



POLICY PAPER

Artificial Intelligence

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ABOUT OUSA

OUSA represents the interests of 160,000 professional and undergraduate, full-time and part-time university students at eight student associations across Ontario. Our vision is for an accessible, affordable, accountable, high-quality, and equitable post-secondary education in Ontario. To achieve this vision we've come together to develop solutions to challenges facing higher education, build broad consensus for our policy options, and lobby the government to implement them.

The member institutions and home office of the Ontario Undergraduate Student Alliance operate on the ancestral and traditional territories of the Attawandaron (Neutral), Haudenosaunee, Huron-Wendat, Leni-Lunaape, Anishinaabek, and Mississauga Peoples.

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OUSA policy papers are written by students to articulate student concerns and offer student-driven solutions for accessible, affordable, accountable, high quality, and equitable post-secondary education in the province.

To support our policies and ensure that we are effectively representing undergraduate and professional students at Ontario's universities, students and student groups from each of our eight member institutions were consulted to provide guidance and feedback on the principles, concerns, and recommendations contained herein.

OUSA would like to thank students and student groups from Brock University, Laurentian University, McMaster University, Ontario Tech University, Queen's University, Trent University, Durham GTA, the University of Waterloo, Western University, and Wilfrid Laurier University for their valuable contributions to this policy paper.

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GLOSSARY

Artificial Intelligence (AI) Systems: AI System, is the use of an Artificial Intelligence system by a public sector entity that is publicly available or developed by a third party on the behalf of the public sector entity.

Algorithms: Sets of instructions in computing used to take an input and produce an output wherein AI algorithms learn patterns from datasets tailored by their authors. Any one AI system may use several algorithms at once in completion of tasks. Algorithms themselves for example may include architecture, training, output, or system level depending on the level which is referenced.¹

Artificial Intelligence: Refers to computational systems that analyze data, generate content, or support decision-making processes, including technologies such as predictive analytics, automated evaluation systems, and generative AI tools used in academic and administrative settings.

Bill 194 (Strengthening Cyber Security and Building Trust in the Public Sector Act, 2024): Provincial legislation that amended the Freedom of Information and Protection of Privacy Act (FIPPA) and introduced privacy and AI governance requirements for Ontario public institutions including publicly funded post-secondary institutions. Key provisions include mandatory Privacy Impact Assessments (PIAs) before deploying new AI tools, requirements to publish notices when AI is used in decisions affecting individuals, mandatory breach reporting obligations where there is a risk of significant harm. The 2025/2026 amendments also specify that publicly funded universities and colleges fall within scope as institutions under the Act.

Chatbot: A software or application designed wherein a user actively converses with a generative AI to respond to user queries. This is the most common use of AI tools with intellectual property from Anthropic, OpenAI, Microsoft Copilot, etc.

Data sourcing: The selection and processing of data sources during the computing of AI commands.

Generative Artificial Intelligence (GenAI): Systems that, in response to user prompts, are able to generate new responses and outputs based on how they were trained. This can include written and visual results, like images. This differs from other forms of AI wherein outputs are predictive in nature based on the datasets they were trained on.²

¹ “Glossary of AI-Related Terms.” Glossary of AI-Related Terms - Learning Network - Western University. Accessed September 25, 2026. <https://www.gbvllearningnetwork.ca/knowledge-exchanges/ke15/glossary.html>

² Adam Zewe, “Explained: Generative AI,” *Massachusetts Institute of Technology*, November 9, 2023, <https://news.mit.edu/2023/explained-generative-ai-1109>

Generative Pre-trained transformers (GPTs): Chatbots that actively imitate human responses which heavily relies on inferences. The nature of being pre-trained provides massive amounts of data to predict language patterns based on massive datasets. Open source models may have several parameters which attenuate the model to a set of parameters to optimize their accuracy, some models may have upwards of 7 to 70 billion.³

Hallucinations: Any response given by an Large Language Models (LLM) wherein incorrect information is factually provided in response to a user prompt wherein the information is nonfactual, poorly supported, or illogical. Responses that are hallucinations may also be unintentionally incorrect due to outdated or poor quality data being presented as factual.⁴

Large Language Models (LLMs): A subtype generative AI System that performs natural language tasks, through user prompts by creating synthetic responses in response to user input. Due to the nature of their creation wherein datasets used for training can give false information known as hallucinations.⁵

³The University of British Columbia. "Glossary of GenAI Terms." A.I. in Teaching and Learning. Accessed September 25, 2026. <https://ai.ctlt.ubc.ca/resources/glossary-of-genai-terms/>

⁴"Glossary of AI-Related Terms." Glossary of AI-Related Terms - Learning Network - Western University. Accessed September 25, 2026. <https://www.gbylearningnetwork.ca/knowledge-exchanges/ke15/glossary.html>

⁵Sandhu, Jamie A. "What Are LLMs and Generative Ai? A Beginner's Guide to the Technology Turning Heads." Schwartz Reisman Institute, August 19, 2026. <https://srinstitute.utoronto.ca/news/gen-ai-llms-explainer>

EXECUTIVE 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.

