2025 Governance of artificial intelligence and data in Australasian tertiary education: A snapshot of policy and practice

An ACODE Whitepaper
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Introduction

This whitepaper is a follow-up of the Australasian Council of Open and Digital Education (ACODE) survey in 2024 on the governance of artificial intelligence (AI) and data in Australasian higher education (Selvaratnam, Ames & Leichtweis, 2024). Last year's results showed that the sector was in the earlier stages of maturity, while the latest survey, conducted in the second half of 2025, shows growth in operationalising AI. The survey assesses the extent to which institutions have advanced their AI strategies, promoting social and emotional well-being, psychological safety, and strengthening ethical and data governance. To this end, the JISC AI Maturity Model for Education is used to gauge the sector's growth in the governance of AI and data, both in policy and practice. The outcomes show that the sector has made progress in the last 12 months. The challenges were mainly resourcing constraints and a lack of systemic governance.

Background

Since the last survey, there have been several regional developments, including the launch of Australia's National AI Plan (Department of Industry, Sciences and Resources, 2025) and New Zealand's Strategy for AI (Te Kāwanatanga o Aotearoa, 2025). There are calls to action for the Pacific Islands to reboot regional AI leadership (Brimble et al., 2025). Higher education is at a crossroads in assuring learning with guidance for the region (Dollinger et al., 2025) and sector initiatives on an Australian framework for AI in higher education (Lodge et al., 2025).

The JISC (2025) AI Maturity Model (Figure 1) has been used in the annual ACODE surveys since 2024, to gauge where the sector was placed in this emerging space of generative AI with the essential data components that support it. Since then, ACODE has sought to separate AI from data maturity as the latter tends to be more mature in institutions[1]. The survey comprised 12 questions and was distributed to the 52 member institutions for completion over September and October 2025. A total of 40 institutional responses were received, representing a 77% response rate and encompassing tertiary education institutions across Australasia. Representative responses came from a diverse range of roles,

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[1] This is consistent with the approach to data and AI governance promoted within corporate governance generally. See, as an example, The Australian Institute of Company Directors report - *A Director's Guide to AI Governance,* Governance of AI Part 2: A director's guide to AI governance.

including education technologists and pro-vice chancellors. Since the last survey in 2024, some questions have been modified or added to reflect current concerns and provide clearer data collection.
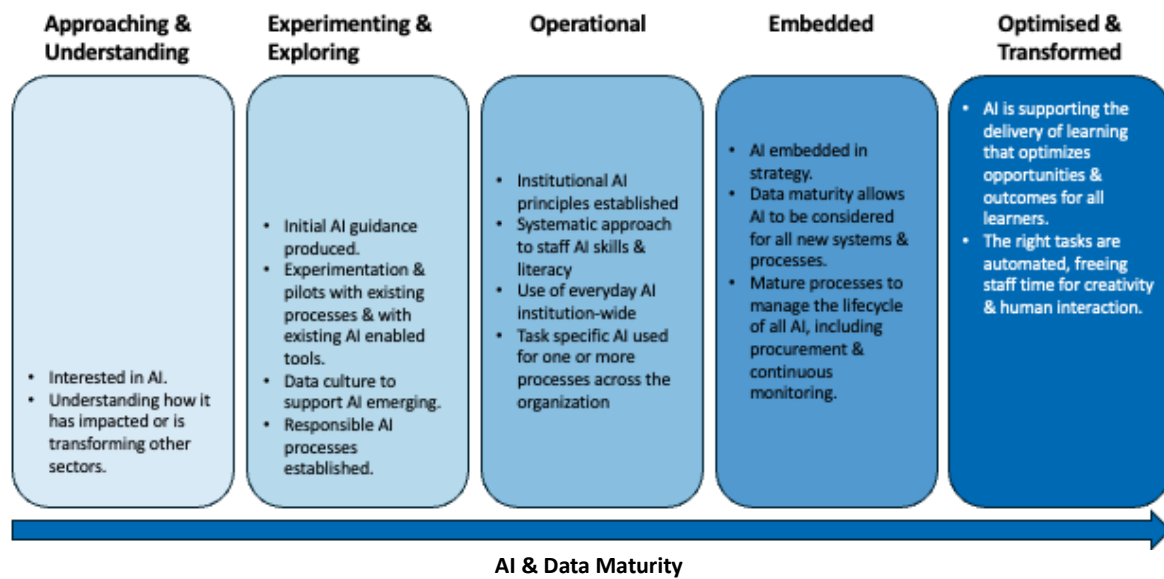

Figure 1 - JISC AI & Data Maturity Model

The survey outcomes in this whitepaper are shared with members through the ACODE forum and workshops to inform institutional decision-making. This paper is also shared publicly for international benchmarking.

