



TOWARDS NATIONAL STANDARDS: COMPARATIVE ANALYSIS OF AI GOVERNANCE MODELS IN PHILIPPINE HIGHER EDUCATION

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ABSTRACT

Currently, there is no existing guideline or policy from the Commission on Higher Education (CHED) as to how Higher Education Institutions (HEIs) in the Philippines should regulate the use of artificial intelligence (AI) in academic settings. This lack of a national guideline prompted universities to come up with their own approaches to regulation, characterized as “soft,” “hybrid,” to “hard” regulatory mechanisms. The researcher puts forward that a productive starting point in formulating a nationally-accepted guideline is to discuss and consolidate these existing efforts. It is in this sense that the researcher comparatively analyzed publicly available guidelines and policies on AI use from eight (8) leading Philippine universities. Using document review and thematic analysis, the researcher shows that there is emerging consensus on the principles of ethical AI use; however, their approaches to regulation differ based on form, guideline, accountability measures, and risk management mechanisms. This paper found that some universities preferred discussing AI ethics by flexibly laying broad ethical principles; some guidelines are “recommendatory but strict in tone”; or employs “faith-based approach,” “competency-centric,” “policy-oriented,” “hard regulation,” among other descriptions to their approaches. These empirical descriptions add to the body of literature concerning AI governance which, as Birkstedt et al. (2021) observed, remains fragmented. It is the hope of the researcher that this can lend insights to how other HEIs would craft their own AI guidelines and ultimately, inform the formulation of a robust national guideline on ethical AI use in education.

Keywords: *AI Governance models; CHED guidelines AI; Philippine universities AI regulation; AI policies Philippines*

INTRODUCTION

Artificial intelligence has been generally regarded as the ability of a computer or a computer-controlled machine to perform tasks akin to human's higher mental processes. This includes reasoning, inference, generalization, and learning from past experiences, which are generally assumed to be human-specific qualities (Keles & Aydin, 2021). How artificial intelligence impacts the education sector has been the site of study in several literature. But as Zawacki-Richter et al. (2019) notes, it is still unclear how educators maximize its pedagogical advantage while safeguarding against ethical abuses.

In the Philippines, the discourse on AI and education have been going on in academic circles for quite a long time now. However, it was not until recently that it has gained public attention, particularly the ethical dimension of using AI in the educational process. This came after an undergraduate student from the country's top university was caught utilizing the use of AI to write his academic paper as a requirement for his course (Untalan, 2023). This has hit the headlines and flooded national newspapers, prompting top university officials to probe into the incident as well as further discuss the ethical implications of this on the country's educational practice.

Fears on the use of AI for academic purposes are well-grounded. Khare et al., (2018) said the biggest fear of educators is that AI will outsmart its own creators, hence allowing AIs to actually program human behavior. Educators worry that overreliance on AI may jeopardize the students' capacity for independent learning and self-reliance, creatively solve problems, and think critically (Seo et al., 2021). AI may also undermine the expression of human agency and the capacity of humans to make authentic choices (Legaspi et al., 2024), including those related to their academic requirements.

Conversely, the acceleration of what AIs can do also provide advantages in the educational sector. For instance, AI saves time in answering simple and repetitive questions (Seo et al., 2021). In fact, AI is already widely used by educators and learners alike nowadays through the utilization of intelligent tutoring systems, teaching robots, and adaptive learning systems (Chen et al., 2020). Several empirical studies have also shown the acceptability of AI use among students as in the study of Sumakul et al. (2022).

It is important to note, however, that ethical conversations on AI, or as Green et al. (2022) calls as the "AI ethics discourse" needs further unpacking especially that globally, no framework, guidelines, policies, nor regulations have been agreed upon to address the ethical issues raised by the use of AI in education. In the Philippines, neither the Commission on Higher Education nor the Department of Education have issued a memorandum on ethical guidelines on the use of artificial intelligence. Hence, there is now a resounding call to adopt ethical guidelines for the use of AI in Philippine education (Chua et al., 2023).

AI Guidelines across the world

While there is no specific ethical guideline in the Philippines on the use of AI for academic work, there are general ethical guidelines and principles for the use of AI that can be applied in the academic context and can be adopted or considered by CHED in the formulation of ethical guidelines.

An example of this is the Asilomar AI Principles, which were developed by a group of AI researchers and industry leaders in 2017. The draft recommendation by UNESCO published in March 2021 is also widely recognized. Striking provisions in this document include the role of AI to enhance—rather than replace—human teachers and maintains that the utilization of AI should promote inclusion and diversity (UNESCO, 2021).

Emphasizing transparency, accountability, and human oversight, the IEEE Global Initiative on Ethics of Autonomous and Intelligent Systems has also issued a set of guidelines and principles for ethical use of AI, including in education (IEEE, 2021). On a similar note, the European Commission (2019) also released guidelines, which recommends education and training, among others. It similarly echoes the principle that AI should be adapted to support rather than replace human teachers and learners.

The problem with these set of ethical guidelines is that they are not context-specific to the Philippine educational system; hence, while these global standards are informative, they cannot be arbitrarily adopted in the national setting. As scholar Birkstedt et al. (2021) points out, context is important in AI governance. It is also important to note that as per the Generative AI Global Interest Report 2023, the Philippines has “the highest monthly search volume for AI tools overall: 5.052 per 100,000 population, mostly for text AI” (Rogerson et al., 2022). The large extent to which Filipinos use AI is concerning and appeals for greater sense of urgency.