Find a full summary of this paper's concerns and recommendations in the [Policy Brief](#).

INTRODUCTION

Over the past several years, Artificial Intelligence (AI) has moved from being an emerging piece of technology to a permanent presence across nearly all sectors, including post-secondary education. While the rapid rise of AI in the classroom may feel recent, it is by no means a new phenomenon. Its development has been around for several years and has gone through several phases of improvements to its capabilities.⁶ AI has been quickly integrated into many of the service interfaces that society-at-large directly interacts with such as Google, Apple, and Microsoft, making it a regular part of everyday life. This puts AI at the forefront of everything we do and post-secondary education is no different.

AI, specifically Generative AI (GenAI) has presented both an opportunity and challenge for the post-secondary sector. For the purposes of this paper, AI will specifically be in reference to GenAI. As this technology continues to evolve and advance with its capabilities, institutions must be prepared to adapt to the ways that staff and students intend to use it. Institutions face ongoing challenges. Many post-secondary institutions lack standalone AI policies, leaving students and faculty uncertain about expectations and enforcement. Provincial legislation, including recent amendments to existing policies has yet to establish guardrails specific to the post-secondary sector. Access to AI tools remains inequitable across institutions, and questions persist around how student data is collected, stored, and used to train AI systems. These are some of the challenges discussed in this paper.

GenAI can be useful study tools for students in order to enhance their understanding of course contents. Therefore, institutions should not shy away from establishing clear policies that balance students' ability to reap the educational benefits of GenAI with limitations on its scope of use, particularly in cases where certain skills development, like critical thinking, cannot be fostered through GenAI.⁷ The inherent biases of AI must also be addressed in order to avoid the harm and miscalculations that can negatively impact student learning.⁸ OUSA believes that the province has a role to play in this by providing and improving resources for institutions informed by experts and pre-existing legislation.

This paper presents a series of evidence-based recommendations, directed at the provincial government and sector stakeholders, that reflect the values and priorities of Ontario's undergraduate students. By offering more structured regulations around GenAI in post-secondary, we hope that the province, institutions, faculty, and students are able to

⁶ Tim Mucci, "The History of Artificial Intelligence," *IBM*, October 21, 2024, <https://www.ibm.com/think/topics/history-of-artificial-intelligence>

⁷ Gerlich, Michael. "AI Tools in Society: Impacts on Cognitive Offloading and the Future of Critical Thinking." *Societies* 15, no. 1 (January 3, 2025): 6. <https://doi.org/10.3390/soc15010006>

⁸ Kundi, Bushra, Christo El Morr, Rachel Gorman, and Ena Dua. "Artificial intelligence and bias: a scoping review." *AI and Society* (2023): 199-215.

effectively engage with the technology intentionally. There is no way to completely prevent students' use of GenAI in education and as such, productive conversations to embrace its benefits on learning outcomes while restricting its influence on actual academic outputs will be conducive to keep up with this ever-evolving technology. OUSA looks forward to working with the provincial government to bring forth these recommendations, to eventually create a more consistent and well-regulated approach to AI across Ontario's post-secondary environment.

AI IN LEARNING AND RESEARCH

AI USE, REGULATION, & OVERSIGHT

Principle: Students should be informed of permissible use and regulation of AI in courses prior to enrollment.

Principle: AI should complement instructor-led teaching and support student learning without replacing core instructional or academic supports to protect educational quality and student learning outcomes.

Principle: Academic integrity accusations made towards students regarding AI usage should be based on reliable and trustworthy evidence.

Principle: Post-secondary admissions processes should be transparent about how AI is used ensuring that institutions are held accountable in the fair evaluation of all applicants.

Principle: Students should have access to information regarding the collection, utilization, and disclosure of personal information to AI tools approved for use at their post-secondary institutions.

Principle: Students should work alongside staff, faculty and membership from their representative associations to develop an AI framework that represents the student perspective.

Concern: Reliance on AI-detection tools in academic integrity cases can generate false positives, escalating matters into formal disputes and risking unfair outcomes for students.

Concern: Not all post-secondary institutions have a standalone policy that outlines AI usage, creating uncertainty for students.