Findings

The survey findings are important for informing where the Australasian tertiary sector has progressed in adopting AI and data governance maturity.
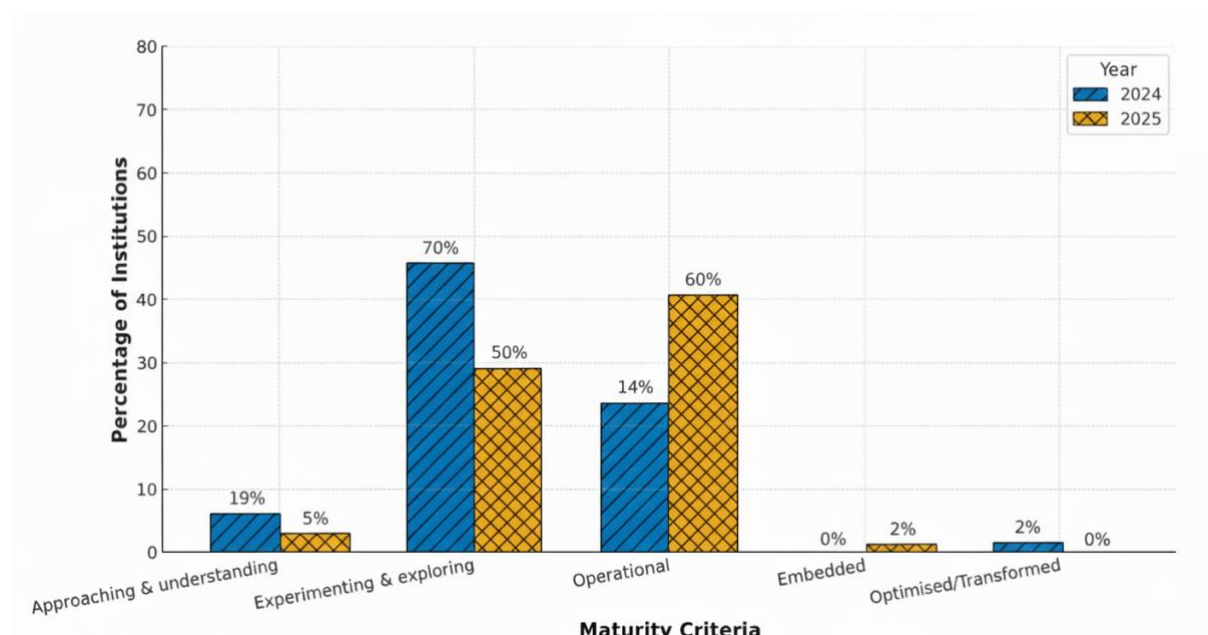

Figure 2 - Institutional self-rating against JISC's AI & Data Maturity Model 2024 vs 2025

Figure 2 shows that between 2024 and 2025, institutions moved increasingly from experimenting to an operational maturity in AI and data governance. There was a 29% increase in operational maturity, showing the sector is transitioning from pilots to more structured and applied AI use.