AI Governance Models

Such need for a nationally-designed guideline on AI regulation falls within the specific discourse of AI Governance. As Wu et al. (2024) succinctly defined, AI governance are frameworks, policies, and practices designed to ensure that AI systems align with ethical principles, legal requirements, and societal values. This involves establishing guidelines for responsible AI use, accountability mechanisms, and risk management strategies. It must be clear, however, that there is no standard way of AI governance especially that literature pertaining to this area of research remains fragmented as universities still come up with varying approaches in regulation and implementation (Birkstedt et al., 2021).

Nevertheless, there are available models in the literature that could guide the formulation of AI governance structures in universities. One of which is the Hourglass Model of Organizational AI Governance posited by Huriye (2023). Insofar as this model is concerned, three levels have to be met: (1) environmental governance, which pertains to macro-level policies and societal norms; (2) organizational governance, referring to

institutional policies and ethical guidelines; and (3) AI system governance, which deals specifically with technical implementation and accountability structures. In essence, Wu et al. (2024) explained that the logic behind this governance model is simply to link broad ethical principles to specific operational practices.

The AI governance model by Molina-Carmona & Garcia-Penalvo (2025), meanwhile, foregrounds that AI governance models must adhere to three principles. On top of this is the principle of legality or compliance with existing laws and regulations. Neutrality is the second principle stressed by Molina-Carmona & Garcia-Penalvo (2025), driving emphasis on avoiding bias in AI systems. The third principle is transparency which mandates clear disclosure as to the extent of AI use. And finally, promotion of innovation or encouraging responsible experimentation, also needs to be observed.

Another notable model is that of Chan (2023) dubbed the AI Ecological Education Policy Framework. In his work, Chan (2023) structured AI governance into three dimensions. First is the pedagogical dimension which drives focus on the integration of AI to enhance teaching and learning while at the same time developing AI literacy and ethical engagement. The second one is the governance dimension, which primarily deals with accountability structures, fairness, and data privacy. Lastly, the operational dimension particularly deals with practical implementation, including infrastructure, teacher training, and AI adoption.

It is also important to discuss that there are emerging trends in AI governance literature with respect to the role of faculty in governing AI regulation. Wang et al. (2021) called this “professors’ academic governance” whereby decision-making is generally decentralized as professors are given the authority to regulate AI use in their respective courses. But while deregulated on one hand, the university remains to have institutional oversight as there are structures for instance to escalate faculty determination of AI ethics violations to higher administrative authorities.

Despite much emphasis on administrative roles in AI governance literature, there is also an increasing trend on a more liberal approach to regulating AI use in universities. The work of Wu et al. (2024) is testament to this where universities higher education institutions would often prefer non-binding, educational guidelines rather than strict prohibitions to govern AI use. In their empirical study, they noted trends such as the flexible guidance model where the framework is rather geared towards adapting AI to the institution’s technological and pedagogical needs. There is also an increasing use of what they termed as “Socratic questioning” model where instead of imposing prohibitions, universities would rather pose questions to encourage dialogue and critical reflections. Wu et al. (2024) have also discussed community engagement where stakeholders of the university—especially the students, faculty, and administration—jointly consult each other in the formulation of AI policies in accordance to their particular needs and contexts.

Research Questions

Anchored on the need to scale up national guidelines on AI use in the education sector, the researcher puts forth that existing efforts in the country in formulating guidelines and policies must first be examined and analyzed as basis for developing a comprehensive, context-sensitive framework of regulating AI-driven tools in learning environments. At present, these efforts are mostly visible from universities which formulated their own guidelines and policies. Hence, this study will address the following research questions:

1. What Philippine universities have publicized their own guidelines and policies in AI use regulation?
2. What AI regulatory approaches have they undertaken?
3. How are these regulatory approaches described in terms of:
 - a. Form
 - b. Guidelines
 - c. Accountability mechanisms
 - d. Risk management processes?
4. How do these regulatory approaches contribute in AI Governance literature?
5. What insights can be drawn from these approaches in developing national guidelines in AI use regulation in education?

METHODOLOGY

In this study, the researcher made use of a qualitative document analysis approach to examine how leading Philippine universities govern the use of artificial intelligence in academic settings. The main focus was on publicly available AI guidelines and policies from eight leading higher educational institutions: the University of the Philippines (UP) system, University of the Philippines Open University (UPOU), University of the Philippines Los Baños (UPLB) Graduate School, Ateneo de Manila University (ADMU), De La Salle University (DLSU), De La Salle University-Benilde, Mindanao State University (MSU), and Far Eastern University (FEU). In searching for these guidelines, the researcher conducted a general broad strategy, looking into news reports and university websites, among other sources, to determine which among the HEIs have already formulated their AI regulation guidelines and policies. These documents, published between January 2023 and May 2024, came in various formats: guidelines, policies, recommendations, toolkits, and official memoranda.

In analyzing the documents, the researcher employed a combination of deductive-inductive thematic analysis. The deductive component of the thematic analysis was the initial stage whereby the researcher assigned predetermined themes in analyzing the documents reviewed. These predetermined themes were gathered from the framework of Wu et al. (2024) which enumerated components of what constitutes AI governance in universities. These themes included: (1) guidelines for responsible AI use, (2) accountability mechanisms, and (3) risk management processes. In clustering the data

based on regulatory framework, the researcher also made use of Remolona's (2023) characterization of "soft" and "hard" regulation.

