

Policy analysis of higher education institutes in Ontario, Canada: A focus on artificial intelligence

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Abstract

This study examined the current state of academic integrity policies addressing the use of artificial intelligence (AI), specifically generative AI (GenAI), within publicly funded higher education institutions in Ontario, Canada. Amid the rapid proliferation of AI use across the sector, a regulatory gap persists at provincial and federal levels, contributing to varied institutional responses. Adapting Bretag et al.'s (2011a; 2011b) framework for policy analysis, we analyzed 19 academic integrity policies that reference AI and 1 standalone artificial intelligence policy. Our findings revealed a cautious and inconsistent sector-wide approach characterized by limited specificity, ambiguous responsibility, and limited support for AI competency development. Based on the findings synthesized in this review, we offer recommendations for AI policy and practice.

Keywords

artificial intelligence, academic integrity, Canada, higher education, Ontario, policy

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Introduction

The widespread use and popularity of generative artificial intelligence (GenAI), heralded as a creative yet disruptive force, has created extensive discourse and debate regarding its applications, ethical implications, benefits, and challenges when used within higher education (HE). The debate surrounding the use of artificial intelligence (AI)—specifically, GenAI—in HE is indeed complex. Advocates argue that AI can be leveraged within HE to optimize and/or automate various workload processes, including curriculum development and administrative tasks (Li & Jan, 2023). It also has the potential to address inequities by facilitating personalized learning and enhancing accessibility (Rasheed et al., 2025). However, these opportunities are tempered by growing ethical and practical concerns, including threats to data privacy, the erosion of secure learning, potential copyright infringements, and algorithmic biases that may marginalize and fail to represent diverse ways of knowing (Arora et al., 2023; Corbin et al., 2025). Additionally, emerging evidence shows that the energy requirements of GenAI technologies may pose significant threats to environmental sustainability (Bashir et al., 2024).

In response to these complex challenges and opportunities, scholars and practitioners have called for the development and implementation of institutional policies governing the use of GenAI to support responsible, safe, and ethical adoption across HE. Such policies can help mitigate risks associated with academic misconduct and unethical use, while reinforcing the important role humans play in protecting the common good (Chan, 2023; Ghimire & Edwards, 2024; Stracke et al.,

2025). Establishing clear and consistent guidelines via policy may offer a path forward for institutions to proactively and critically respond to the ethical and pedagogical challenges posed by GenAI.

This paper examines the current policy landscape for AI use in publicly funded universities and colleges in Ontario, Canada, with the hopes of contributing to the expanding body of research on AI governance in HE. We acknowledge that the term AI is used to broadly include GenAI. Our review was designed to examine institutional policies that address AI use, with particular attention to the growing concerns and implications associated with GenAI. References to AI throughout the paper, therefore, include considerations related to GenAI, reflecting its increasing significance in educational practice and policy.

Research Question

The following research question guides this inquiry: How is the problem of student academic misconduct, as it relates to the use of GenAI, represented in the policies of publicly funded Ontario HE institutions?

Background

As the use of GenAI technologies becomes increasingly prevalent in HE, institutions face the complex challenge of adequately governing their use. Ghimire & Edwards (2024) argue that AI-specific policies are not only essential but central to ensuring the ethical integration of AI into educational sys-

tems, practices, and policies. In an international review, the United Nations Educational, Scientific, and Cultural Organization (UNESCO) categorized institutional approaches to AI policy development into three types: *independent* (standalone AI policies), *integrated* (wherein AI elements are embedded within existing technology policies), and *thematic* (policies addressing focused topics and issues on AI in education) (Fengchun et al., 2021). Our review found only one standalone policy, which will be discussed in further detail later. UNESCO also emphasizes that the move to more “equitable and effective education systems” requires not only a sound infrastructure but strategies for its governance (*Artificial intelligence and its role in education policies*, 2025, para. 3). It has been suggested that policy plays a critical role in governance and equipping students and educators with the knowledge and skills required to navigate and use AI ethically in their academic work (Chan, 2023). Chan (2023) argues that current policy approaches across the HE sector fail to recognize and adequately address the transformative impacts of AI on teaching and learning. She noted that, at the time of her study, educational institutions had not sufficiently funded, regulated, or explored the ethical implications of AI in pedagogical and operational practices and contexts.

Beyond threats to academic integrity, emerging ethical concerns include threats to student privacy and social interaction, inequitable access to AI tools, and the risk of learner overreliance on AI technologies (Vieriu & Petrea, 2025). Another concern is that students may graduate unprepared for professional environments that increasingly expect competency related to the ethical and proficient use of AI (Stracke et al., 2025).