Concern: Generic AI guidelines do not factor the unique ways that AI can be used throughout different academic disciplines.

Concern: 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.

Concern: 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.

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

Recommendation: 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 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.

Recommendation: The provincial government should develop a Post-Secondary Education Subcommittee within the AI Expert Working Group consisting of staff, faculty, student, and membership from their representative associations.

Recommendation: The provincial government should provide post-secondary institutions with funding to establish an interdisciplinary working group composed of staff, faculty, students and membership from their representative associations to inform the development of AI framework(s), best practice(s), and/or policy(ies) that are discipline-specific.

Recommendation: 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 the Universal Design for Learning (UDL) principles.

Recommendation: MCURES should prohibit the use of AI detection systems in academic integrity investigations across post-secondary institutions, given their high risk of false accusation.

Recommendation: MCURES should mandate a standardized disclosure of AI usage, as required by FIPPA, in a manner easily accessible to students prior to course enrollment. .

Recommendation: MCURES should require post-secondary institutions to implement mandatory training for faculty and staff on permissible use of AI for use in teaching, learning, assessment, and research.

Recommendation: MCURES should mandate that all post-secondary institutions have a clear and timely way for students to request human reviews of AI grading processes and decisions.

Recommendation: MCURES should require institutions to adopt AI use guidelines that ensure AI systems enhance, but not replace instructor-led teaching, course material development, and human-delivered student supports.

Recommendation: The provincial government should establish guidelines regulating the use of AI in post-secondary admission processes including requirements for transparency, and human oversight in admission decisions.

Recommendation: The provincial government should require all post-secondary institutions make all Privacy Impact Assessments (PIA) publicly available and accessible, including for AI software and systems utilized.

In recent years, the use of AI has been on the rise in post-secondary education. Students, staff, and faculty are learning how to navigate the use of this tool within the confines of traditional learning. A technological advancement of this caliber requires careful consideration into studying habits, assessment design, grading, and teaching. Most importantly, the integration of AI

into post-secondary education requires an overall approach that upholds the accessibility, affordability, accountability, quality, and equity of learning.

AI should be a permissible tool for students and faculty to use in the classroom. However, this must be in accordance with institutional policy and guidelines that are both structured and well-informed. AI is already being utilized by students to assist their learning in the classroom. OUSA's 2024 Ontario Undergraduate Student Survey (OUSS) reveals that 62 percent of students have used a version of AI tools within their learning.⁹ Specifically, 57 percent of students have used AI for brainstorming, 52 percent to understand course material, and 51 percent for feedback on writing.¹⁰ Despite some concerns of AI in education, it can be a beneficial tool for students if utilized correctly to safeguard critical-thinking skills.

Noting the uptake in student usage of AI, students should be well informed of their post-secondary institution's stance on permissible use and regulation of AI. However, not all post-secondary institutions currently have a standalone policy that outlines AI usage. In fact, approximately 30 percent of publicly funded institutions in Ontario have outlined AI usage through set guidelines or policies.¹¹ The Higher Education Strategy Associates have compiled a list of domestic and international post-secondary institutions that have created or updated policies to incorporate AI.¹² Among OUSA's member schools, 19 percent of students reported that their institution has a policy to permit AI usage and 59.4 percent reported that their institution has a policy to restrict AI usage.¹³

Without clear policy and guidelines around AI, this creates uncertainty for students regarding AI usage and enforcement. It creates confusion on how students can use AI in their learning as well as what the restrictions are when it comes to academic integrity. This uncertainty creates a vagueness around enforcement and students should not consequently face unjust academic integrity accusations regarding AI usage. A reliance on AI-detection tools in academic integrity cases can generate false positives, escalating matters into formal disputes and risking unfair outcomes for students. With such a high risk of false accusations, OUSA believes that MCURES should prohibit the use of AI detection tools in academic integrity investigations across post-secondary institutions. Instead of having AI detection tools, MCURES should fund privacy-preserving assessment redesign that reduces reliance on surveillance and prevents inappropriate AI use by design, including staged submissions, process-based evaluation, and oral verification where appropriate. These assessment approaches should be developed in line with

⁹ Unpublished data from OUSA's 2024 Ontario Undergraduate Student Survey.

¹⁰ Ryan Tishcoff, Elizabeth Agoe, Miha Isik, and Alexandra MacFarlane, *Using Generative AI to Make Learning More Accessible: Insights from Ontario PSE Students and Staff* (Higher Education Quality Council of Ontario: Toronto, ON), 2024, <https://heqco.ca/wp-content/uploads/2024/11/GenAI-Report-FORMATTED-EN.pdf>

¹¹ Ibid.