Respondents outlined several reasons for their self-rating. Some were confident in having ethical AI frameworks and institutional principles in place, along with advanced data governance, indicating higher maturity. AI tools are starting to be integrated into teaching and learning. AI literacy and capacity-building efforts are underway for both staff and students. There is more readiness for systematic implementation and evaluation, including agentic workflows, which are under exploration at several institutions. Figure 3 shows the challenges that remain in moving to higher levels of maturity. Resource constraints are cited as the biggest barrier by 35% of the respondents. It is closely followed by 28% citing systemic governance issues. Therefore, the main challenges are strategic and structural, rather than technical, indicating where leadership attention is most needed.
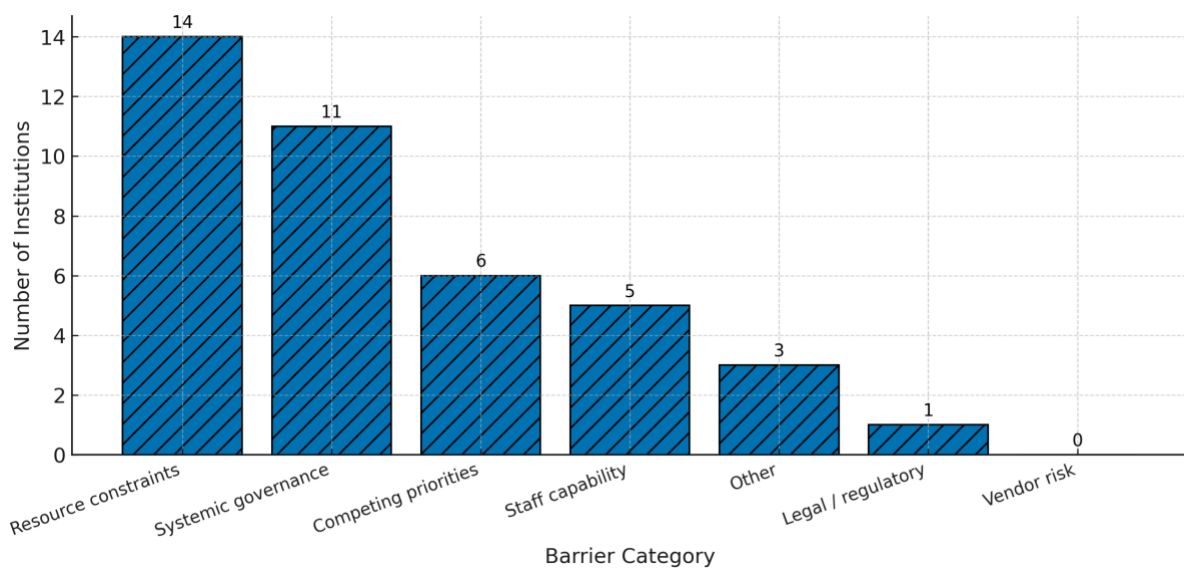

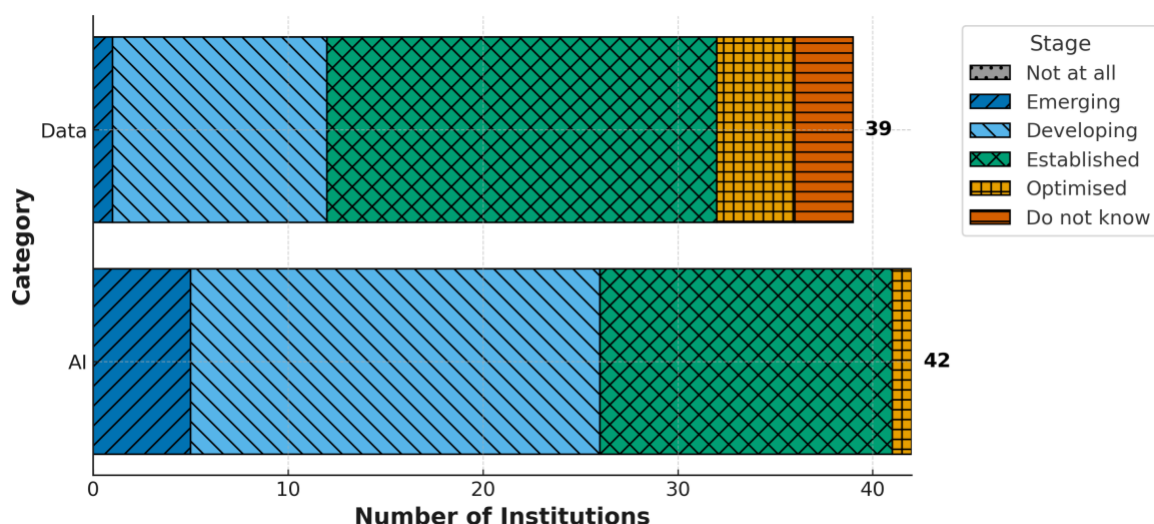Figure 3 - Barriers to moving to the next step in the Maturity Model

Figure 4 - Extent of ethical considerations for the use of generative AI and data

In Figure 4, it is evident that data ethics practices are more established than AI ethics, which is still developing across institutions. In the majority of institutions, data ethics approaches were already