Nevertheless, while predetermined themes were utilized for a more structured data analysis, the researcher has in the process found that there are nuances to how Philippine universities perform AI governance which general clustering of regulatory mechanisms may not be able to capture. The inductive process of thematic analysis sets in whereby the researcher more accurately described the characteristics of each university's AI governance model.

While the combined deductive and inductive thematic analysis of documents is in itself a rigorous undertaking, the researcher acknowledges that there are certain limitations. For one, the study is limited to publicly available documents—those that were uploaded in university websites and/or communicated in news reports online. This means that universities who have drafted AI policies or have issued internal guidelines are not covered in this comparative analysis. It should also be made clear that it is not the objective of this paper to discuss the merits or efficiency of AI governance models in this university, especially as there are little to no empirical studies yet that measure the efficiency of their implementation. Rather, it is this paper's objective to characterize and comparatively analyze the AI governance models of these universities with the goal of sparking discourse in the formulation of a national ethics guidelines on AI use.

RESULTS AND DISCUSSION

As of this writing, there are at least eight higher education institutions in the Philippines that have publicized their regulatory approaches to the use of AI for academic purposes in the form of guidelines, recommendations, toolkits, and policies. These include: the University of the Philippines (UP) system, University of the Philippines Open University (UPOU), University of the Philippines Los Baños (UPLB) Graduate School, Ateneo de Manila University (ADMU), De La Salle University (DLSU), De La Salle University-Benilde, Mindanao State University (MSU), and Far Eastern University (FEU). With the Philippines' regulatory measures on AI use still in its early stage of development (Hernandez et. al, 2024), the emerging consensus and divergent views from these universities with respect to regulatory approaches offers a productive starting point in stimulating discussions to scale up AI use regulation on a national level.

What is noticeable among the AI governance models from these universities is that they converge on universal principles on AI Use but their approaches differ based on their educational philosophies, risk appetites, and operational constraints. In this study, three clustered themes have emerged—soft, hybrid, and hard regulation models. This study uses the term "soft" and "hard" regulations which were also used by local scholar Remolona (2023) in clustering regulatory frameworks in emerging technologies. By "soft regulations," it is referred in this study as non-binding, principle-based guidelines that emphasize ethical norms, education, and institutional autonomy over enforcement. By "hybrid," it is meant as middle-ground approach combining soft governance principles with enforceable policy elements, creating structured but adaptable frameworks. And by

“hard regulations,” it is referred herein as binding, rule-driven policies with explicit penalties, legalistic language, and centralized enforcement.

As shown in the table below, the researcher, by and large, finds that majority of the universities under investigation employ “soft regulation” albeit with nuanced descriptions—UP, UPOU, UPLB Graduate School, ADMU, FEU, and DLSU. DLSU-Benilde employs a hybrid approach characterized by its flexible regulations but policy-driven mechanisms. Meanwhile, MSU uses a “hard approach” model of legalistic tone and punitive measures.

Table 1
Regulatory Approaches to AI among 8 Philippine universities

Univer sity	Regulat ory Approa ch	Descriptio n	Title of Document and Upload Location	Guideli nes	Accounta bility Mechanis ms	Risk Manage ment Process es
UP System	Soft	Principle- based approach	<i>University of the Philippines Principles for Responsible and Trustworthy Artificial Intelligence</i> (UP official website)	Broad ethical principles	Voluntary adherence	Literacy-focused adaptation
UPOU	Soft	Context-specific approach	<i>Guidelines on the Use of AI in Teaching and Learning</i> (UPOU official website)	Direct usage instructions	Academic culture enforcement	Distance-learning flexibility
UPLB Grad School	Soft	Recommen datory but strict in tone	<i>Recommended Use of AI Tools in Graduate Studies</i> (UPLB Graduate School Official Facebook page)	Emphatic prohibitions	Strict tone but no penalties	Graduate integrity focus

ADMU	Soft	Faith-based approach	<i>Guidelines on the Responsible Use of Generative AI (GenAI) in Higher Education</i> (ADMU official website)	Ethical use tied to Catholic values	Existing misconduct procedures	Faculty discretion
FEU	Soft	Competency-centric approach	<i>Student Guidelines on the Use of General Artificial Intelligence</i> (FEU official website)	Competency-based restrictions	Pedagogical penalties	Case-by-case assessments
DLSU	Soft	Educative & Advisory approach	<i>Student Guide to Artificial Intelligence (AI) and Large Language Models (LLMs)</i> (DLSU official website)	Ethical usage education	Professor-determined	Preemptive advice
DLSU-Benilde	Hybrid Approach	Flexible but Policy-driven	<i>AI Tool Usage Policy</i> (DLSU-Benilde helpdesk portal)	Clear usage boundaries	Formal reporting system	Transparency requirements
MSU	Hard Regulation	Policy-driven	<i>Mindanao State University Policy on the Fair and Ethical Use of AI and Its Applications</i> (MSU official website)	Legalistic mandates	Disciplinary actions	Technical enforcement

Principle-based ‘Soft regulation’

UP, for instance, said to be the first in the country to publicize an interim guideline on AI use in education (Subingsubing, 2023), could be viewed as performing the “soft regulation” approach with principled rather than prescriptive regulation. Its interim guideline dubbed the “University of the Philippines Principles for Responsible and Trustworthy Artificial Intelligence” (2023) is but a set of broad ethical principles with respect to AI use—while deliberately avoiding prescriptive “dos and don’ts” (Remolona, 2023). The interim policy provides directional guidance while permitting individual faculty members, departments, colleges, and constituent universities to determine their own implementation pathways.