Policy

Although *policy* as a concept is difficult to define (Al’Abri, 2015), we borrow the Canadian Heritage Information Network’s (CHIN) (2021) definition of policy as “a set of statements of principles, values, and intent that outlines expectations and provides a basis for consistent decision-making and resource allocation in respect to a specific issue” (para. 1). Within the context of HE, policies establish clear frameworks for institutional processes and procedures, addressing key issues and goals related to governance, access, quality, equity, and institutional performance. Typically featured as formal documents or directives, they serve as a form of communication for those working, studying, researching, and learning within institutions (Meek, 2020; Nudzor, 2009). This study reviews policy documents to identify language about the use of GenAI in academic settings.

Literature Review

The body of literature on AI policy in HE continues to develop. In a review of 15 policies from eight European countries, Stracke et al. (2025) found that AI-specific policies were

difficult to find and largely undeveloped. That is, most universities have not yet developed or published policies supporting the ethical use of AI. Where policies do exist, they are either organized at the institutional level, through consortia, or via government agencies. The authors noted that the existing AI policies adopted one of two approaches:

1. *Passive*: Includes language dictating how students should adopt AI based on external factors.
2. *Proactive*: Includes language encouraging students to adopt AI as a partner in the learning process.

Stracke et al. (2025) stated a need for an AI Readiness Index tool to guide ethical, effective, and responsible adoption in HE. They suggested that such an index should be specific to HE and assess AI adoption, use, and impact. They further noted that while the Oxford Government AI Readiness Index provides a general framework with three pillars—technology sector, data and infrastructure, and government—it lacks transparency, may contain biases, and does not address education-specific needs. Developing an education-focused index would help evaluate progress and ensure responsible AI integration in teaching, learning, and research. It is important to note that effective policy development relies on the meaningful inclusion of stakeholders who possess AI literacy. Such literacy should support the grounding of policy that considers the opportunities, risks, and ethical considerations associated with using AI technologies in education.

Looking at the United States, Kim and Wu 2024 reported that 44.5% of HE institutions they reviewed ($n = 101$) had AI-specific policies. Within that percentage, certain types of institutions were more likely to have policies: those that offered doctoral degrees and reported high rates of research activity, as well as baccalaureate colleges with Arts and Sciences programs (40% within that subgroup). The authors suggest that this trend may reflect the influence of programs that emphasize applied ethical practice.

In another U.S.-based study, McDonald et al. (2024) analyzed 116 HE institutions with policies or documents related to AI use. They found that 63% encouraged AI use and 41% provided clear guidance for use in learning environments. Researchers described how AI documents that accompanied policies were being employed to inform instructors and students about suggested AI syllabi statements, pedagogical approaches, types of recommended AI tools, potential ethical issues, and other general guidance.

While research on AI in education is growing, there remains a notable gap in established frameworks specifically designed to construct AI-related institutional policy. No dedicated tool or guide to assess AI-specific policy could be located in the current literature. However, Bretag et al.’s (2011a; 2011b) academic integrity policy assessment framework, which has been used in several national analyses of academic integrity policies (Cullen & Murphy, 2025; Miron et al., 2021; Moya

& Eaton, 2024; Stoesz et al., 2019; Stoesz & Eaton, 2022) and contract cheating (Stoesz et al., 2019; Stoesz & Eaton, 2022), offers a useful foundation that can support AI policy review efforts. The framework outlines five key categories for policy review: *Access*, *Approach*, *Responsibility*, *Detail*, and *Support*. Within the scope of this study, we adopt Bretag et al.'s (2011a; 2011b) framework as a guide for policy analysis.

Methods

Data Collection

This study employed policy document analysis as a qualitative method (Bowen, 2009) to examine how the use of AI is represented through policy at publicly funded educational institutions in Ontario designated as either *University* or *Technical and Vocational* by the Government of Canada (Employment and Social Development Canada [ESDC], 2025, July 15).¹

Policy documents were identified via a systematic search of 49 institutional websites using the keywords *academic integrity policy*, *artificial intelligence (AI)*, and *generative artificial intelligence (GenAI)*. The search aimed to locate standalone policies addressing AI, as well as academic integrity policies that included references to AI. Policies available in both English and French (Canada's two official languages) were included. The dataset, collected between January and May 2025, included policies from 22 English-language and 3 French-language universities and 22 English-language and 2 French-language technical and vocational colleges (see Table 1).