¹² Ibid; Higher Education Strategy Associates, "Policies & Guidelines," AI Observatory, *Higher Education Strategy Associates*, n.d., <https://higheredstrategy.com/ai-observatory-home/ai-observatory-policies-and-guidelines/>

¹³ Unpublished data from OUSA's 2024 Ontario Undergraduate Student Survey.

Universal Design for Learning principles so that academic integrity protections do not create unnecessary barriers for students with diverse learning needs.

Beyond academic fairness issues, it is also important that AI development does not replace instructor led teaching and staff-delivered support. While AI may support administrative efficiency or provide supplemental learning assistance, it should not be used as a substitute for instructors, teaching assistants, academic advisors, accessibility staff, or other human supports that are central to educational quality. As such, MCURES should adopt AI use guidelines that ensure AI systems enhance, but not replace instructor-led teaching, course material development, and human-delivered student supports.

The integration of AI into grading and assessment is a particularly consequential area that needs more attention. Institutions across Ontario are increasingly adopting AI-assisted tools within their learning management systems, sometimes without students being made aware of how these tools function or what data they generate. OUSA believes that students must have a clear and timely mechanism to request human review to assessment wherever AI plays a role in the grading decisions. MCURES should mandate that all post-secondary institutions provide students with a transparent and accessible process for requesting human review of any AI-assisted grading process. To support these safeguards, MCURES should also require mandatory training for faculty and staff on permissible use of AI in teaching, learning, assessment, and research, ensuring those using AI tools understand both their capabilities and limits.

Furthermore, to address the uncertainties around AI usage and enforcement with post-secondary institutions, the provincial government should amend the *Ministry of Training, Colleges and Universities Act* to require all post-secondary institutions to have an AI policy outlining permissible use and regulation surrounding AI, developed in consultation with staff, faculty, students, and membership from their representative associations, and communicated clearly in course syllabi prior to student enrollment, including for instructor evaluations purposes. Within the Artificial Intelligence Expert Working Group, the provincial government should develop a Post-Secondary Education Subcommittee consisting of representation from staff, faculty, students, and membership from their representative associations. Currently, “the AI Expert Working Group provides the Ontario government with advice and recommendations on the development of Ontario’s Trustworthy AI Framework and responsible use of AI within the public sector.”¹⁴ The unique nature of post-secondary education is not recognized through a generalization of the public sector, which presents a gap that must be filled. The recommendations from the Post-Secondary Education Subcommittee would assist post-secondary institutions with developing their own standalone policy to ensure a level of

¹⁴ Government of Ontario, “Ontario’s Trustworthy Artificial Intelligence (AI) Framework,” *Government of Ontario*, last updated March 14, 2025, <https://www.ontario.ca/page/ontarios-trustworthy-artificial-intelligence-ai-framework>

standardization across post-secondary institutions in Ontario. In addition to providing support to post-secondary institutions with policy development, the province should also provide funding for schools to establish an interdisciplinary working group composed of students, staff and faculty to inform the development of AI framework(s), best practice(s), and/or policy(ies) that are discipline-specific.

Students also should have a right to know how their personal information is collected, used and disclosed when AI tools are being used in learning environments. Currently, there is no consistent standard across institutions on how this information is communicated. To avoid this, MCURES should mandate a standardized disclosure of AI usage as required under FIPPA in a manner that is easily accessible to students prior to course enrollment. On top of that, all Privacy Impact Assessments should be made publicly accessible, including information on AI software used at the institution. This would allow students to make informed decisions and support institutional accountability.

The use of AI in post-secondary admission processes is another separate concern. As institutions adopt AI in the evaluation process, there is a risk that these systems would have biases embedded in their training data reducing transparency and disadvantaging applicants from underrepresented or non-traditional backgrounds. To avoid this, the provincial government should establish guidelines regulating the use of AI in post-secondary admissions processes, including requirements for transparency about when and how AI is used, mandatory disclosure of the bias of AI training data that influences outcome, and most importantly, human oversight in final admissions decisions.

Overall, a move towards AI in post-secondary education must follow with a clear approach to AI use, regulation and oversight to ensure the promotion of evolving digital tools, while also safeguarding the integrity of student's learning.

INSTITUTIONAL SUPPORTS AND RESEARCH ON AI

Principle: Institutions should have sufficient AI governance capacity to oversee AI use, integrity, privacy, and security across learning, teaching, assessment, and research.

Principle: Institutions should adequately support faculty and staff in enhancing their knowledge to conduct research and be consulted on AI use or advancements.