As published in UP’s official website, 15 principles on AI use were laid down by the university, to wit: (1) common good, (2) empowerment, (3) cultural sensitivity, (4) privacy, (5) accountability, (6) meaningful human control, (7) transparency, (8) fairness, (9) safety, (10) environment-friendly, (11) primacy of learning goals, (12) human capital development, (13) capacity building, (14) education management and delivery, and (15) collaboration. Looking closely, the soft regulation approach manifests in several key aspects of UP’s guidelines: (1) emphasis on literacy and capacity-building rather than prohibition; (2) focus on ethical principles (e.g., learner-centeredness) rather than technical specifications; (3) open-ended language that invites interpretation and adaptation; (4) absence of punitive measures or detection protocols; and (5) UP’s plan to draft an AI Code of Conduct also shows its principle-based ethos.

This choice for a flexible framework, according to Remolona (2023), is due to the fact that UP is critical that a rule-based approach may restrict innovations through AI. This perspective may be traced to UP’s historical emphasis on institutional autonomy and critical thinking, which, as a consequence in this context, treats AI integration as an opportunity for pedagogical innovation rather than merely a risk to be mitigated. The flexibility by which UP laid down broad ethical principles also serves the purpose valuing academic freedom and disciplinary flexibility across UP’s diverse constituent units and colleges.

Nevertheless, this approach raises questions about enforceability and consistency (Birkstedt et al., 2021). Without clear mechanisms for monitoring compliance or addressing violations, the guidelines rely heavily on voluntary adherence and shared values within the UP community. As Bantang (2023) noted in a report by Subingsubing (2023), the university is still in a “learning process” regarding AI, suggesting these soft regulations represent an initial, exploratory phase that may evolve toward more concrete policies as experience accumulates.

Context-specific regulation

Constituent universities of the UP system have declared to adapt the UP’s Principles for Responsible and Trustworthy Artificial Intelligence. Among the firsts to publicize their own operational guidelines are the UPOU and UPLB Graduate School. As

raised in the previous section, laying a broad set of principles and open-ended statements allows for flexibility and diverse operational interpretations.

In UPOU (2023), for instance, guidelines for students were straightforwardly stated as: (1) Declare and properly cite AI-generated content for their course requirements; (2) Avoid plagiarism when utilizing AI for their course work; (3) Disclose the use of AI in data collection activities to respondents or participants as part of their course requirements; (4) Not use AI for harm or illegal purposes. Note that in the guideline published, it remained true as a guideline in that there was no penalty clause declared therein. This guideline by UPOU operationalizes principles outlined in UP's Principles for Responsible and Trustworthy Artificial Intelligence such as academic integrity, responsible AI usage, and transparency while at the same time fostering an academic culture that encourages responsible AI use rather than outright banning it.

The flexibility by which UPOU engages in AI regulation could be attributed to its open and distance learning (ODL) environment where distance learners rely more on digital tools, hence rendering strict bans as impractical. While it could be argued that this poses ambiguity risks without clear penalties, this approach gives a sense of agency to its digital learners in that they are treated as responsible actors, not rule-breakers to monitor. This effectively communicates the premise that the application of regulatory norms should be based on specific institutional contexts and that regulatory frameworks need to be tailor-fitted in non-traditional campuses like UPOU. UPOU's case is an empirical illustration of what Birkstedt et al. (2021) emphasized that AI governance measures must devote attention to context and consider local educational cultures as important considerations in the enactment of guidelines and policies in AI use.

Recommendatory but strict in tone


For UPLB Graduate School (2024), instead of releasing a guideline, they posted "Recommended Use of AI Tools in Graduate Studies." This conforms to the 'soft approach' of UP. Rather than setting rules, UPLB puts forth a set of recommendations based on the ethical principles of integrity, accountability, and transparency. The figure below shows the photo they posted in their official Facebook post:

Figure 1
UPLB Graduate School's Facebook Post on Recommended Use of AI Tools in Graduate Studies

RECOMMENDED USE OF AI TOOLS IN GRADUATE STUDIES

The UPLB Graduate School provides the following recommendations for faculty members and students regarding the use of AI tools, based on the ethical principles of **Integrity, Accountability** and **Transparency**:

- **Original Content Creation:** AI tools must NOT be used to create the content (e.g., results and discussion) of academic papers. Theses and dissertations should be originally drafted by the student.
- **Language and Readability Enhancement:** AI tools may be utilized ONLY for improving the readability and language of academic papers (e.g., grammar and style checking).
- **Declaration of AI Use:** Any use of AI tools must be declared. Outputs generated by AI tools should be reviewed by the authors, who are accountable for their academic works. A sample declaration is as follows:
"While preparing this work, the author(s) employed [NAME OF AI TOOL] for [REASON]. Following its use, the author(s) thoroughly reviewed and edited the content as necessary and assume(s) full responsibility for the final content of the publication."
- **Quality and Ethical Review:** The guidance/advisory committee is responsible for reviewing the manuscripts of graduate students to ensure quality, rigor, and adherence to ethical practices.