established (50%), while ethical approaches to AI were still developing in 53% of institutions. **Ethical awareness is growing, but AI governance frameworks must mature to keep pace with adoption.**
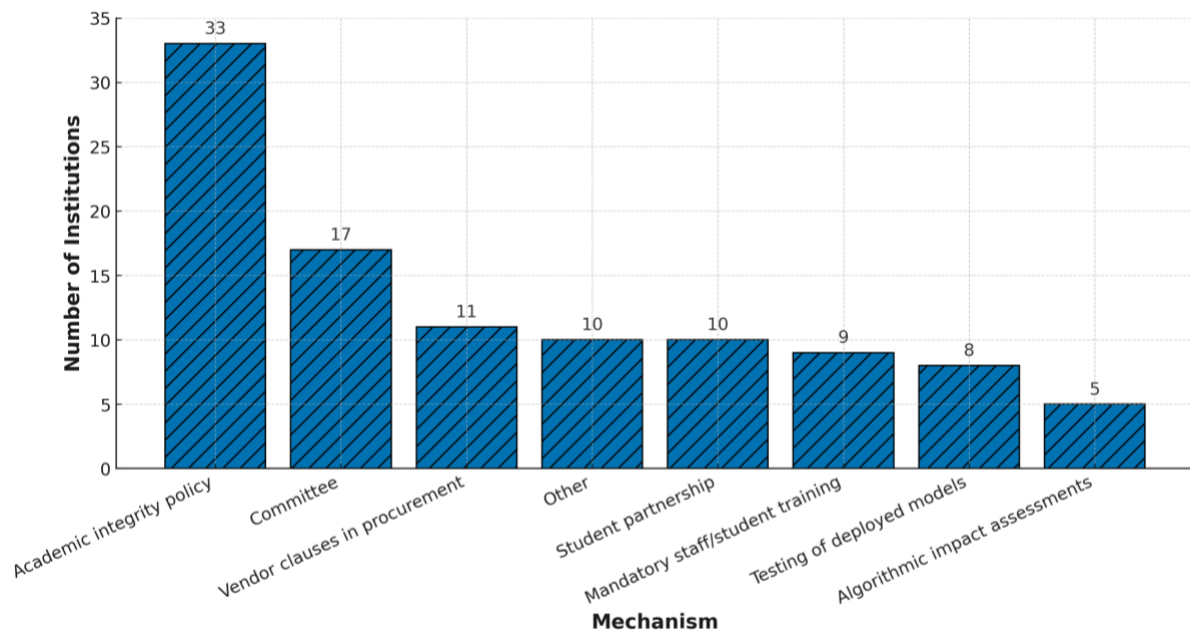

Figure 5 - Mechanisms used to operationalise AI ethics

Figure 5 shows the mechanisms used to operationalise AI ethics in institutions. 83% of institutions favour policy-led approaches through academic integrity policies and committees**.** However, technical mechanisms, such as algorithmic impact assessments, remain underdeveloped. This highlights a gap in operational governance.
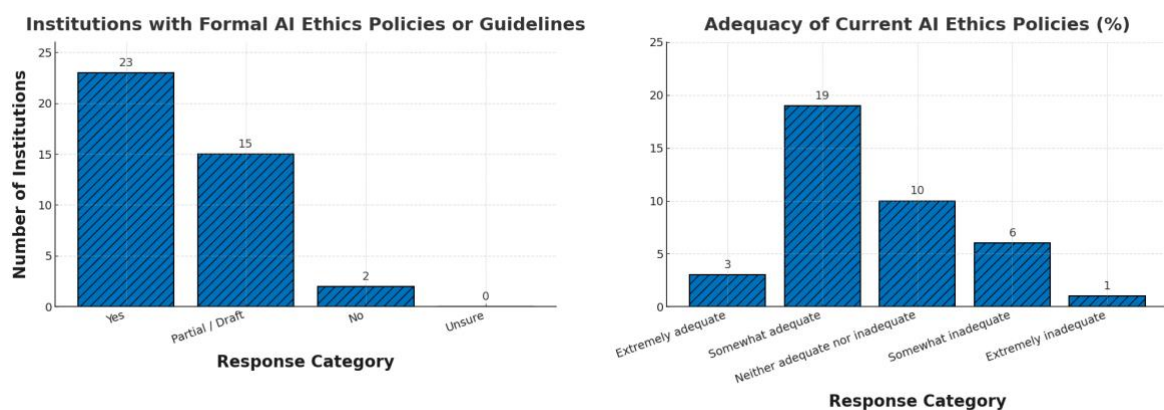

Figure 6 - Institutions with formal AI ethics policies/guidelines and their adequacy