Analytical Framework

The conceptual framework for academic integrity policies outlined by Bretag et al. (2011a, 2011b) served as the foundation for the analysis. The framework consists of five categories:

1. *Access*: Describes policy conciseness, ease of access, ease of reading, and clarity of process.
2. *Approach*: Describes policy framing and representation of academic integrity so the purpose, values, and intent are clear and positive, not punitive.
3. *Responsibility*: Describes policy articulation of stakeholders' roles and responsibilities in upholding academic integrity, specifically regarding who is responsible for what at individual, organizational, and other levels of educational institutions.
4. *Detail*: Describes policy explanations of what constitutes a breach, how breaches are recorded and reported, how breaches are detected, and potential breach penalties.
5. *Support*: Describes policy explanations of embedded and integrated systems used to manage breaches and

provide education about academic integrity to minimize violations.

While this framework is comprehensive, it was incomplete for our purposes. The *Approach* category allowed for the identification of whether the policy employed language that was clear, positive, or punitive in nature, though it lacked sufficient depth to assess the broader communicative stance of the policy, specifically, how it positions AI use within educational contexts (e.g., as a risk, tool, opportunity, etc.). To meet this analysis gap, a sixth category, *Tone*, was added to capture variations in stakeholder sentiment. The addition of this criterion is significant, given the ongoing discourse about whether the use of AI is a tool to be regulated, integrated, punished, or encouraged within the scope of learning and assessment.

Data Extraction and Coding

At the time of review, two institutions had standalone AI policies, although on further analysis, the reviewers deemed only one policy to be a standalone AI policy (see Standalone Policies section). In addition to reviewing these standalone policies, academic integrity policies ($n = 49$) were reviewed for inclusion of language explicitly referencing AI within the context of academic integrity and misconduct.

Three extraction criteria were established to systematically identify and analyze how AI is addressed within the academic integrity policies:

1. *Policy Retrieval*: Measured by the number of clicks required to access policies from the institution's homepage.
2. *Relevance*: The academic integrity and/or AI policies' most recent review or update date.
3. *AI References*: Explicit mention of AI within academic integrity policies.

These criteria were selected to assess ease of access and currency of policies. Each policy document was systematically reviewed according to these criteria. Nineteen academic integrity policies explicitly referenced AI. For this subset, we applied the adapted Bretag et al. (2011a, 2011b) framework (see Table 2) to evaluate the representation of AI within policy language and structure.

To enhance the reliability of our analysis and minimize bias, both researchers independently conducted pilot coding of a subset of policies ($n = 4$). The results of the analyses were compared, and discrepancies were discussed until consensus was reached, enabling consistent application of the coding framework. For the full dataset, policies were divided between the two authors, one focusing on colleges and the other on universities. Coding decisions were reviewed collaboratively, and any discrepancies or inconsistencies were resolved through consensus. This iterative process helped ensure consistent

¹Educational institutions may fall under four possible designations in the province of Ontario: Junior College, Private Institution, Technical and Vocational, or University.

Table 1. Policy Corpus Overview

Feature	Universities	Technical and Vocational Colleges	Total
Total policies reviewed	25 (22 English, 3 French)	24 (22 English, 2 French)	49
Artificial intelligence policy	1*	1	2
Academic integrity policy with reference to artificial intelligence	9	10	19
Academic integrity policies without reference to artificial intelligence	16	14	30

* After further analysis, this policy was not, in fact, a standalone policy.

Table 2. Summary of Analytical Framework

Core Element	Definition
Access	Ease of access and clarity of AI-related language
Approach	Representation and integration of generative artificial intelligence within the broader context of academic integrity
Responsibility	Clear articulation of stakeholder roles in relation to AI use
Detail	Definitions, detection methods, reporting procedures, and sanctions related to AI
Support	Systems embedded to remediate, minimize re-offence, and promote education
Tone	Language used to describe and/or frame AI

interpretation and application of the coding framework across the policy corpus.

Artificial Intelligence Language in Institutional Policies

Policy Prevalence and Types

Of the 49 academic integrity policies reviewed, 19 explicitly reference AI (see Table 2). Standalone AI policies were rare; only two institutions—Seneca College and the University of Guelph—have published dedicated documents labelled as AI policies. In the following sections, we first discuss these standalone documents to illustrate how AI is addressed when institutions create focused policies. We then turn to the 19 academic integrity policies that reference AI to examine how emerging concerns about AI are being integrated into existing frameworks for academic conduct.

Standalone AI Policies

Unlike Kim & Wu (2024), our review did not find differences in the presence of AI policies by institutional type. Rather, AI-specific policy appeared to be limited across all institutional types (universities, colleges, and polytechnics), suggesting that focused, formal governance around the use of AI is still emerging in Ontario. We highlight two illustrative cases that represent the current range of institutional approaches to AI governance.

