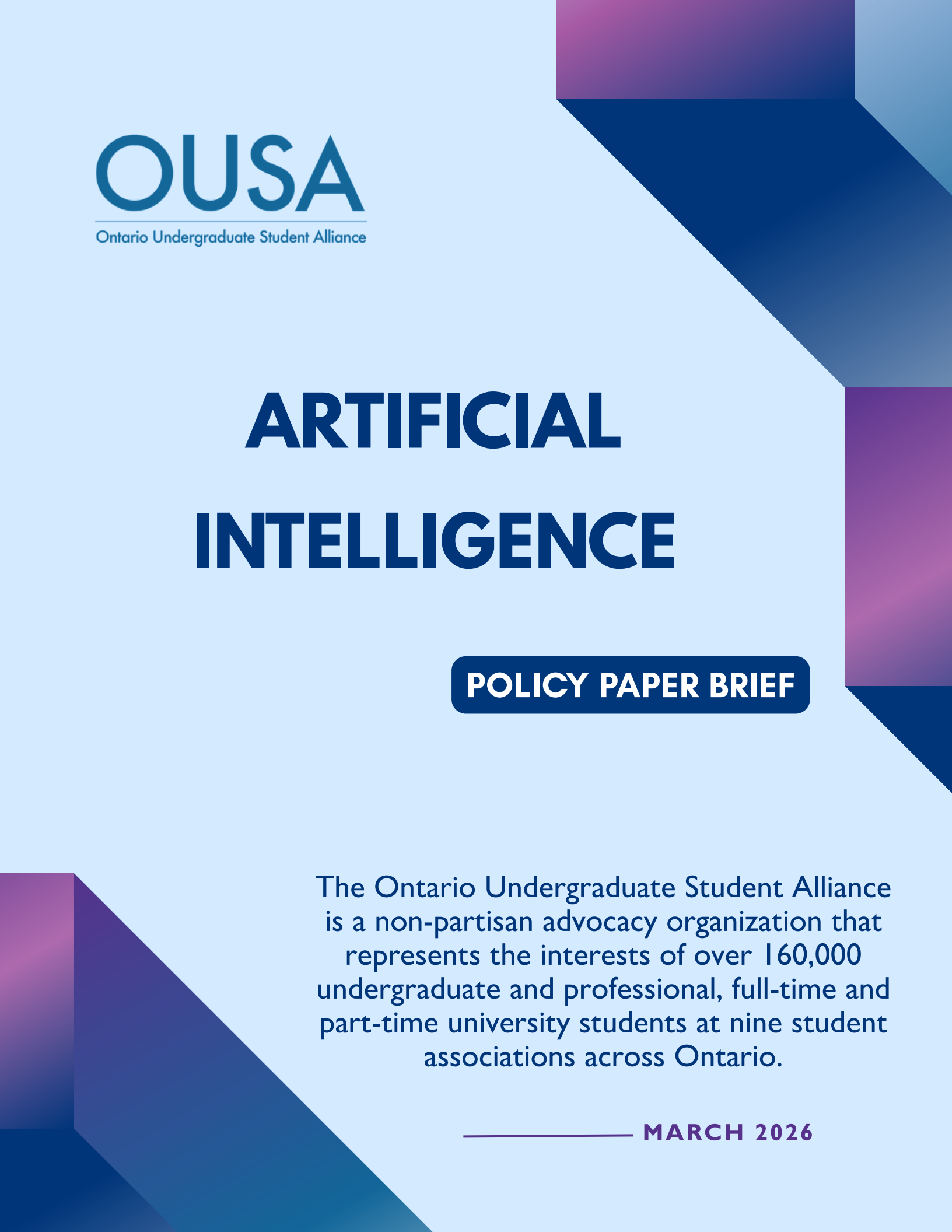




OUSA

Ontario Undergraduate Student Alliance

ARTIFICIAL INTELLIGENCE

POLICY PAPER BRIEF

The Ontario Undergraduate Student Alliance is a non-partisan advocacy organization that represents the interests of over 160,000 undergraduate and professional, full-time and part-time university students at nine student associations across Ontario.

MARCH 2026

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SUMMARY

The *Artificial Intelligence* policy paper was developed by undergraduate students through the Ontario Undergraduate Student Alliance to identify student concerns and propose student-driven recommendations for Ontario's post-secondary sector. Artificial Intelligence (AI), particularly generative artificial intelligence, is increasingly shaping how students learn, complete coursework, access supports, and engage with academic institutions.

