

This Policy focuses on the use of GenAI tools by the University as a deployer, and by the people and entities who, in various capacities, take part in the University's administrative and management processes and activities, including institutional communication activities.
In particular, it is aimed at:

- Professional Staff, CEL and Library Staff carrying out administrative and management, organisational, legal, IT, accounting, strategic support and communication activities for the University;
- Teaching and research staff when carrying out administrative, procedural and communication activities connected with their institutional roles and responsibilities, whether formalised by ad hoc acts of designation or not formalised;
- Collaborators, consultants, contractors' staff, personnel of bodies and institutional partners, and any other external parties involved in activities within administration and management.

Principles

In compliance with national and international regulations, the University sets out the following fundamental **principles** for the responsible use of GenAI in administration and management:

- **Centrality of the human being**, understood as active supervision and critical thinking, in order to use GenAI as a supporting tool that enhances the user's personal intuition, creativity, judgement

and decision-making, without ever replacing them. Therefore, GenAI systems must be used in a way that makes the individual an active part of the administrative decision-making process and institutional communication activities.

- **Transparency** as a commitment to ensuring that the GenAI systems adopted, and the decisions and processes resulting from them, are made known, understandable, explainable and traceable, together with the potential impacts of their use in the various fields of application.
- **Accountability**, understood as the assumption of responsibility by those using GenAI. It implies the ability to account for the results generated, which must always be subject to active supervision and critical evaluation. Individuals remain fully responsible for both the methods of using GenAI and the outputs generated. Therefore, the University does not consider the complete delegation of activities or responsibilities to generative artificial intelligence systems to be acceptable.
- **Accuracy**, understood as the commitment to adopting verification procedures that are adequate for the use case and in compliance with ethical guidelines and applicable regulations, both for the GenAI systems employed and for the results obtained using GenAI solutions, with awareness of the risks and ensuring that people do not uncritically accept the outputs generated by GenAI during their work;
- **Respect for rights, society and the environment**, understood as protection of the dignity of individuals and workers, including protection of their privacy and rights, the prohibition of discrimination, the safeguarding of intellectual property rights relating both to information used in systems and to outputs generated with GenAI tools, as well as adherence to the values of fairness, inclusion and environmental sustainability.

Responsibilities

Alma Mater Studiorum - Università di Bologna, in line with national and international regulations, identifies specific responsibilities to foster the correct, accountable and ethical use of GenAI in administration and management, including institutional communication.

Responsibilities of the University

The University, in the role of deployer, is responsible for:

- **Structurally and coherently managing the adoption of GenAI tools**, ensuring compliance with sustainability, safety, legality, ethics and regulatory requirements, in close coordination with the University's Digital Transition Officer (DTO) and with the involvement of the University's Data Protection Officer (DPO);
- **Establishing processes and practices for information as well as technical, ethical and legal verification** that ensure that the use of GenAI and the GenAI solutions adopted are aligned with regulatory, ethical and safety standards;
- **Establishing specific procedures for the processing of data used by GenAI solutions** that ensure sustainable and responsible data management in compliance with national and European personal data protection regulations. This includes using high-quality, reliable and up-to-date data; defining clear policies for access, use and storage; and adopting technical and organisational measures to ensure the integrity and security of institutional data;
- **Adopting appropriate risk management policies by conducting a thorough analysis of the risks** associated with deploying GenAI systems in order to prevent violations of fundamental rights or other resulting harm;
- **Supporting the recipients of this Policy in assessing the impact of decisions made** with the aid of GenAI systems, compared with those made using traditional methods, while simultaneously providing useful information to describe the potential effects of employing such solutions in different application areas.
- **Training staff** by promoting digital literacy and organising continuing education initiatives on GenAI (for example on GenAI systems and tools adopted or in the process of being adopted, on informed use, prompt writing, output verification, risks and limitations), in connection with the anti-corruption and transparency training programmes active within the University.
- **Ensuring that adopted GenAI systems are accessible to and usable** by people who require assistive technologies or specific configurations;