- **University of Guelph:** Upon review, the University of

Guelph’s policy functions more as a philosophical statement than a formal policy. It offers general reflections on the role of AI in education and directs readers to other departments for best practices (e.g., “We advocate for ethical and safe interaction with AI systems while maintaining individuality” (University of Guelph, 2025, para. 1). However, it does not meet CHIN’s (2021) definition of policy, which includes a clear statement of governing expectations and consistent directives for decision-making and operationalization. As such, we regard this document to be outside of the scope of *policy* and exclude it from further analysis.

- **Seneca College:** In contrast, Seneca College’s standalone AI policy provides a clear statement of expectations regarding the “responsible and safe use of GenAI in academic and operational contexts” (2024, para. 1). The policy is easily accessible and employs clear, precise language to define key terms. For example, *approved* and *unapproved* GenAI applications are differentiated, with clear definitions:

Approved GenAI applications include any software licenses, subscriptions, or tools where ITS and/or Teaching & Learning were consulted in the decision to allow use. An assessment of the vendor’s privacy and security practices, how GenAI is incorporated, and how it works, would have been completed for such applications. Unapproved GenAI applications include software licenses, subscriptions or tools acquired without consulting ITS and/or Teaching & Learning and without completing a privacy and security assessment (Seneca Polytechnic, 2024, para. 6).

Further, the policy explicitly delineates responsibilities for students, employees, and contractors, emphasizing adherence to institutional ethical standards and principles of equity, diversity, inclusion, and sustainability. Sanctions for misuse are outlined under a *Non-Compliance* section, supported by illustrative examples of unacceptable use, e.g., “It is a violation of Seneca’s policy to use Seneca credentials to log into publicly available genAI applications” (Seneca Polytechnic,

2024, para. 14).

While Seneca College’s policy does not explicitly situate itself within academic integrity discourse, it references a broad suite of related institutional policies, such as privacy, IT use, and respectful workplace policies, suggesting an integrated approach to ethical governance. This intertextual emphasis positions AI governance as part of a broader ecosystem of institutional responsibility, rather than as a standalone compliance exercise.

Additionally, Seneca College’s policy frames AI as an assistive technology aimed at enhancing efficiency while underscoring the importance of system safety, compliance, and ethical practice. Its tone fluctuates between educational and legalistic, implicitly reinforcing values such as honesty, fairness, and responsibility, which are core to academic integrity, even when these are not explicitly named. This dual focus is evident in language discouraging discriminatory AI outputs and referencing the institution’s broader ethical commitments.

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Although Seneca College’s policy does not include dedicated educational directives, it adopts an educative and risk-aware tone, highlighting legal, reputational, and third-party risks. By naming specific risks and corresponding behavioural expectations, the policy provides a “basis for consistent decision-making” (CHIN, 2021, para 1). For example, the policy specifies that GenAI outputs may be fictitious, directing stakeholders to “review output from genAI tools for accuracy to avoid placing Seneca at risk or harming institutional reputation” (Seneca Polytechnic, 2024, para. 9). This statement operates as a supportive safeguard in the context of Bretag et al.’s (2011a; 2011b) framework, identifying and articulating specific ethical behaviours to mitigate offence and promote preventative education.

Although Seneca College’s AI policy is primarily operational in nature rather than pedagogical, it nonetheless supports complementary educational goals by upholding core principles of

academic integrity—namely honesty, fairness, and responsibility—in the application of emerging technologies. Following this focused analysis, we now turn to the 19 academic integrity policies that explicitly reference AI. While these policies do not function as AI-specific governance instruments, they illustrate how Ontario HE institutions are beginning to respond to emerging concerns about AI within existing frameworks for academic conduct.

Academic Integrity Policies

Using the adapted Bretag et al. (2011a, 2011b) framework, we examine 19 academic integrity policies from 9 universities and 10 colleges across 6 categories to identify patterns in how AI is represented.

Access to AI Language within Academic Integrity Policy

All reviewed academic integrity policies that reference AI ($n = 19$) are publicly available online and can be located within one to five clicks from the institutional homepage (see Table 3).

Table 3. Access (Number of Clicks) to GenAI Language in Academic Integrity Policies

Institution Category	# of Clicks to Policy	# of Institutions
College	1	3
	2	2
	3	2
	4	3
Total		10
Universities	1	0
	2	7
	3	1
	4	0
	5	1
Total		9

Based on this review, access ease—as represented by the number of clicks required—appears generally more straightforward at colleges than at universities. However, across institutional types, language addressing AI is generally clear, free of jargon, and effectively communicates what constitutes dishonest or inappropriate use of AI.