The paper focuses on the systems, policies, institutional practices, and provincial frameworks needed to guide the use of AI in Ontario's post-secondary sector. While AI can support student learning, accessibility, research, and digital skill development, students are also concerned about academic integrity, privacy, affordability, accessibility, institutional oversight, environmental impacts, and algorithmic bias.

The following principles, concerns, and recommendations were crafted by undergraduate students to advance an accountable, accessible, affordable, equitable, and high-quality approach to artificial intelligence in post-secondary education.

INADEQUATE AI REGULATION, OVERSIGHT, AND INSTITUTIONAL SUPPORT

I. AI Use, Regulation, & Oversight

Concerns:

Students are concerned that reliance on AI-detection tools in academic integrity cases can generate false positives, escalating matters into formal disputes and risking unfair outcomes for students. Further, not all post-secondary institutions have a standalone policy that outlines AI usage, creating uncertainty for students. Generic AI guidelines do not factor in the unique ways that AI can be used throughout different academic disciplines. Rapid adoption of AI systems in post-secondary risks substituting instructor-led teaching and staff-delivered supports, potentially undermining educational quality and student learning experiences. The use of AI in admissions screening may replicate existing biases and reduce transparency in decision-making, disadvantaging applicants from underrepresented or non-traditional backgrounds.

Lastly, information regarding the collection, utilization, and disclosure of personal information to AI systems are currently not readily accessible to students.

Recommendations:

The **provincial government** should:

- amend the Ministry of Training, Colleges and Universities Act to require every post-secondary institution to maintain a standalone AI policy, developed in consultation with staff, faculty, students, and membership from their representative associations, that clearly sets out permissible use, prohibited use, and enforcement processes for all respective parties.
- develop a Post-Secondary Education Subcommittee within the AI Expert Working Group consisting of staff, faculty, students, and membership from their representative associations.

Recommendations Continued:

- provide post-secondary institutions with funding to establish interdisciplinary working groups composed of staff, faculty, students, and membership from their representative associations to inform the development of AI frameworks, best practices, and policies that are discipline-specific.
- establish guidelines regulating the use of AI in post-secondary admission processes, including requirements for transparency and human oversight in admission decisions.
- require all post-secondary institutions to make Privacy Impact Assessments publicly available and accessible, including for AI software and systems used by institutions.

The **Ministry of Colleges, Universities, Research Excellence and Security (MCURES)** should:

- fund privacy-preserving assessment design that reduces or discourages inappropriate AI use in line with Universal Design for Learning principles.

- prohibit the use of AI detection systems in academic integrity investigations across post-secondary institutions, given their high risk of false accusations.
- mandate standardized disclosure of AI usage, as required by FIPPA, in a manner easily accessible to students prior to course enrolment.
- require post-secondary institutions to implement mandatory training for faculty and staff on permissible AI use in teaching, learning, assessment, and research.
- mandate that all post-secondary institutions have a clear and timely process for students to request human reviews of AI grading processes and decisions.
- require institutions to adopt AI use guidelines that ensure AI systems enhance, but do not replace, instructor-led teaching, course material development, and human-delivered student supports.

2. Institutional Supports and Research on AI

Concerns:

Students have identified concerns that instructors and faculty may lack adequate institutional training on how to address the ethical concerns associated with AI and how to effectively use AI in course design and teaching. Post-secondary institutions also lack adequate funding to conduct research on AI's impact on student well-being, educational quality, academic integrity, equity, and accuracy. Inconsistent AI education across institutions can create uneven AI literacy and graduate preparedness, widening employability gaps depending on where students study.

Post-secondary institutions in Ontario may also lack the designated staff, organizational structures, and governance capacity needed to support the utilization, adaptation, integrity, privacy, and security of AI software used on campus. Students are also concerned about the lack of information regarding the environmental impact of post-secondary education institutions' AI usage.

Recommendations:

The **provincial government** should:

- provide institutions with funding for professional development programs aimed at training faculty and staff on AI literacy, including its accessible, equitable, and ethical integration.
- provide funding to institutions for the creation of AI literacy courses aimed at equipping students with the necessary tools and education to navigate AI correctness, hallucinations, inherent biases, privacy concerns, ethical use, and benefits to learning.
- implement innovation incentives at post-secondary institutions focused on the possibilities of AI and economic development.
- provide funding for publicly available research on AI, with specific focus on how AI impacts student well-being, educational quality, academic integrity, equity, and accuracy in post-secondary institutions.