Principle: Institutions should adequately research and support students in enhancing their knowledge on the academic use, regulation, and impacts of AI.

Principle: Advancing sustainable AI technology can help reduce the environmental impact of increased AI use within post-secondary institutions.

Concern: Instructors and faculty lack adequate training from their institutions on how to address the ethical concerns associated with AI and how to effectively use AI in course design

and teaching.

Concern: Post-secondary institutions lack adequate funding for conducting research into AI, with regards to AI impacts on student well-being, education quality, integrity, equity, and accuracy in post-secondary institutions.

Concern: Inconsistent AI education across post-secondary institutions creates inconsistent AI literacy and graduate preparedness, widening employability gaps depending on where students study.

Concern: Post-secondary institutions in Ontario often lack the designated staff, proper organizational structure, and governance capacity to support the utilization, adaptation, integrity, and security of the AI softwares used within post-secondary institutions.

Concern: Students are concerned about the lack of information regarding the environmental impact of post-secondary education institutions' AI usage.

Recommendation: 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.

Recommendation: The provincial government should 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, hallucination, inherent biases, privacy concerns, ethical use, and its benefits to learning.

Recommendation: The provincial government should implement innovation incentives at post-secondary institutions focused on the possibilities of AI and economic development.

Recommendation: The provincial government should provide funding for publicly-available research on AI, with specific focus on how AI impacts student well-being, education quality, integrity, equity, and accuracy in post-secondary institutions.

Recommendation: The provincial government should task Higher Education Quality Council of Ontario (HEQCO) to produce best practices for institutions and policy recommendations for the provincial government based on research conducted regarding AI's impact on student well-being, educational quality, integrity, equity, accuracy, and student's mental health in post-secondary institutions.

Recommendation: MCURES should provide funding to support baseline AI governance capacity at every institution, scaled by enrollment.

Recommendation: The provincial government should task the AI Expert Working Group to examine 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.

Recommendation: The provincial government should provide grant funding for research in

each university on student competencies and relationships with AI's consequent factors to inform AI's integration into post-secondary education, current levels of AI literacy in students.

One of the key challenges for the utilization and adaptation of AI in a secure and integrable way is the support towards channels within post-secondary institutions. This includes how all post-secondary institutions should have dedicated staffing and/or department(s) to look over AI's use, adaptation, integrity, quality, and security within their institution. Oftentimes, many post-secondary institutions lack the necessary designated resources to properly support the complex movements and developments of AI with regards to its impacts on faculty, students, and educational outcomes.¹⁵ This harms the abilities and capacities of institutions, given the lack of clear legislation and scope of provincial AI regulations,¹⁶ to permit siloed pursuits and adopt a variety of policy and organizational models to shape the use and adaptation of AI. For this, MCURES should task and provide funding for the HEQCO to research and develop guidelines for post-secondary institutions on developing and implementing position(s) and/or departments that can be dedicated to and be responsible for the oversight of AI at post-secondary institutions. To ensure financial support for this capacity, MCURES should provide funding to support baseline AI governance capacity at every institution, scaled by enrollment. Lastly, current unspecific policies, government directed mandates, and a lack of best practices poses risks for post-secondary institutions to make mistakes for using and adapting to AI.¹⁷ To help address this and assist department specific efforts towards AI management and oversight, the provincial government should task HEQCO to produce best practices for institutions and policy recommendations for the provincial government based on research about AI's impact on student well-being, educational quality, integrity, equity, and accuracy in post-secondary institutions.

Having proper organizational structure, funding, support, and governance within post-secondary institutions still leaves a need for proper support for those interacting with it the most at the post-secondary level - students and faculty. Institutions should adequately support staff and faculty through enhancing their knowledge, conducting research, and be consulted on AI use or advancements within post-secondary institutions. When institutions utilize professional development, reference materials, and foster an understanding across the faculty level, this can significantly improve the outcomes for students with its use of AI, reduce academic misconducts, and ensure assignment quality is designed to go beyond a reliance on AI.¹⁸

¹⁵ Tishcoff et al., *Using Generative AI to Make Learning More Accessible*

¹⁶ Patricia Kosseim, "IPC Comments on the Ontario Government's Consultation on Ontario's Trustworthy Artificial Intelligence (AI) Framework," *Information and Privacy Commissioner of Ontario*, June 2021, <https://www.ipc.on.ca/sites/default/files/legacy/2021/06/2021-06-04-ipc-comments-on-ai-framework.pdf>

¹⁷ Tishcoff et al., *Using Generative AI to Make Learning More Accessible*

¹⁸ Ibid.