To examine institutional approaches more closely, we compared how the 19 institutions framed AI misuse within their policies (see Table 4). While both institutional types sometimes subsume “AI misuse” under the broader categories of *plagiarism* and *contract cheating*, distinctions emerged in how these behaviours were contextualized. For example, the Northern Ontario School of Medicine introduced the term *aigiarism*, described as the use of AI tools “such as software-generated or writing apps to generate work [that] is unfair and considered an offence to academic integrity” (Mongeau,

Table 4. Types of Academic Misconduct Found in Academic Integrity Policies in Ontario’s Colleges

Institution Type	Key Distinction
Technical and Vocational Colleges	<ul style="list-style-type: none"> Frequently employ the term “unauthorized use” to describe AI misuse ($n = 5$). Three colleges include explicit statements of purpose and define AI misuse within the broader framework of academic misconduct. One college emphasized ethical practice and integrity, while the others framed AI misuse in terms of academic misconduct or departures from academic integrity
Universities	<ul style="list-style-type: none"> More frequently classify AI misuse as a distinct form of academic misconduct ($n = 6$). For example, the Northern Ontario School of Medicine introduced the term <i>aigiarism</i>, described as the use of AI tools “such as software-generated or writing apps to generate work [that] is unfair and considered an offence to academic integrity” (Mongeau & Cervin, 2023, p. 2). AI language is often embedded within specific components of academic integrity, suggesting a more integrated approach.

2023, p. 2). In college policies, the term *unauthorized use* was most frequently employed to describe AI misuse ($n = 5$), whereas universities more often classified it as a distinct form of academic misconduct ($n = 6$). Three colleges provided explicit statements of purpose and defined AI misuse within the broader framework of academic misconduct. One college emphasized ethical practice and integrity, while the others framed AI misuse in terms of academic misconduct or departures from academic integrity. In contrast, university policies tended to embed AI language within specific components of academic integrity, suggesting a more integrated approach.

Approach and Tone within Academic Integrity Policy

The tone and philosophical orientation of academic integrity policies that reference AI generally reflect a formal and constructive stance. Notably, the Northern Ontario School of Medicine extends its policy beyond enforcement by offering students practical guidance on the ethical use of AI in academic work.

Most institutions include broad introductory statements outlining the intent of their academic integrity policies; however, few extend this framing to explicitly contextualize AI-related content. Sanctions for breaches of academic integrity, including the misuse of AI, are articulated in both college and university policies. As seen in Table 5, differences emerge in how institutions balance legalistic and educational approaches.

Responsibility of AI within Academic Integrity Policy

The delineation of responsibilities regarding the ethical use of AI is generally undeveloped across current academic integrity policies. While explicit role definitions are not common, some institutions incorporate these responsibilities within broader academic integrity language. Two distinct approaches were observed: one that outlines roles in the context of responding to breaches and another that emphasizes collective responsibility for upholding academic standards. One university clearly and explicitly articulated the roles of both students and instructors in ensuring the appropriate use of AI. A clear

Table 5. Differences in Policy Approach

Approach Type	Findings
Collaborative	Two universities and two colleges ($n = 4$) explicitly emphasize a shared responsibility model, highlighting how upholding academic integrity is the responsibility of all academic community members, not only students.
Legalistic	Four colleges and five universities ($n = 9$) adopt a predominantly legalistic tone, focusing on compliance and consequences.
Integrated	Two colleges and one university ($n = 3$) blend legalistic and educative elements, signalling an emerging shift towards pedagogically informed, balanced approaches to AI regulation.

gap exists in sector-wide guidance, reflecting the need for a comprehensive and transparent articulation of responsibilities related to AI use.

Detail of AI within Academic Integrity Policy

Across institutions, most policies fall short of providing comprehensive details for this category’s the four dimensions: clear definitions, detection methods, procedures for reporting and appealing, and the use of visual aids. While several policies acknowledge AI misuse—often categorized within existing forms of academic misconduct such as plagiarism and contract cheating—few provide specific criteria or nuanced explanations of the specific actions that constitute a breach involving AI. Seneca College (notably, the only institution with a standalone AI policy) provides the most nuanced definitions, identifying both *undeclared AI use* and *unauthorized aid* as distinct violations related to AI misuse.