Recommendations Continued:

- provide grant funding for research at each university on student competencies and relationships with AI to inform AI integration into post-secondary education and better understand current levels of student AI literacy.

The provincial government should task **HEQCO** with:

- producing best practices for institutions and policy recommendations for the provincial government based on research regarding AI's impact on student well-being, educational quality, academic integrity, equity, accuracy, and student mental health in post-secondary institutions.

The provincial government should task the **AI Expert Working Group** with:

- examining AI-related energy demand and environmental impacts, while developing regulatory and innovation-oriented strategies to support the sustainable adoption of AI within post-secondary institutions.

MCURES should:

- provide funding to support baseline AI governance capacity at every institution, scaled by enrolment.

GAPS IN PROVINCIAL LEGISLATION

Concerns:

Students have highlighted that Ontario's existing AI legislation and frameworks apply broadly to public institutions and do not specifically address AI use in post-secondary institutions.

Recommendations:

The **provincial government** should:

- legislate clear and specific statutory guardrails around AI use and compliance in post-secondary institutions.

MCURES should:

- require post-secondary institutions to establish formal procedures for ongoing student consultation in the development and review of institutional AI policies within the appropriate institutional academic governance body, based on the implementation of the Post-Secondary Education Subcommittee.

INEQUITABLE ACCESS AND AFFORDABILITY OF AI

Concerns:

Students are concerned that post-secondary institutions may lack the financial resources and hardware capability to provide open, equitable access to AI software and technologies used or required in courses. Marginalized students may not have access to the financial resources, reliable internet, or hardware necessary to afford or access paid or premium AI systems, which may perpetuate systemic inequities in post-secondary education. Lastly, the current Responsible Use of Artificial Intelligence Directive does not fully account for ensuring and enhancing accessibility for people with disabilities regarding AI use.

Recommendations:

MCURES should:

- provide additional funding and expand eligible costs under the Training, Equipment, and Renewal Fund to provide post-secondary institutions with the adequate equipment needed to run AI software that is necessary or used in courses offered by the institution.

- expand the OSAP equipment allowance to include required AI software subscriptions, platform fees, and necessary hardware upgrades where program delivery may require AI systems.
- mandate that when AI software or platforms with AI integrations are course-required, licensing costs must be assumed by the institution.

The provincial government should task the **AI Expert Working Group** with:

- creating a framework that includes measures for accessibility systems for AI software use.

The provincial government should task **HEQCO** with:

- researching how AI creates barriers to access for students with disabilities to inform legislative changes.

INSUFFICIENT OVERSIGHT OF AI DATA USE AND STORAGE

Concerns:

Students have identified concerns that the provincial government does not conduct enough research on AI use, systems impact, access, ethics, and integrity within post-secondary institutions, courses, and student experiences. Post-secondary institutions also lack adequate resources to conduct consistent and in-depth campus-level research that meaningfully engages students, staff, and faculty. Without stronger institutional and provincial data collection, policy responses may not adequately address the benefits, risks, barriers, and impacts of AI across Ontario campuses.

Students are also concerned that AI systems may be trained on datasets containing embedded historical and structural biases, or datasets that lack representativeness, which can disproportionately harm marginalized communities. AI systems can also be misused for harmful activities and raise data privacy risks due to unclear data storage and access practices. Further, students' original work, including essays, code, creative work, and assignments,

may be collected and used to train future AI models without meaningful consent, resulting in future derivative works and potential academic integrity risks.

Recommendations:

MCURES should:

- develop and administer a survey to students, staff, and faculty, in collaboration with post-secondary institutions, on AI use, systems impact, access, ethics, and integrity, and publicly publish aggregated and institution-specific results.

The provincial government should task the **AI Expert Working Group** with:

- developing best practices on data sourcing and procurement of AI systems for post-secondary institutions relating to collection, administration, and usage.

The **provincial government** should:

- mandate that post-secondary institutions may only procure AI systems that provide standardized disclosures detailing training data composition, known biases, and documented limitations in accessible language for users.

The image features a light blue background with decorative geometric shapes in the corners. These shapes are composed of overlapping squares and triangles in shades of purple, magenta, and dark blue. The shapes are positioned in the top-right and bottom-left corners, creating a modern, abstract design.

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