Notice, however, that while it is recommendatory, the language is stricter as compared to the operational guideline of UPOU. While technically framed as “recommendations” and therefore non-binding, the language employed is much stricter and more prohibitive. For instance, UPLB Graduate School deliberately capitalized “NOT” (“AI tools must NOT be used to create the content”) and “ONLY” (“AI tools may be utilized ONLY for improving the readability and language of academic papers”). The use of “NOT” signals a strong prohibition against content creation, while the use of “ONLY” signifies exclusivity on its use solely for grammar and style checking. Their exclusive permission for AI in “readability and language” (grammar, style checks) on one hand acknowledges that many graduate students may benefit from AI-assisted polishing, but not substantive drafting. At any rate, the emphatic wording (“NOT,” “ONLY”) leaves little room for interpretation and are unusually rigid tone for what is ostensibly a suggestive document.

But while strict, UPLB Graduate School does not use punitive language like “violations will be penalized” which thus make their approach within the soft approach, flexible, principle-driven, respect-for-academic-freedom umbrella of UP. The nuance in UPLB Graduate School’s AI regulation could potentially mean that while it respects UP’s institutional preference for soft regulation, it unofficially leans toward stricter enforcement due to its graduate-level focus, where original research and scholarly

integrity are of primordial importance. In fact, UPLB Graduate School's operational guideline may be categorized as "flexible guidance" as per Wu et al. (2024) in that it uses democratic means like the use of social media (in this case, through their official Facebook account) to create an online space for discussions on AI among the university community. The UPLB Graduate School case may be an instructive demonstration that even within a soft-regulation framework, tone, phrasing, and leveraging social media can effectively convey and enforce norms without resorting to punitive measures.

Faith-based approach

Unlike UP and other HEIs, the guideline of Ateneo de Manila University (2024) with respect to AI use was toned differently consistent with it being a Catholic university. In the introductory part of Ateneo's "Guidelines on the Responsible Use of Generative Artificial Intelligence (GenAI) in Higher Education," it expressed its Ignatian Pedagogy and Mission in light of AI use, to wit:

In the context of the stated mission of the Ateneo de Manila to form Christ-centered persons of conscience, competence, compassion, and commitment, and recognizing that our graduates will encounter a world where GenAI increasingly becomes an everyday tool, the Higher Education cluster acknowledges the need to assist students deepen their AI literacy, taking advantage of its opportunities while recognizing its risks (competence) and equipping them to use GenAI ethically and responsibly (conscience) in the service of others for the greater good (compassionate commitment).

Even in provisions pertaining to ethical use, ADMU (2024) framed AI use through the lens of "human dignity," "the common good," and "zero tolerance for harm"—language deeply rooted in Catholic moral theology. While the content of their regulation appears to be similar with that of other institutions including verification of information generated by AI and transparency over the use of AI in any work, Ateneo's faith-based language distinguishes their framework from secular institutions in that it infuses AI governance with a moral dimension, to wit:

Instructors and Students should: (1) Ensure that, in using GenAI technologies, the promotion of human dignity and the common good are upheld. (2) Ensure that the use of GenAI technologies does not result in harm to others. (3) Adopt a zero-tolerance position toward the use of GenAI for misinformation. (4) Verify the information and sources generated by GenAI technologies for accuracy and hidden bias. (5) Declare the use of GenAI in any work, through a statement such as "This work [specify: paper, artwork, or other output] used GenAI for the following components: [Choose from the following] brainstorming, outlining,

sentence generation, study design, editing, or [describe other uses not found in this list]. The following GenAI technologies were used [provide a list of GenAI technologies used].” Alternatively, if GenAI was not used, one can declare, “This did not use GenAI in any aspect of the work.”

This approach of ADMU may also be categorized within the soft regulation approach especially as they issued a “guideline” rather than a “policy.” More so, they have given leeway for faculty members to come up with their own course policy on GenAI and mandated them to include such policy in their course syllabus. Specifications in the course syllabus must include the (1) extent of permissible AI use, (2) clear instructions on use of GenAI for assignments and assessments, (3) clear rubrics for assessing originality, and (4) proper source attribution.

Despite these, ADMU’s guideline is not without accountability structures. The document says that “for students, violations of the guidelines set out in this document will be dealt with according to existing procedures on the handling of misconduct that are found in the different units of the Higher Education cluster.” ADMU, however, cautioned that exacting accountability should not fully depend on GenAI detection technologies (e.g., Turnitin) and that there is grievance procedure to undertake.

Competency-centric framework

Far Eastern University (FEU, 2024) has also uploaded in its official website the “Student Guidelines on the Use of General Artificial Intelligence” which may be categorized within the soft regulation umbrella framed within a competency-centric framework. In the introductory statement of said guidelines, FEU premised the adaption to Gen AI in their academic programs by emphasizing core values and “student-centered learning.” Its introductory paragraph as well said that justifications as to why AI-generated student outputs are not acceptable stand on FEU’s Learning Outcomes (FEULOs).

Indeed, what distinguishes FEU's approach is its curricular alignment to FEULOs. While other universities like UP lay down broad ethical principles or Ateneo communicates in a faith-based fashion, FEU's guidelines are mapped directly to institutional learning outcomes. Implicitly, the guideline does not just ask "is this cheating?" but "does this AI use compromise skill development?" For instance, the guideline explicitly bans AI-generated content in assignments measuring critical thinking (e.g., argumentative essays), original creativity (art portfolios), metacognition (reflection papers), and factual recall (exams), as these represent what FEU terms "non-delegable competencies" essential for student development. The reasoning behind these prohibitions is not solely based on academic integrity but based on how AI influences competency development. Conversely, FEU’s (2024) guideline encourages students to utilize AI as tools to develop competencies such as “communication, intellectual curiosity, critical thinking, creative problem solving, professionalism, and digital citizenship.”