Figure 6 shows that 58% of institutions have formal AI ethics policies or guidelines, while 38% are still in development. However, only 55% indicated they were adequate. There is significant room for strengthening implementation and impact.
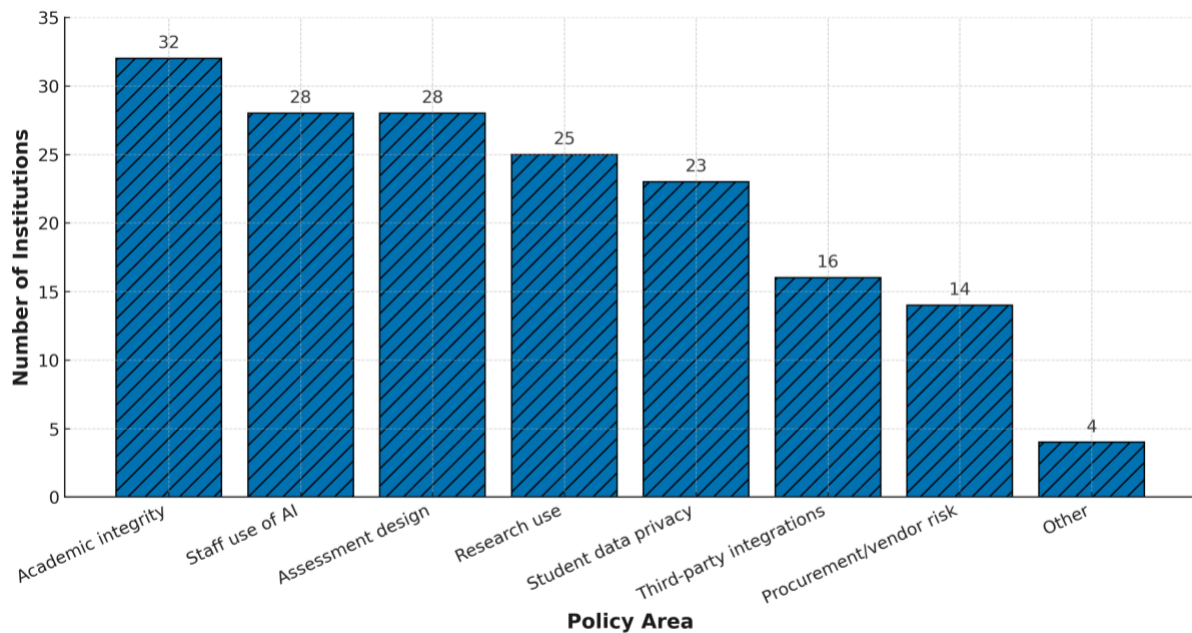
Figure 7 - Areas covered in formal AI policies and guidelines

Institutions' formal AI policies are most commonly focused on academic integrity (80% of respondents), staff use of AI (70%), and assessment design (70%), as evidenced in Figure 7. Fewer policies address areas such as vendor risk or third-party integrations, suggesting that ethical guidance remains strongest in learning and teaching contexts, but leaving potential gaps in operational governance. Key themes from other considerations listed by respondents include acknowledgement that high-level frameworks exist, but there are still challenges with operationalising them, especially when some are incomplete. Training disparity between staff and students was also identified as a challenge, along with a lack of holistic institutional implementation and enforcement of ethics.
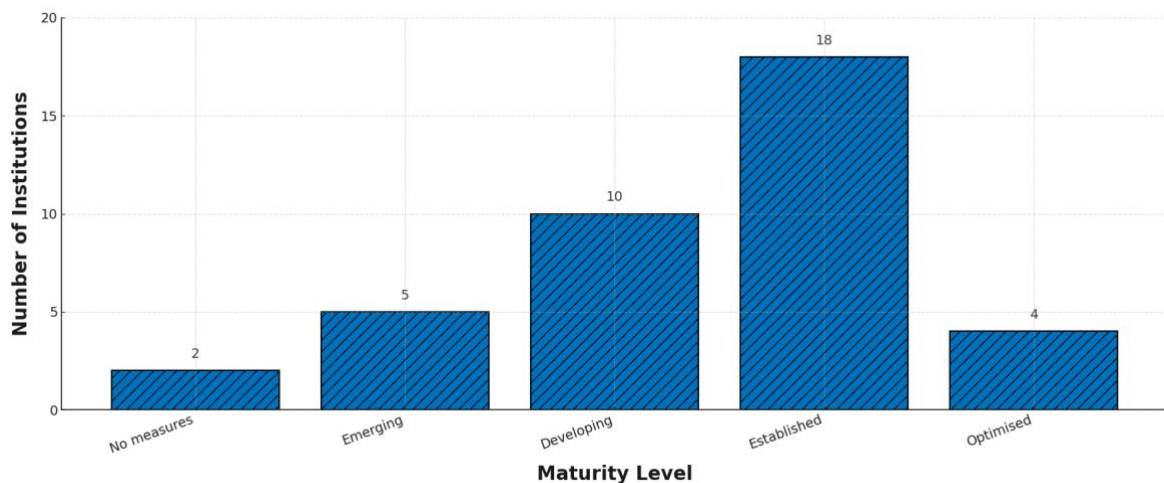

Figure 8 - Measures in place to ensure compliance with data protection and privacy laws when integrating generative AI tools and platforms