None of the policies reviewed offer concrete descriptions of how academic misconduct involving AI is identified. References to specific detection methods are absent. Only Seneca College indirectly addresses detection by stating that omission of an AI disclosure statement may serve as an indicator of

misuse. This lack of methodological transparency regarding detection suggests that HE institutions recommend reliance on case-by-case judgment or institutional discretion rather than formalized and consistent detection mechanisms.

Procedures for reporting, recording, and appealing AI-related violations are likewise underdeveloped and inconsistently included. In most cases, AI academic misconduct is integrated into existing reporting procedures, with no indication of how or whether these procedures are adapted to address the specific challenges of detecting and verifying AI misuse. Visual aids, such as flowcharts and tables (which are recommended for clarifying violation and sanctioning pathways), are sporadically included. When present, they typically align with general violation and sanctioning procedures.

Support for Remediation to AI Misconduct in AI Language Academic Integrity Policy

The inclusion of remedial or educative responses specific to AI misuse is absent across policies. While a range of support mechanisms (e.g., training, assignment resubmission, workshops, and remediation) are identified in both university and college contexts, they are not explicitly linked to AI misuse. Instead, support for AI misuse tends to be embedded within these existing support mechanisms, with no apparent tailoring or customization to the unique characteristics and challenges of AI use.

Discussion

Currently, only one provincial effort exists to support the incorporation of AI within education (Veletsianos, 2023). The province of Québec recently published two reference documents intended to guide HE with the integration and use of AI. Through a collaborative initiative, key stakeholders, including representatives from HE institutions, labour unions, student organizations, and experts in AI, were consulted. Under the Québec Minister of HE's leadership, this process resulted in developing a comprehensive framework that articulates guiding principles and a shared vision for integrating AI in HE. This framework, titled *Deployment and Integration of Artificial Intelligence in Higher Education*, reflects the outcomes of this provincial consultation. This foundational document is complemented by a second publication, which offers strategies and practical examples to support the implementation of effective AI governance across Québec HE institutions (Government of Québec, 2025).

Internationally, organizations like UNESCO advocate for ethical AI use and offer guiding frameworks, yet enforceable policies remain scarce. The lack of comprehensive institutional policies is unsurprising given that governments continue to struggle with regulation and policy related to the responsible use of GenAI. As Judge et al. (2025) suggest, this challenge may relate to "conflicting interests and institutional gridlocks at the heart of regulatory politics" (p. 86), compounded by the novel features of GenAI as a technology capable of processing

trillions of parameters. The uncertainty of HE institutions to develop AI policies may be due to a combination of structural, ethical, and practical challenges.

It is important to note that in Canada, HE legislation falls under provincial jurisdiction, as established by the Constitution Act, 1867. Each province and territory governs its own HE system, shaping policies related to governance, funding, and quality assurance. The federal government plays a limited, indirect role by supporting initiatives such as research funding, student financial aid, and Indigenous education, and by overseeing Canadian Military Colleges. It does not regulate HE institutions directly (Eastman et al., 2018). This individualized approach within Canadian HE results in a fragmented and inconsistent framework for addressing broader issues, such as establishing regulations, policies, and guidelines for the ethical integration of AI in academic contexts. Aside from Québec's work, this regulatory vacuum leaves provinces' institutions to independently determine their approach, leading to varied practices and limited accountability (Sebesta & Davis, 2023).

Sector-wide guidance should be developed through a federally coordinated and collaborative effort among provincial and national associations, in partnership with colleges, polytechnics, universities, educational quality assurance organizations, and other educational institutions, to ensure shared accountability and relevance across the HE landscape in Canada. Developing a cohesive national strategy is important to establish a comprehensive framework for GenAI governance in HE, thereby preventing fragmented, inconsistent policy responses.

Limitations

Given the rapid pace of AI development, the findings of this study should be interpreted as a temporal snapshot of the policy landscape, rather than a fixed account. Policies related to academic integrity and AI are in flux, and institutional responses are likely to evolve as these technologies mature and pedagogical practices are given adequate space to respond. Therefore, the findings reported here may quickly become outdated. They should serve as a baseline for future comparative analyses, helping to trace institutional responses to technological capabilities, public discourse, and regulatory guidance in the long term.

Additionally, this study is limited to the examination of existing institutional policies in Ontario, Canada and does not include the perspectives of key stakeholders, such as students, faculty, or administrators. As such, it does not capture the interpretive dimensions of how these policies are understood and enacted in practice. Future research might extend this initial work by considering how institutional policy shapes and is shaped by pedagogical practices and the perspectives of individual stakeholders.

Recommendations

Bretag et al.'s (2011a; 2011b) framework, with the added category of *Tone*, provided a comprehensive and inclusive lens that shaped our analysis. While the framework is effective for policy analysis, the categories must be considered together when offering the following practice recommendations to guide the development of AI policy language.