Further, it is best to prepare faculty for AI compatibility and knowledge with current patterns of how students use AI and allow for a moderated, equitable, and secure transition that does not leave any faculty or students behind.¹⁹ Notably, instructors and faculty lack adequate training from their institutions on how to address the ethical concerns associated with AI or how to effectively use AI in course design and teaching, relating to aforementioned concerns that post-secondary institutions lack adequate funding for conducting research into AI. For this, the provincial government should provide institutions with funding for professional development programs focused on AI literacy, including its integration into course creation and its accessible, equitable, and ethical integration. The province should also provide funding through special purpose grants for research into AI, with specific focus on AI's impact on student well-being, education quality, integrity, equity, and accuracy in post-secondary institutions, with findings made publicly available. Ultimately, this will empower instructors and address existing knowledge gaps.

Generic AI guidelines do not factor the unique ways that AI can be used throughout different academic disciplines. Not only does this significantly impact students' academic outcomes, records, and experiences in post-secondary, it also paints an inaccurate reflection of AI's impact on the outcomes of assignments and testing given the assumptions of AI testing softwares and institutions' inability to properly assess the suspected AI use violations.²⁰ Like with faculty, to help with students' knowledge and awareness of AI, the provincial government should provide funding for the creation of literacy programs aimed at equipping students with the tools necessary to navigate AI correctness, hallucination, inherent biases, privacy concerns, ethical use, and its benefits to learning. To support this, the provincial government should provide grant funding for research at each university on student competencies and their relationships with AI's consequent factors, in order to inform AI's integration into post-secondary education and assess current levels of AI literacy among students.

Beyond literacy and research, post-secondary institutions are well-positioned to serve as sites of AI innovations that connect academic knowledge with economic development. The provincial government should implement innovation incentives at post-secondary institutions to explore the possibilities of AI and its contribution to economic development. These incentives can support applied research, industry partnerships, and responsible AI innovation, while ensuring that the benefits of that innovation are grounded in the educational mission of institutions.

¹⁹ Ibid.

²⁰ Alex Nguyen et al., *Digital Transformation: Integrating Artificial Intelligence (AI) in Canadian Post-Secondary Education* (Ottawa, ON: Canadian Alliance of Student Associations), February 7, 2025, https://assets.nationbuilder.com/casaacae/pages/3981/attachments/original/1738953770/Digital_Transformation_Integrating_Artificial_Intelligence_in_Canadian_Post-Secondary_Education.pdf?1738953770; eCampusOntario, "eCampusOntario launches AI-enabled Micro-Credential Portal tool to Help Learners Address Skills Gaps," eCampusOntario, 2024, <https://ecampusontario.ca/ecampusontario-launches-ai-enabled-micro-credential-portal-tool-to-help-learners-address-skills-gaps/>

Lastly, there needs to be broader institutional support towards mitigating the harmful implications of AI use on the environment that rise from AI use within institutions and its students. This is important as for students, there is currently a lack of appropriate education and access to information on institutional AI usage to appropriately assess institutional environmental impact. OUSA would recommend that the provincial government task the Ontario Government's AI Expert Working Group to examine the post-secondary sector's role in 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.

RESPONDING TO PROVINCIAL LEGISLATION

Principle: Provincial legislation and regulations should aim to ensure that AI technologies are implemented in beneficial ways that maintain professional and academic integrity, while safeguarding privacy and personal information.

Principle: Post-secondary students should have input into the development and implementation of provincial legislation and regulations around AI use, particularly within post-secondary learning.

Principle: AI use should have a clear and defined framework required across all institutions to ensure that use within post-secondary institutions is transparent, trustworthy, and serves everyone.

Concern: Ontario's existing AI legislations and frameworks apply broadly to public institutions and do not specifically address AI use at post-secondary institutions.

Recommendation: The provincial government should legislate clear and specific statutory guardrails around AI use and compliance in post-secondary institutions.

Recommendation: Based on the implementation of the Post-Secondary Education Subcommittee, 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.

Provincial legislation and regulations should be made to protect consumers of AI from risks or negative impacts, with safeguards for private and personal information. At the same time, they should ensure every individual benefits from the advantages of AI and is accountable to the responsible use of it. This includes students, which, as previously mentioned based on OUSA's biennial survey, almost two-thirds have used AI in their learning.²¹ The need for specific and clear standards and guidelines is recognized by the Ontario Information and Privacy Commissioner, highlighting that Bill 194 has the opportunity to have clear statutory guardrails for public sector use that includes post-secondary institutions. While the 2025-2026 amendments introduced through Bill 194 are a step forward, actions including introducing mandatory Privacy Impact Assessments, AI transparency notices, and breach reporting obligations still do not go far enough in specifically addressing AI use within the post-secondary context. The amendments apply broadly to public institutions without establishing the PSE-specific rules, definitions, and accountability structures that are necessary for the unique academic environment students navigate. The provincial government should therefore legislate clear and specific statutory guardrails around AI use and compliance that are explicitly designed for post-secondary institutions rather than leaving PSE applicability to broad interpretation.

