



BFH AI policy

Adopted by the FHL on 7 May 2025.

Preamble	<p>Bern University of Applied Sciences (BFH) recognises the transformative potential of artificial intelligence (AI) and the associated ethical challenges in research, teaching (education and continuing education) and university operations. AI-supported technologies can enable innovative research approaches and make learning content more dynamic, personalised and practice-oriented while also increasing efficiency in university operations, such as through optimised processes, intelligent management systems and applications.</p> <p>The AI policy is based on the applicable BFH guidelines¹.</p>
Objectives and scope	<p>The AI policy applies to all areas of BFH and establishes the framework for responsible and ethical use of AI technologies. It is applicable to research projects, undergraduate degree programmes, continuing education, e-learning platforms and subject-specific laboratory and project work, as well as in university operations.</p> <p>The policy aims to support employees and students in the use of AI in teaching, research and university operations by establishing a foundation for the use of AI for:</p> <ul style="list-style-type: none">• A culture of innovation that fosters creativity, openness, critical thinking and inter-school collaboration• Ensuring transparency and traceability in the use and development of AI systems• Ensuring compliance with data protection, information security and legal requirements• Maintaining academic integrity and ensuring ethically mindful conduct• Creating the conditions in teaching, research and university operations that promote the acquisition of fundamental, forward-looking and advanced digital skills in order to optimally prepare students and employees for digital transformation in an increasingly data-driven world.• Raising students' and employees' awareness of ethical, social, environmental and technological challenges in the use of AI systems.• Designing forward-looking learning and working environments.
Principles	<p>BFH ensures that research, teaching and university operations at BFH comply with the applicable national regulations for responsible use of AI. In addition to the applicable legal bases, this includes internal guidelines for the secure handling of information and respectful conduct, as well as the provisions on scientific practices and integrity.</p> <ul style="list-style-type: none">• Transparency and traceability: BFH Members use AI systems mindfully and, to the extent possible, provide transparent information about how such systems work, as well as their limitations, algorithms and data sources.

¹ This applies in particular to the *Directive regarding Use of IT Resources at Bern University of Applied Sciences*, 1 January 2021.
Available at [Weisung_IT-Ressourcen_BFH.pdf](#).

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- **Information security and data protection:** All processed information is handled in accordance with the BFH Policy on Information Security and Data Protection². New AI systems and AI tools are subject to a review with regard to the defined standards before being put into use. This does not apply to the use of AI tools for testing with dummy data.
 - **Ethical reflection and accountability:** In research and teaching, ethical reflection and accountability are central to critically examining the implications of AI use³. Based on these ethical dimensions, those who use AI have a responsibility to be mindful of the results of their work and the impact of their use of AI.
 - **Academic integrity:** AI is used responsibly and in accordance with academic integrity⁴.
 - **Educational appropriateness and equal opportunities:** In teaching, AI tools are used in a targeted manner when they add value to the instruction, such as through adaptive learning materials or automated feedback. In the evaluation of the AI tools that are actively used in teaching, students are involved to an appropriate extent. All students have the same access to these AI tools. BFH ensures equal access to AI applications for all employees.
 - **Sustainable use of AI:** BFH encourages the responsible and sustainable use of AI in research, teaching and university operations.

Responsibilities and roles

BFH defines AI tools that can be used as standard within BFH⁵. When processing information with higher protection requirements, it is necessary to check whether the tool has been approved for that purpose. The aforementioned principles (in particular ISDP and ethical aspects) also apply to these tools.

- **All BFH members** use AI tools mindfully. They are aware that such tools can lead to inaccuracies, distortions and harmful content, and that they cannot replace human expertise and independent judgement. They comply with applicable regulations and refrain from disseminating false, harmful or misleading information without appropriate labelling.
- **Teaching staff** are responsible for ensuring compliance with the principles described above in the selection and use of AI tools in teaching as part of the teaching concept. They assess the suitability of these tools in terms of learning objectives, skills development and practical relevance. They provide students with transparent information about the AI tools used. When AI is used in the assessment of test performance, this must be transparently disclosed in advance.