Recommendation 1

Thoughtful consideration should be given to where AI-related guidance is housed, ensuring it is accessible and available to community stakeholders and well-connected to broader institutional processes.

The sudden introduction of GenAI, following the emergency remote teaching practices necessitated by COVID-19, has intensified tensions within academic communities. The ongoing debate related to its ethical use, copyright infringements, privacy, accessibility, and algorithmic bias are just a few of the issues creating a lack of consensus, further complicating efforts to craft comprehensive and widely accepted policies. Compounding these challenges, some institutions operate under decentralized governance structures, where faculties and departments maintain significant autonomy. This fragmentation can hinder the development of institution-wide policies as units may have divergent views on the use of AI in teaching, learning, and research.

Recommendation 2

With learning at the core of work in HE, institutions should prioritize developing clear, fair, and transparent policies and/or procedures that address AI use comprehensively, while being attentive to discipline-specific nuances. Importantly, this should be a multi-stakeholder effort to ensure policies are practical, equitable, and adequately reflective of diverse perspectives across the institution.

Institutions should be cautious about implementing AI in ways that could exacerbate existing inequalities. Depending on socioeconomic factors, students may have less access to AI tools or may be disproportionately affected by automated decision-making systems used in HE processes, e.g., admissions and grading (Hoernig et al., 2024). We recommend institutions consider language in existing policies/procedures, such as privacy and digital use, when addressing inequities so they provide clear direction related to AI use in HE.

Institutions must also consider how policies/procedures guide HE community members' expected and essential human-centric behaviours, e.g., critical thinking, creativity, ethical judgement. Such behaviours are shaped by complex factors, including organizational culture, leadership, and structure (Bratton, 2021; Kumar et al., 2022). Clear and direct communication through policies/procedures is considered essential to promote ethical AI use and, by extension, will support student learning. A systems-based approach to policy/procedure language fosters collaboration and shared values, yet this

study found inconsistent articulation of collective responsibility across HE institutions.

Recommendation 3

Clear language that speaks to the ethical use and misuse of AI should be integrated into policy, so key stakeholders are informed of their responsibilities in upholding integrity and, by extension, safeguarding credential integrity.

In the current landscape, where standalone AI policies are rare, an expanded academic integrity policy to explicitly address AI use may offer a practical and scalable strategy. Bretag et al. (2011a, 2011b) emphasize that effective academic integrity policies must be accessible, i.e., easy to locate, read, and understand. While this speaks more to access to AI language, it is also important to consider that references to AI were indeed embedded within broader academic integrity policies, rather than in dedicated, standalone documents. This approach, in many cases, helped make policies relatively easy to locate using standard search terms and minimal navigation.

Recommendation 4

While a lack of standalone policies may initially seem like a gap, we recommend expanded academic integrity policies that include clear and accessible language related to AI use to fulfill essential informational needs for students and instructors.

An exemplary academic integrity policy should adopt an educative and developmental stance, clearly articulating expectations and responsibilities for all members of the learning community (Bretag et al., 2011a, 2011b). The argument can be made that the same principle should extend to policy language about the ethical use of AI. However, this review revealed inconsistencies in tone and approach, with institutions oscillating between educative, punitive, and legalistic language. Such variability may hinder comprehension, create a confrontational impression, and undermine the policy's effectiveness.

Recommendation 5

Institutions should undertake critical reviews of policy language to mirror their broader learning mission and philosophies, demonstrating how AI is one component (of many) in achieving these missions and commitments. Doing so requires not only clarifying what constitutes AI misconduct or misuse but also explicitly naming the responsibilities of all stakeholders (students, instructors, administrators, etc.), which can contribute to a community of responsibility for ethical AI use.

This review's findings suggest that in the current state, academic integrity policies often lack the depth and specificity required to adequately address the complexities of AI use and misuse. In many cases, references to AI are subsumed under existing categories of academic misconduct, such as *plagiarism* or *unauthorized aid*, with few institutions offer-

ing detailed definitions or actionable criteria for AI-specific misuse. This absence of clarity may leave both students and instructors uncertain about what constitutes inappropriate AI use. This ambiguity may risk unintentional misconduct and/or uneven and inconsistent enforcement across the institution.