²¹ Unpublished data from OUSA's 2024 Ontario Undergraduate Student Survey.

Additionally, Bill 194 raises concerns since it does not allow for the potential allocation or eligibility of funding for public entities which would support their compliance with the Bill and reduce disparities in compliance and standards.²² To make sure universal funding is available for adoption of legislative and regulatory requirements established, The Ministry of Public and Business Service Delivery and Procurement should allocate funding to assist public entities in the financial resources needed for the implementation of Bill 194. The absence of PSE-specific guardrails means that post-secondary institutions currently lack a standardized and clearly defined framework to ensure that AI used within their environment is transparent, trustworthy, and serves all students equitably.

Post-secondary students should also have meaningful input into the development and implementation of provincial legislation and regulations surrounding AI use, particularly within their learning environments.

Provincial frameworks, legislation, and other guiding documents developed or commissioned by the government around AI lack post-secondary student involvement, as indicated by the composition of the Artificial Intelligence Expert Working Group.²³ This can create unidentified impacts on students that go unnoticed and end up negatively affecting their AI use.²⁴ At the institutional level, this gap is equally present, with students not formally consulted when institutions develop or revise their own AI policies, despite being the primary users of AI tools in coursework, assessments and research. Based on the implementation of the Post-Secondary Education Subcommittee, 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. By doing so, this ensures that policies set reflect the realities of how students encounter and use AI in their learning.

²² Kosseim, “IPC Comments on the Ontario Government’s Consultation on Ontario’s Trustworthy Artificial Intelligence (AI) Framework,”

²³ Government of Ontario, “Ontario’s Trustworthy Artificial Intelligence (AI) Framework,”

²⁴ Kosseim, “IPC Comments on the Ontario Government’s Consultation on Ontario’s Trustworthy Artificial Intelligence (AI) Framework,”

ACCESS TO AND AFFORDABILITY OF AI

Principle: Students should have equitable access when utilizing or accessing course-required AI software and technologies.

Principle: Course-required AI software and technologies should enhance the accessibility of learning and help facilitate student achievement of intended course learning outcomes.

Concern: Post-secondary institutions may lack the financial resources and hardware capability to provide open and equitable access to AI software and technologies used or required in courses .

Concern: Marginalized students may not have access to the financial resources or hardware necessary to afford or access paid or premium AI systems that may be required in their courses, perpetuating systemic inequalities in post-secondary education.

Concern: The *Responsible Use of Artificial Intelligence Directive* does not fully account for ensuring and enhancing accessibility for people with disabilities regarding the use of AI.

Recommendation: MCURES should provide additional funding and expand the eligible costs to the Training, Equipment, and Renewal Fund to provide post-secondary institutions with the adequate equipment to run AI softwares that are necessary or utilized in courses offered by the institution.

Recommendation: MCURES should expand the OSAP equipment allowance to include required AI software subscriptions/platform fees, and the necessary hardware upgrades where program delivery may require the use of AI systems.

Recommendation: MCURES should mandate that when AI software or platforms with AI integrations are course-required, licensing costs must be assumed by the institution.

Recommendation: The provincial government should task the AI Expert Working Group to create a Framework that include measures for accessibility systems for AI software use

Recommendation: The provincial government should task HEQCO to research how AI creates barriers to access for students with disabilities to inform legislative changes.

The provincial government should task the AI Expert Working Group to create and expand Ontario's Trustworthy Artificial Intelligence (AI) Framework to include measures for accessibility systems for AI software use that include consultation, transparency, audit, and accountability guidelines.