Teaching staff regularly evaluate the effectiveness of these tools and determine how AI-generated content should be cited in written work and

² BFH Policy on Information Security and Data Protection, 2 May 2023. Available at: [BFH_Richtlinie.pdf](#).

³ See *Ethical guidelines on the use of artificial intelligence (AI) and data in teaching and learning for educators*, European Commission Directorate-General for Education, Youth, Sport and Culture (2022). Available at: [Ethische_Leitlinien_für_Lehrkräfte.pdf](#) – in which the considerations “human agency, fairness, humanity, and justified choice” are set forth as the basis for a reflective ethical assessment of the use of AI.

⁴ *Regulations on scientific integrity at Bern University of Applied Sciences (WissIR)*, 16 November 2022. Available at: [BFH_WissIR_Reglement.pdf](#).

⁵ Further information and recommendations on how to use AI-based tools are provided by BFH’s *Education 6.0* project on an online platform. Available at: [Home page – Education 6.0](#).

presentations based on established disciplinary citation guidelines and standards at BFH. Specifications are issued at the school and/or degree programme level. More specific specifications are possible at the module level. Clear communication of the requirements ensures that AI-generated content is not mistakenly presented as independent work.

- **Students** use AI tools in a reflective and justifiable manner in their studies, exclusively within the framework set by BFH, and actively provide feedback to teaching staff and researchers to optimise the use of AI tools. They gain an understanding of the potential and limitations of these tools, thereby strengthening their digital capabilities with regard to the requirements of specific fields and reflecting on the ethical and academic implications of AI use.
 - **Researchers** are familiar with the fundamental properties applications of the deployed AI systems and algorithms in order to ensure transparency⁶. Through deliberate reflection and adaptation, they improve the use of AI and are mindful of the impact on research. They also take into account the legal requirements – as formulated in the EU AI Act – and commit to complying with future legal requirements. In scientific work, they clearly mark AI-generated content to ensure traceability and integrity⁷.
 - **BFH service units** (such as HR, Finance/Controlling, BFH Library, Communications, Vice-President’s Office, school student and continuing education administration and infrastructure) use AI tools to improve the efficiency and/or the quality of processes in accordance with applicable requirements and ethical standards⁸. They gain an understanding of the AI-based functionalities within the deployed applications and configure them according to the principles formulated in this policy. They comply with legal requirements in the development and offering of their own AI systems and commit to complying with future legal requirements.
 - **Support and service offices** such as the CISO (Chief Information Security Officer), the Data Protection Office, and the Virtual Academy Office are responsible for providing subject-area and technical advice. They ensure the functionality of BFH-approved AI tools and decide on, as well as
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⁶ See *Living guidelines on the responsible use of generative AI in research*, European Commission (2025). Available at: [Living_Guidelines_AI](#); recommendation for researchers, research organisations and federal institutions on integrity, transparency, accountability and sustainability in the use of AI; continuously updated as a “living document” through community feedback.

⁷ See Art. 8 *Regulations on scientific integrity at Bern University of Applied Sciences (WissIR)*, 16 November 2022. Available at: [BFH_WissIR_Reglement.pdf](#):

1. *Researchers adhere to applicable legal provisions, as well as other requirements and directives from BFH and any relevant funding organisations.*

2. *In particular, researchers comply with the Human Research Act as well as the statutory provisions on data protection.*

This standard underpins the approach presented in the above section to ensure transparency and integrity in research through the responsible use of AI.

⁸ See Chapter 2 “Overarching values and strategic positions” in: *Digitalisation at BFH – Positions: Basis for Strategy 2023–2026*, 21 December 2021. Available at: [Digitalisierung an der BFH.pdf](#); furthermore: *Ethical guidelines on the use of artificial intelligence (AI) and data in teaching and learning for educators*, European Commission Directorate-General for Education, Youth, Sport and Culture (2022). Available at: [Ethische_Leitlinien_für_Lehrkräfte.pdf](#) – in which the considerations “human agency, fairness, humanity, and justified choice” are set forth as the basis for a reflective ethical assessment of the use of AI.

support, the integration of new AI tools. They are the point of contact for employees and students in their respective areas of responsibility regarding the use of AI tools. Researchers, teaching staff, and specialists receive support in matters of information security and data protection, as well as expert advice on the evaluation, development, and implementation of AI systems.