In terms of enforcement mechanisms, FEU also made mention that violations in the said guide may result to consequences under FEU’s Academic Integrity Policy.

Interestingly, penalties herein are also framed using pedagogical lens rather than purely punitive measures. For instance, the consequence of submitting AI-generated work for a prohibited competency assessment would first require a resubmission of assignment resubmission with human-authored content before any formal disciplinary measures. More so, the policy requires faculty to first determine whether AI use violated competency demonstration requirements before they could apply for sanctions. This is instructive of a kind of accountability mechanism that gives more focus on learning restoration than punishment.

This model by FEU resonates with Chan's (2023) concept of the pedagogical dimension of AI governance in universities. Pedagogical dimension, according to Chan (2023), is the framework whereby the focus is on adapting teaching methods and assessment strategies in response to AI's growing capabilities. In this model, the main consideration is pedagogy—how students' learning outcomes are developed such as their critical thinking, creativity, among other skills, rather than undermining their academic integrity.

Educative & Advisory Guidance

The De La Salle University (2023) also released "Student Guide to Artificial Intelligence (AI) and Large Language Models (LLMs)" published in its official website and revised in July 18, 2023. This can also be classified as "soft regulation" in that the said document does not lay down particular punitive measures but was merely intended to educate students on how AI works, its ethical considerations, and how to use it responsibly. This model of AI governance resembles what Wu et al. (2024) dubbed as "educative and advisory guidance" in which guidelines do not enforce or prohibit any actions for the university community, but instead they focus on providing resources for people to learn more about AI and recommend possible behaviors to avoid risks and promote benefits.

It also has a Frequently Asked Questions (FAQ) at the end of the document, which communicates the impression of this guide as an educational piece rather than a hardline document of prohibitions and corresponding penalties. The FAQ communication style of De La Salle (2023) adheres to Wu et al.'s (2024) Socratic method of AI governance which challenges other forms of AI governance that are usually static. In here, the university imposes questions on readers and the guidelines provide possible answers or rationale to communicate the policy in a clearer, educational manner.

Figure 2
De La Salle University's FAQ Guide Posted in their Official Website



Frequently Asked Questions

- *What is AI?:* Artificial intelligence (AI), is a branch of computer science that aims to build machines capable of mimicking human intelligence.
- *What are Large Language Models (LLMs)?:* LLMs are a type of AI that have been trained on vast amounts of text data. They generate human-like text based on the context provided to them.
- *How does AI affect me as a student?:* AI can assist with tasks like writing, research, and studying. However, it's important to use AI responsibly and understand the potential issues around data privacy and academic integrity.
- *Can I use AI to write my essays?:* AI can assist with outlining, drafting, and editing essays, but the final work must always be your own. Always check the accuracy of AI-generated content and never use AI to plagiarize or cheat.
- *Is AI always accurate?:* No, AI can sometimes produce outputs that seem plausible but may not be accurate or factual. Sometimes, much of the output is accurate and a small detail is inaccurate. Always verify the accuracy of any AI-generated content that you use.

The student guide produced by De La Salle University (2023) is also instructive on operational issues. For one, while the document does not explicitly state that students should cite the extent of their AI use unlike other universities' guidelines, it nevertheless instructs students to "follow professor's guidelines" and "maintain notes and revision histories of your work whether you use AI or not." It also instructs to "retain copies of your prompts (i.e., what you entered into AI) and clear notes about how you made use of AI." This instruction is a preemptive guide for students to prevent being accused of academic integrity violation such as plagiarism, fabrication of data, or cheating in any way.

Another instance of clearer instruction in this guide is with respect to data privacy and security wherein students were instructed to not input personally identifiable or sensitive information into AI systems including real names, email addresses, or personal financial information but rather use anonymous data. As an educational guide, the document explained that it is not yet clear where the data inputted in the AI system ends up.

While this student guide standardizes understanding on AI use, it is also interesting to note that it renders respect to faculty autonomy and gives discretion to professors in coming up with specific AI policies in their classes. The introductory part of the Ethical Considerations section of the guide expresses in underlined words that it is the responsibility of the students to understand their professor's policy on AI use. This model of AI governance conforms to that of Wang et al. (2021) which grants professors the authority to set policies and assess violations therein while still maintaining institutional oversight.

Policy rather than guideline

Despite DLSU's relatively soft approach and instructive tone in communicating its guide to using AI, DLSU-Benilde (2024) released an "AI Tool Usage Policy" which is not only a guideline but a "policy" with clear accountability measures.

Figure 3

DLSU-Benilde's AI Tool Usage Policy Uploaded in Their Official Website

AI Tool Usage Policy

1 year ago · Updated

Read the [AI Tool Usage Policy](#) to know Benilde policies in using AI tools for academic and professional use.

Here are guidelines to keep in mind when using these tools:

1. **Understand the capabilities and limitations of AI tools.** Familiarize yourself with the capabilities and limitations of AI-generated content. Use these tools in a manner that upholds academic standards.
2. **Use AI tools responsibly.** Use AI tools to enhance your learning and understanding of the subject matter, rather than a substitute for original thought and creativity.
3. **Cite sources.** When using AI-generated content, cite your sources to give credit where credit is due.
4. **Be transparent.** Be transparent when you use AI tools; let your teachers know when you have used them in your work.
5. **Uphold academic standards.** Ensure that your work meets the academic standards and expectations of your school, program, and individual courses or assignments.