- **Establishing collective governance and control bodies**, where deemed appropriate, with responsibilities for monitoring, oversight and making recommendations on the responsible use of GenAI;
- **Making available, in clear and non-technical language, the list of GenAI solutions in use or being acquired**, specifying their functions, areas of application, modes and limits of use, and keeping it updated in relation to any regulatory developments to ensure full compliance with current regulations.
- **Reducing environmental impact** by carefully selecting the GenAI systems to be adopted and assessing their effects in terms of sustainability;
- **Promoting the distribution of the policy** by preparing operational and communication tools that facilitate its full understanding and application by all personnel involved.

Personal responsibilities

The use of generative artificial intelligence tools in administrative and managerial activities, including institutional communication and support for research, teaching and third mission activities, entails specific responsibilities for each individual.

The necessary actions to be taken are listed below:

- **Use authorised GenAI tools or those provided by the University** to ensure compliance with safety standards, technical and regulatory requirements, and data integrity;
- **Consult the Digital Transition Officer (DTO) in advance regarding any GenAI tools** that are not yet authorised or are not included in the institutional provision, in order to enable their assessment, particularly in cases of critical or high-risk use;
- **Do not use GenAI for activities classified as high risk by the AI Act** until a comprehensive regulatory framework has been defined that allows its use in full compliance with individual and collective rights to information, and with the prior formal approval of the Digital Transition Officer (DTO);

- **Take environmental impacts into account when using GenAI tools**, given the significant amount of energy required for training and for performing tasks;
- **Use GenAI tools in accordance with the purposes for which they were adopted**, being aware of their main characteristics and of the limits that may affect the accuracy and reproducibility of the output. In particular, the probabilistic nature of models can generate results that are not always replicable: for this reason, it is necessary to adopt appropriate mitigation measures, such as verifying primary sources and critically supervising the output.
- **Comply with the terms of use and limits on the use of the GenAI tools** made available by the **University**;
- **Review and validate the outputs produced with GenAI**, clearly assuming personal responsibility for them in accordance with current legislation;
- **Check the accuracy of the GenAI output** in order to identify and correct any potential errors, including factual inaccuracies, logical fallacies, or inappropriate or potentially offensive language;
- **Be aware that the GenAI system is not a legal person** and cannot be held responsible or considered an author/co-author of the generated output: anyone using GenAI is responsible for the accuracy and consistency of the output and for any plagiarism;
- **Be aware that the GenAI output may infringe copyright law**, because it may rely on copyrighted material used without permission;
- **Check that the GenAI content properly cites sources** and provides references or other appropriate details about the information used.
- **Check the institutional communications guidelines** before publishing content generated with GenAI tools;
- **Be aware of the need to verify not only the accuracy of the content produced by GenAI**, but also that the style, language and tone are appropriate to the context and fully consistent with the principles and identity of institutional communication;

- **Be mindful of synthetic data**, i.e. data generated by GenAI based on examples or text descriptions, rather than real-world sampling, making sure that the synthetic nature of such data is explicitly stated in its processing and that testing measures are in place to check that results based on synthetic data are reasonably meaningful in the real world;
- **Refrain from providing personal data of third parties, including special categories of data such as health or genetic data**, unless the data subject gives their consent or another suitable legal basis for the processing exists.

The use of GenAI tools that are not provided for or authorised within the University's resources is strongly discouraged. Responsibility for any use of unauthorised tools rests entirely with the person who uses them.

The University is committed to keeping this Policy up-to-date through monitoring and periodic evaluation of the Policy and of the tools adopted, taking into account technological and regulatory developments at national and international level, and any new needs that may emerge from the academic community. At national level, the University is awaiting any further guidelines issued by AgID and the competent Ministries for the definition of operational tools and implementation indicators relating to the use of artificial intelligence in the Public Administration.

The aim is to ensure that the indications in the Policy effectively respond to changes, promoting a use of GenAI that is safe, inclusive and in line with the expectations of those who live and work within the University.