- **BFH IT Services** support the provision, operation, maintenance and security of the AI tools officially provided by BFH. They ensure the integration of the systems into the existing BFH environment, as far as this is possible and useful, and continuously evaluate whether teaching, research and university operations have AI-specific requirements so that they can, where possible, adequately address them in the ongoing development of their infrastructures. For AI tools and platforms that are not officially provided by BFH, the respective users and developers of the AI tools and platforms are themselves responsible for their operation, maintenance and security.
- **Product owners of AI tools** are responsible for the use of the respective AI tools. They regularly evaluate the requirements of use and ensure that the requirements with regard to information security and data protection, as well as the efficiency and sustainability of the tools, are implemented.
- The **University Executive Board** adopts an AI policy, internal directives and support measures for skills development and decides on the available resources for the use of AI at BFH while establishing relevant governance and compliance structures.
- The **heads of Research and Teaching (education/continuing education) in the schools** ensure that the necessary communication takes place to ensure compliance with safety, ethics and quality standards, as well as the requirements set out in national and international regulations. They are supported by the product owners and the people who are responsible for digital teaching in the schools.

Quality assurance and further development

BFH conducts continuous quality assurance and further development of AI use in research and teaching with the following precepts in mind:

- **Open feedback culture:** The open exchange of experiences with AI should enable flexible adaptation of AI use based on new insights and support the joint development of innovative approaches.
 - **Continuing education and training courses:** Employees and students have access to continuing education to enhance their technical, ethical, risk-related and teaching skills in the use of AI tools.
 - **Use of open AI systems and open-source solutions:** BFH favours the use of open AI systems to foster innovation, improve interoperability and strengthen digital sovereignty. Researchers and teaching staff use open-source models whenever possible and make their own developments available under open licenses.
 - **Risk-based approach:** The use of AI systems is classified according to BFH's provisions governing data protection and information security in
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compliance with the EU AI Act⁹, using BFH's ISDP risk categories¹⁰. Planning and evaluation of the use of AI are carried out accordingly. If necessary, additional transparency and security measures are implemented, particularly for projects that pose a high risk to health, safety or fundamental rights.

- **Dynamic adaptation processes:** Based on feedback and new technological developments, AI tools used in teaching and research are adaptively updated to optimally take account of advancements and changing requirements.
- **Sustainability:** The continuous development of AI tools and processes is conducted with a view to resource optimisation, energy efficiency and social responsibility. Furthermore, the implementation of sustainable practices in research and teaching is actively supported to foster sustainable transformation in the respective fields.

Final provisions

The BFH AI policy applies to all employees and students. It will be reviewed and adjusted as needed to respond to new regulatory requirements, technological developments and scientific findings, ensuring high-quality, transparent and ethical use of AI in teaching, research, and university operations.

⁹ See *EU AI Act Proposal for a regulation laying down harmonised rules on artificial intelligence* (2021). Available at: [EU AI Act](#).

¹⁰ See Chapter 1 "Classification of information at BFH" in: *BFH classification – Handling data and documents at BFH in implementation of the BFH ISDP basic concept*, 5 July 2023. Available at: [BFH_Klassifizierung.pdf](#).