Using AI tools for school requirements should be in line with [academic honesty policies](#). Cheating through the use of AI tools can be reported by answering the [Filing of Cheating Incident form](#). Report this within **5 school days** of knowing/witnessing the incident. As stated in the [Undergraduate Student Handbook](#), teachers should secure a written admission from the student concerned. SDEAS students may submit this through recorded video and transcription. If the student didn't admit to cheating, submit evidence and written testimonies from witnesses.

To be fair, DLSU-Benilde's AI Tool Usage Policy does not have a hard ban on AI. The policy permits usage but sets clear boundaries based on academic honesty policies (e.g., no cheating, proper citation) rather than treating AI as inherently unacceptable. However, the policy seemingly puts premium on transparency and accountability measures as it mandates disclosure of AI use to instructors and requires evidence in cheating cases such as written admission, video testimony, and witness statements. The policy also explicitly referenced enforcement mechanisms and disciplinary procedures such as filing cheating reports within 5 days and ties AI misuse to existing academic integrity policies (Undergraduate Student Handbook). This shows that the policy treats AI like other academic misconduct (plagiarism, cheating) rather than a unique threat. Hence it is clear that while DLSU-Benilde's AI Tool Usage Policy encourages learning about AI's role in education, violations of which trigger formal reporting, making this more than just advisory but policy enforcement.

Hard regulatory approach

Among all universities cited in this study, Mindanao State University (MSU) puts forward "hard regulation" in a rather legalistic tone in regulating the use of AI for academic purposes. On its official website, MSU (2024) issued "Mindanao State University Policy on the Fair and Ethical Use of Artificial Intelligence and its Applications."

From the title alone, MSU's approach deviated by crafting a policy approved by the Board of Regents for system-wide implementation rather than just a guideline unlike most universities cited in this study. Its language is also legalistic, deviating from the tone of other universities. Reading through its explanatory note, for instance, MSU premised the need for this institutional policy to compensate for direct laws or statutes regarding AI use in the country. It also referenced existing Philippine laws as legal bases for enforcement such as Data Privacy Act and Intellectual Property Rights. Even the way the policy was drafted is legalistic wherein it includes repealing clauses (Article XV, Section 3) and even separability clause (Section 2). This type of regulation affirms the model of Molina-Carmona & Garcia-Penalvo (2025) which laid emphasis on legality as one of the fundamental principles of AI governance in universities.

The manner by which other universities would see as prescriptive requirements was presented in this policy as mandatory. For instance, "authors **MUST** include a 'Declaration of Generative AI Use' in thesis/dissertations (Article VI, Section 3). It also bans AI as "co-author" (Article VI, Section 2) and forbids faculty from using AI to grade assignments (Article VII, Section 4). These are not merely directional, but rather mandatory policies. More so, it follows a hard approach in that it enforces mandatory compliance mechanisms such as "disciplinary actions" under Article XIII (Enforceability); creates bureaucratic enforcement structure by assigning enforcement to the Research Integrity and Compliance Office (RICO) and academic units (Article XII); and provides technical measures in enforcing plagiarism such as requiring submission through the MSU Online Learning Environment (MOLE) with AI-audited plagiarism checks (Article VI, Section 5).

Conclusions

RQ1: What Philippine universities have publicized their own guidelines and policies in AI use regulation?

The researcher found eight (8) publicly available guidelines or policies from leading HEIs in the country, including: the UP System, UPOU, UPLB Graduate School, ADMU, DLSU, DLSU-Benilde, FEU, and MSU.

RQ2: What AI regulatory approaches have they undertaken?

The study clustered three distinct regulatory approaches adopted by Philippine universities in governing AI use. The majority of institutions implemented soft regulation, characterized by principle-based guidelines that emphasize flexibility and education rather than strict enforcement - this approach was exemplified by UP, UPOU, ADMU, DLSU, and FEU. A hybrid approach emerged at DLSU-Benilde, which combined policy-driven requirements with maintained flexibility, creating a middle ground between advisory guidelines and binding rules. In contrast, MSU stood out for its hard regulation model, implementing legally framed policies with rigorous enforcement mechanisms and clear penalties for violations.

RQ3: How are these regulatory approaches described in terms of form, guidelines, accountability mechanisms, and risk management processes?

In terms of form, the universities laid down their guidelines differently: UP released an interim guideline that laid down directional principles; UPOU released an operational guideline; UPLB Graduate School issued a set of recommendations; ADMU and FEU released guidelines; DLSU released student guide with educative FAQs in a question-and-answer format; and MSU issued a comprehensive board-approved policies with legally binding language.

In terms of guidelines, the UP System established broad ethical principles that encouraged contextual interpretation across disciplines, whereas FEU developed competency-specific restrictions that directly linked AI use to learning outcomes. ADMU uniquely integrated its Catholic mission into ethical guidelines, while DLSU-Benilde created detailed usage protocols.