Seventy per cent (70%) of institutions have reached developing or established levels of data protection in generative AI contexts. However, as can be seen in Figure 8, progress is evident, but very few are fully optimised. This indicates room for advancement.
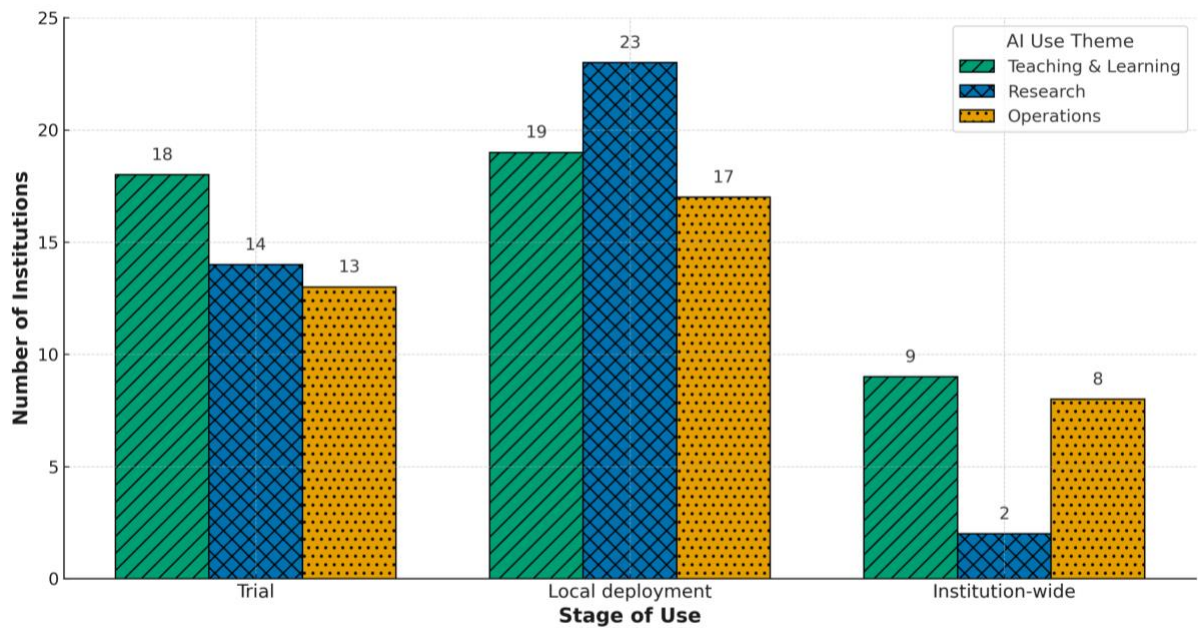
Figure 9 - Ways AI is being used in institutions

Figure 9 illustrates how AI is being used across teaching and learning, research, and operations, whether through trials, local deployment, or institution-wide implementation. It appears Innovation is happening close to classrooms and labs, with most AI activity at the local deployment stage. Institution-wide adoption remains limited, signalling where future scaling efforts should focus. This would likely entail moving successful pilots to the enterprise level.
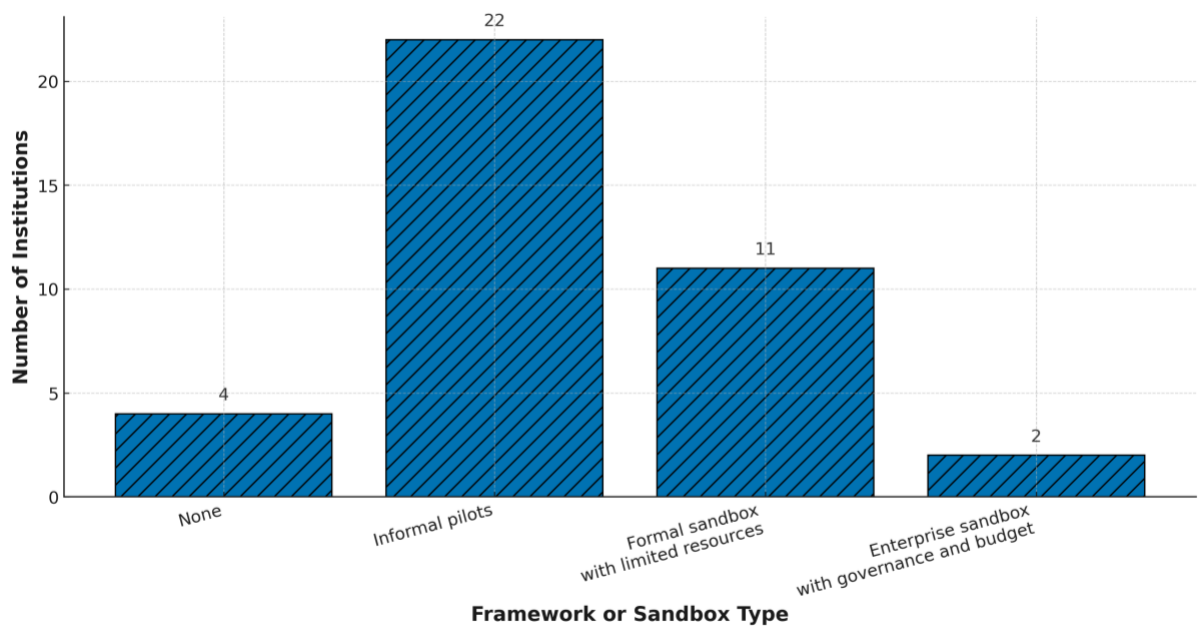