Glossary for the BFH AI policy

- **Adaptive learning materials:** Learning materials tailored to individual learning types that adapt to the specific needs, abilities and progress of the students (e.g. a mathematics learning tool with personalised adjustment of the learning level).
- **Automated feedback:** Method in which AI-supported tools provide immediate feedback on the learners' performance and answers (e.g. instant, personalised feedback on correct and incorrect solutions in online testing systems).
- **Provisions on data protection and information security:** At BFH, these provisions are based on:
 - o The legal provisions (the Information Security Act and (primarily) the Cantonal Data Protection Act as well as the Directive on Information Security and Data Protection (ISDS DV), as well as the GDPR (EU), Federal Act on Data Protection and corresponding regulations) and
 - o Internal regulations and directives, namely:
 - The BFH Policy on Information Security and Data Protection (ISDP)¹¹
 - BFH ISDP basic concept¹²
 - Directive regarding Use of IT Resources at Bern University of Applied Sciences¹³
 - Directive on the disposal of media and the prior treatment of information at the Bern University of Applied Sciences¹⁴.
- **CISO (Chief Information Security Officer):** The officer for information security at BFH. The CISO advises on information security issues and defines security measures, assesses their effectiveness and suggests improvements.
- **Data protection:** Identification and addressing of risks arising from the processing of personal data to ensure appropriate protection.
- **DPO (Data Protection Officer):** The officer for data protection at BFH. The DPO advises on data protection issues. The DPO defines data protection measures, assesses their effectiveness and suggests improvements.
- **University operations:** The term university operations encompasses all processes, services and infrastructure that are necessary for the operation and administration of BFH and that support the provision of services in teaching and research (e.g. management, communication, library, IT, buildings, laboratories, finance/controlling, HR, administration).
- **Information:** Data that is stored electronically or physically, processed and/or transmitted. If the data relates to an identified or identifiable individual, it concerns personal data within the meaning of data protection laws.
- **Information security:** Identification and addressing of risks arising from the processing of information (including personal data) to ensure appropriate protection.
- **ISDP:** Acronym for "information security and data protection".
- **ISDP officer:** CISO (Chief Information Security Officer) and DPO (Data Protection Officer) at BFH.
- **ISDP coordinators:** People in the schools who are responsible for ISDP matters and questions.

¹¹ *BFH Policy on Information Security and Data Protection*, 2 May 2023. Available at: [BFH_Richtlinie.pdf](#).

¹² *BFH ISDP basic concept – Implementation provisions for the BFH Policy on Information Security and Data Protection*, 5 July 2023. Available at: [BFH_ISDP_Grundkonzept.pdf](#).

¹³ *Directive regarding Use of IT Resources at Bern University of Applied Sciences*, 1 January 2021. Available at: [BFH_IT-Ressourcen_Weisung.pdf](#).

¹⁴ *Directive on the disposal of media and the prior treatment of information at the Bern University of Applied Sciences*, 1 January 2021. Available at: [BFH_Entsorgung_Datentraeger_Weisung.pdf](#).

- **ISDP risk categories:** Classification of projects based on probability of occurrence and qualitative effects of damage in three stages: green (low), orange (medium), red (high).
- **Information security and data protection standards (ISDP):** Information security and data protection specifications, particularly from the BFH Policy on Information Security and Data Protection ISDP and the BFH ISDP basic concept.
- **AI platform:** Technological infrastructure or system that enables the development, implementation and operation of AI tools. An AI platform can process models and data, as well as support the execution of AI applications (e.g. Google AI, Microsoft Azure AI).
- **AI systems** (including open AI systems): Overarching term for all systems based on AI to automate decisions or actions. This includes both AI tools and AI platforms. Open AI systems are a special category whose source code is publicly accessible.
- **AI tools:** Software applications or technologies that use AI to support or automate tasks, such as machine learning, voice processing, image analysis and decision-making (e.g. chatbots, automated translation, intelligent tutoring systems).
- **Artificial intelligence (AI):** Sub-field of computer science that gives machines the ability to perform tasks that traditionally require human intelligence, such as learning, problem-solving and decision-making. This includes technologies such as machine learning, neural networks and natural language processing.
- **Product owner (PO):** Person responsible for a deployed object (information, application, IT system, network, infrastructure). This person ensures appropriate risk management in relation to information security and data protection.
- **Academic integrity:** The use of AI tools at BFH is carried out in accordance with the scientific integrity regulations at BFH (WissIR).