In terms of accountability mechanisms, there were no explicit accountability measures especially in the UP System. It can be inferred, however, that they rely on a trust-based approach, relying primarily on voluntary adherence to ethical principles and professional ethics among faculty and students. The same goes with UPOU and UPLB Graduate School. This reflects a philosophical commitment to institutional autonomy and academic freedom. In contrast, Ateneo de Manila University (ADMU) and Far Eastern University (FEU) employ modified soft-regulation approaches: ADMU through its existing misconduct procedures grounded in Ignatian values, and FEU through pedagogical penalties tied to competency development. DLSU-Benilde, meanwhile, implements formal reporting systems and ties AI misuse to academic dishonesty in their Student Code. At the strictest end, Mindanao State University (MSU) has established

comprehensive hard-regulation measures, including a dedicated Research Integrity and Compliance Office (RICO) and clear disciplinary procedures approved by its Board of Regents.

In terms of managing risks, the UP System implies literacy-building and capacity development, viewing education as the primary safeguard against misuse. UPLB Graduate School focuses on graduate-level integrity through emphatic (though non-binding) recommendations distributed via social media. This aligns with its broader emphasis on pedagogical adaptation rather than punitive measures. FEU has developed a more structured yet still flexible system of case-by-case assessments, where faculty evaluate whether AI use compromises demonstration of core competencies. The same goes with ADMU and DLSU. The most stringent measures appear at MSU, which employs technical enforcement including required submission through an AI-audited plagiarism detection system (MOLE). DLSU-Benilde occupies an intermediate position with its transparency requirements and documentation standards.

RQ4: How do these regulatory approaches contribute in AI Governance literature?

Nuances by which universities in the Philippines implement their AI governance models extends existing conceptualizations and offer breakthrough models in the literature. For instance, the UP System's principle-based guidelines affirm Wu et al.'s (2024) emphasis on flexible governance, and extend it by deliberately avoiding prescriptive rules to preserve academic freedom. The ADMU model of faith-based integration to AI use is a novel case. The UPOU model is also an interesting case study to demonstrate how AI policies are made context-specific (Birkstedt et al., 2021) in open and distant university settings. In terms of communication strategies, UPLB Graduate School's use of social media to disseminate AI recommendations is instructive of Wu et al.'s (2024) community engagement paradigm in democratizing AI use decision-making. DLSU's FAQ-style student guide is meanwhile reminiscent of the Socratic method (Wu et al., 2024) and builds the case of how non-coercive, dialogic communication can foster ethical AI literacy. FEU's competency-based approach demonstrates Chan's (2023) pedagogical dimension to AI governance. DLSU-Benilde's hybrid model—a toolkit policy—blends soft guidance with enforceable accountability. Faculty autonomy, as seen in ADMU and DLSU's delegation of AI policy implementation to professors, resonates with Wang et al.'s (2021) model of "professors' academic governance."

RQ5: What insights can be drawn from these approaches in developing national guidelines in AI use regulation in education?

Several insights may be drawn from this comparative analysis of university AI regulation logics. First, if national guidelines be formulated, it must balance standardization with flexibility to accommodate institutional diversity. As shown in the study, there are competing priorities across institutions in that UP values democratic models of implementation, ADMU leans towards their faith-based direction of AI regulation, or FEU puts premium on pedagogical value. Second, while ethical principles show consensus, enforcement mechanisms require careful calibration to avoid being either too lenient or overly restrictive. These findings suggest that national guidelines

would benefit from: (1) adopting core ethical principles as a baseline, (2) allowing contextualized implementation, and (3) incorporating graduated accountability measures that recognize different institutional risk profiles and pedagogical needs. Much of these recommendations will be discussed in the Recommendations section.

Recommendations

Based on the comprehensive analysis of AI governance approaches across eight leading Philippine universities, the following recommendations are proposed for the development of national guidelines by the Commission on Higher Education (CHED):

1. **Start by building foundational principles.** CHED may build on UP system's Principles for Responsible and Trustworthy Artificial Intelligence as a starting point to establish minimum standards while allowing institutional flexibility in implementation.
2. **The national guidelines should recognize institutional diversity.** The national framework may provide specialized guidelines for unique learning environments as in the case of UPOU, respect faith-based approaches as in the case of ADMU's Ignatian philosophy, and support competency-focused models like FEU's learning outcomes approach.
3. **There has to be a balance between innovation and accountability.** Drawing from the differentiated approaches observed in this study, soft regulation for pedagogical innovation (UP, DLSU models) should be encouraged while incorporating enforceable standards for academic integrity (MSU, DLSU-Benilde models), and develop hybrid options that combine principles with accountability.
4. **Promote Participatory Governance.** CHED may further generate participation in regulating AI use by adopting DLSU's dialogic FAQ approach for clearer communication, utilizing UPLB's social media strategy for communication engagement, and maintaining faculty autonomy in implementation (ADMU, DLSU models)
5. **Establish Monitoring and Evaluation System.** Given the early stage of AI governance, CHED may implement phased policy development with regular review cycles; create channels for sharing best practices across institutions; and fund research on policy effectiveness across different approaches.
6. **Address Implementation Challenges.** This may be done through capacity-building for AI literacy following UP's model, technical infrastructure for enforcement (learning from MSU), and giving detailed grievance mechanisms and due process similar to ADMU's approach.
7. **Future Research Priorities.** Apparently, the efficiency of AI governance models—whether soft, hard, or both—can be better understood through empirical studies that assess the effectiveness of these approaches. CHED may commission studies related to this and may even come up with longitudinal analysis on how their AI guidelines and policies evolve over the years.

Compliance with Ethical Standards

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