Figure 10 - Institutions with frameworks or sandboxes for AI experimentation

A little over half of all institutions, operate informal pilots rather than structured experimentation environments (Figure 10). Only a handful have advanced to formal or enterprise-level sandboxes, suggesting that well-resourced, systematic approaches to AI experimentation remain the exception. Respondents identified specific applications of AI or projects currently being used in their institutions, namely the active integration of AI across teaching, learning, assessment, and research, with a growing emphasis on the ethical and responsible use of AI. Institutions are piloting tools like Microsoft Copilot, Cogniti, SPARK, Lumi Tutor, and Studiosity to support personalised learning, staff productivity, and

curriculum innovation. AI agents are being developed for student support (e.g. AILA, Stop 1 Assistant), academic content creation, and simulation-based learning. Assessment reform is a key focus, with frameworks such as the Two-Lane model and guidelines for ethical AI use. Staff development encompasses workshops, symposia, and communities of practice aimed at building AI literacy and pedagogical capabilities. Student engagement is supported through mandatory academic integrity modules, peer learning, and AI literacy activities. Research support includes guidelines and pilots for responsible AI use, though some institutions are still developing their research capacity. Administrative infrastructure includes secure cloud platforms, AI chatbots, and learning analytics integration. Sector-wide benchmarking and collaboration are helping institutions navigate the adoption of AI.
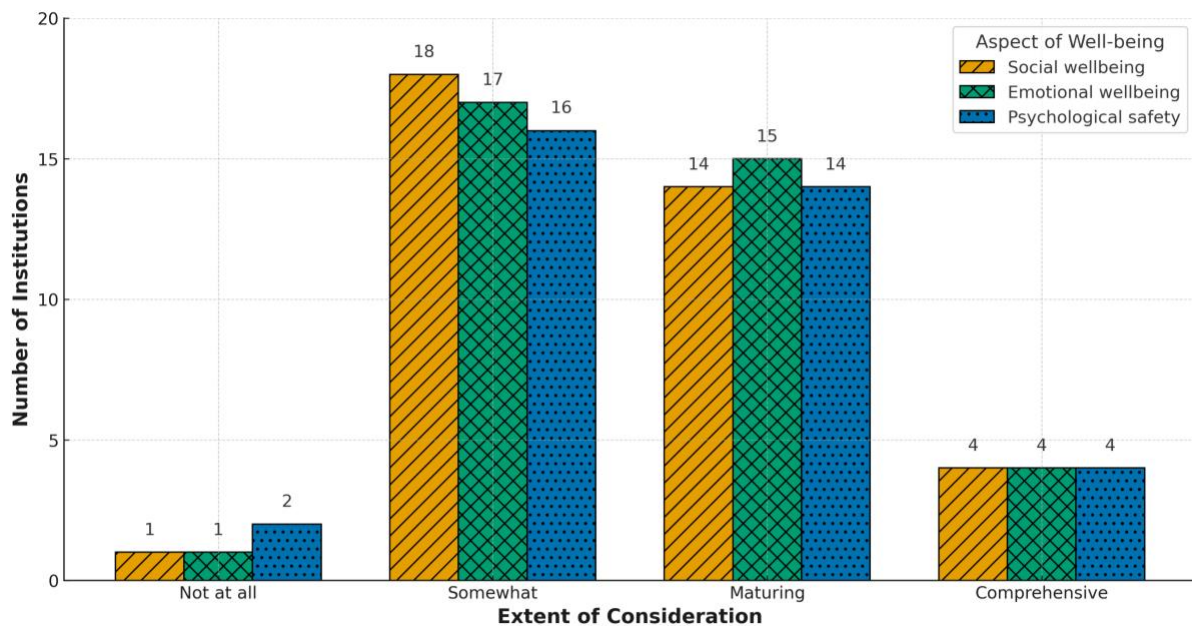