This lack of transparency extends to detection and enforcement mechanisms. None of the policies reviewed provided clear descriptions of how AI misuse would be identified or proven. Without transparent and reliable procedures for detection, institutions rely on informal or case-by-case judgment, potentially leading to arbitrary enforcement, inequitable treatment, and diminished trust in integrity processes. However, in the current state, reliable detection procedures are scarce (Elkhataat et al., 2023; Kofinas et al., 2025; Perkins et al., 2024). The limitations of technology-enhanced detection systems (e.g., high false-positive rates and variability between tools) raise ethical questions around their use in misconduct decisions. In the absence of validated and widely accepted detection protocols, we recommend institutions proceed cautiously. Promoting unreliable detection procedures risks undermining stakeholder trust and may inadvertently penalize legitimate student work.

Recommendation 6

Institutions should focus their efforts on building preventative and educational supports that promote ethical AI use and advance AI fluency. This may include streamlined and consistent language for defining acceptable AI practices, professional development aimed at enhancing AI literacy, and integrating AI education in learner skills development.

To support the ethical and effective integration of AI in education, institutions should develop formal policies that articulate clear expectations and provide structured guidance for AI use across academic contexts. These policies must be grounded in a commitment to proactive, preventative, and educational strategies that promote ethical AI engagement and advance AI fluency. This includes establishing consistent language to define acceptable AI practices, offering professional development to enhance AI literacy among instructors and staff, and embedding AI education into learner skill development. Research underscores the ethical complexities of AI in education, such as data privacy, algorithmic bias, AI misuse, misinformation, and disinformation, which demand clear policy, proactive institutional frameworks, and pedagogical strategies (Garcia-López & Trujillo-Liñán, 2025). Instructors express a need for professional development to build confidence and competence in using AI tools, with studies identifying AI literacy as a critical factor in successful adoption (Mah & Groß, 2024). Integrating AI into curricula supports the development of essential *fifth industrial revolution* skills, including critical thinking, digital literacy, and ethical reasoning, preparing learners for a workforce increasingly shaped by AI technologies. A structured approach to AI education may help balance

technical proficiency with ethical and sociocultural awareness that can empower both educators and learners to engage with AI responsibly and effectively. Policy will help shape that path. Investing in good policy, strong educational support, and access to AI applications can help institutions mitigate risks and harness AI's transformative potential to enrich teaching and learning.

Conclusion

The global emergence of AI, sometimes termed the *fifth industrial revolution*, will require humans to work constructively and harmoniously with the technology. Policy can support these efforts by providing guidance and clear direction for its adoption. This study found that publicly funded HE institutions in Ontario have generally not responded to AI concerns with formal, standalone policies. Instead, references to AI use primarily appear as updates to existing academic integrity policies, perhaps reflecting a more cautious or incremental approach to regulation in this area.

This measured approach underscores the need for further policy development, which should be complemented by efforts to enhance user AI literacy. UNESCO's global survey found that fewer than 10% of HE institutions have formal guidance or institutional policies regarding the use of GenAI (*UNESCO survey: Less than 10% of schools and universities have formal guidance on AI*, 2023). This suggests a vacuum where policy has not kept pace with technological adoption or user awareness. While our study did not measure AI literacy, we should consider if and how this might affect the current AI policy situation in Ontario. UNESCO emphasizes that in advancing relevant policy frameworks, it is equally important to strengthen users' understanding of AI technologies, their capabilities, limitations, and appropriate applications (*UNESCO survey: Less than 10% of schools and universities have formal guidance on AI*, 2023). Such knowledge is essential to ensure AI policy is effective and meaningful to the institution. A central concern is that without sufficient knowledge among all users—students, instructors, and leadership—policy will either lag behind practice or be overly restrictive and hamper student learning. Enhancing AI literacy among HE stakeholders is therefore instrumental for developing informed, appropriate policy. In turn, clear policy is essential to ensure AI is effectively and ethically leveraged to support student learning within HE contexts.

At present, some HE institutions may appear to be integrating AI tools reactively, often without alignment to curricular objectives, faculty development, or policies (Digital Education Council, 2025). This may be a residual effect from the abrupt and sudden changes to HE post-pandemic that created disruption and chaos within learning institutions. While policy can play a valuable role in guiding post-secondary institutions toward a more unified, transparent approach for responsible AI use, a more impactful strategy may lie in engaging the HE learning community to build AI literacy.

By fostering informed and critical engagement with AI among instructors, students, and administrators, institutions can cultivate a culture of thoughtful integration. Completing these efforts with robust communication and a focused marketing strategy—one that clearly articulates institutional philosophies, available supports, and strategic approaches—can further enhance the ethical learning and focused adoption of AI. Such a comprehensive approach ensures the integration of AI remains aligned with the core mission of advancing student learning, supporting their career entry readiness to industries and professions that will expect competence with the ethical use of AI.

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