Figure 11 – The extent institutions have considered the well-being of learners engaging with AI

Figure 11 reflects important institutional considerations of AI's impact on learner well-being across social, emotional, and psychological dimensions. However, most remain in development rather than having comprehensive frameworks (only 10%), indicating this critical area needs stronger focus.
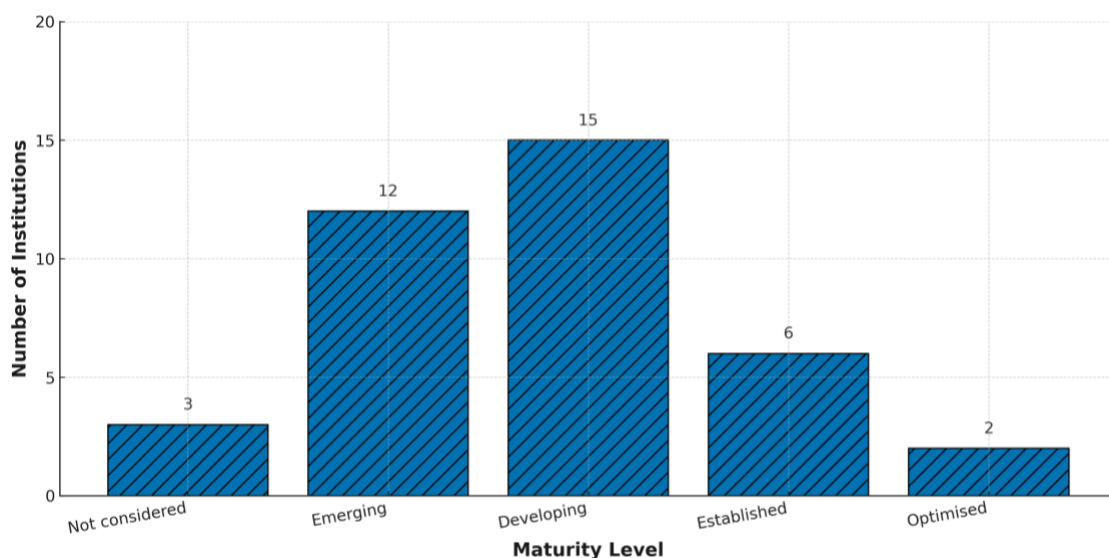

Figure 12 – The extent equity and accessibility are explicitly considered in institutions' AI strategy, procurement and deployments

While awareness of inclusive design principles is increasing, Figure 12 shows the sector is predominantly , still developing approaches to equity and accessibility in their AI strategies, with only 5% of respondents optimised in this area. This gap between policy intent and practical implementation requires urgent attention.

Conclusion

Several themes emerged in respondents' final comments. They generally were of the view that Australasian universities are progressing toward more coordinated and ethical approaches to AI and data governance. Institutions are prioritising policy development, staff capability building, and transparent oversight to ensure responsible AI integration across learning and research. Some institutions offer detailed resources and guidelines, though broader institutional or sector changes have impacted momentum. Inclusive design and community engagement are highlighted approaches, leading with a comprehensive, human-centred governance framework that balances responsible experimentation with compliance. Other institutions are undergoing transformation, affecting governance and leadership capacity. While some universities lack unified strategies or are slow to engage due to resource constraints, there is a growing awareness of the risks associated with inaction. Many are aligning with national regulatory guidance and participating in sector-wide benchmarking. Despite varied maturity levels, the shared commitment to ethical literacy, academic integrity, and inclusive AI use is evident. The focus remains on balancing innovation with responsibility, especially in assessment and learning, as institutions prepare for broader AI adoption in 2026 and beyond. The JISC AI Maturity Model provides a valuable lens through which to interpret these findings. While institutions demonstrate encouraging progression rightward along the maturity continuum, the concentration of responses in 'developing' rather than 'established' or 'optimised' categories suggests the sector requires more structured approaches to advance maturity at the pace demanded by both technological evolution and stakeholder expectations for responsible AI adoption. This Whitepaper proposes three recommendations for next actions:
1. Operationalise ethical frameworks and policy/guidelines on AI and data governance.
2. Plan for enterprise-wide adoption of systems with adequate resourcing.
3. Intentionally design the use of AI systems to include wellbeing, equity and access of staff and students.

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