AI software is being increasingly integrated into post-secondary education through course delivery, assessments, and research. However, without deliberate policy intervention, access to such technologies will remain inequitable. Financial constraints and geographic location continue to limit many students' ability to engage with AI resources on an equal footing, despite their

growing relevance across academic disciplines and professional pathways.²⁵

At present, post-secondary institutions do not uniformly provide access to required or recommended AI platforms.²⁶ Many programs integrate tools such as ChatGPT, GrammarlyGO, or DALL-E in coursework without supplying institutional access or alternatives. This practice assumes that students can independently afford subscriptions or possess the necessary hardware to run such programs. In reality, these costs can represent a significant barrier to low-income students, especially in cases where access to AI is essential for completing assignments or acquiring in-demand digital skills.²⁷ This financial barrier perpetuates a stratified academic environment, privileging those with more resources. In addition, marginalized students, including in northern and rural communities and those from low-income backgrounds face compounded accessibility issues. Limited broadband infrastructure, outdated hardware, and financial precarity are persistent challenges in these regions.²⁸ AI software often requires reliable internet connections, up-to-date devices, and regular system upgrades, all of which are less accessible in rural and remote areas. Without targeted investments, students from these communities will be further excluded from academic and career opportunities in a rapidly digitizing world. To address these disparities, MCURES should expand both the scope and funding of the Training, Equipment, and Renewal Fund. Specifically, the fund should be adapted to support the installation and maintenance of AI software in campus computer labs across all publicly funded post-secondary institutions. This would allow students who cannot afford individual access to engage with AI tools through shared institutional infrastructure, ensuring no one is disadvantaged due to personal financial circumstances.

Additionally, the OSAP books, supplies, equipment and computer allowance must evolve to reflect the changing technological landscape. The current scope of the grant does not adequately support the acquisition of AI-related platforms and tools that are now increasingly integral to academic success. The Ontario portion of the allowance has a combined maximum of \$3,729 or actual costs, which neglects the ability of students who need to use AI ad hoc for support with schoolwork, rather than as a pre-determined set cost.²⁹ By broadening the eligible costs to include GenAI software, the allowance can better serve its intended purpose of

²⁵ Samo Varsik and Lydia Vosberg, The potential impact of Artificial Intelligence on equity and inclusion in education,” *OECD Artificial Intelligence Papers*, No. 23, OECD Publishing, Paris, <https://doi.org/10.1787/15df715b-en>.

²⁶ Dr. Nicole Johnson, “An Increasing Demand for Technology Use in Teaching and Learning: 2023 Pan-Canadian Report on Digital Learning Trends in Canadian Post-Secondary Education,” *Canadian Digital Learning Research Association*, 2023, p. 18, <https://www.cdlna-acrf.ca/wp-content/uploads/2023/12/2023-Pan-Canadian-Report-EN.pdf>

²⁷ Ibid.

²⁸ Samo Varsik and Lydia Vosberg, The potential impact of Artificial Intelligence on equity and inclusion in education,” *OECD Artificial Intelligence Papers*, No. 23, OECD Publishing, Paris, <https://doi.org/10.1787/15df715b-en>.

²⁹ Student Financial Assistance Branch, “Ontario Student Assistance Program: Full-Time OSAP Policy Manual 2020-21,” Ministry of Colleges, Universities, Research Excellence and Security, Version 2.1, October 2020 (unpublished).

promoting equitable access to education-enhancing technologies. Furthermore, where AI software or platforms with AI integrations are course-required, licensing costs must be assumed by the institutions rather than it being students' responsibility. Requiring students to independently purchase access to tools necessary for course completion is inconsistent with the principle of equitable access and risks creating a two-tiered system in which academic outcomes are shaped by financial means.

Equity in access to AI is not merely a matter of fairness—it is a prerequisite for ensuring that all students can participate meaningfully in an educational system that increasingly relies on advanced technologies. Without targeted interventions, students will continue to face uneven opportunities based on their ability to afford or access the digital tools that are shaping the future of work and learning. AI has the potential to serve as a transformative tool in post-secondary education, particularly in advancing accessibility and supporting diverse learning needs. AI-driven technologies; such as real-time transcription tools, adaptive learning platforms, and screen-reading software, can significantly enhance educational experiences for students with disabilities. However, these benefits are contingent on the deliberate and inclusive design, regulation, and deployment of AI systems. As mentioned earlier, post-secondary policies on AI use are lacking, which does not adequately guarantee that AI used in academic contexts are accessible to all students, particularly those with disabilities. The current *Responsible Use of Artificial Intelligence Directive* provides important guardrails for ethical AI use in the broader public sector, but it lacks specific directives regarding accessibility. As a result, there is no formal requirement for post-secondary institutions or AI developers to consider how students with physical, sensory, cognitive, or learning disabilities will interact with AI platforms.³⁰ This oversight leaves students vulnerable to exclusion, particularly when AI tools are embedded in course design, assessments, or institutional communications without accessible alternatives or supports. Addressing this gap requires a commitment to inclusive AI governance. The Ontario government should task the AI Expert Working Group with expanding the Trustworthy Artificial Intelligence (AI) Framework to explicitly include accessibility as a core principle. This expansion must go beyond general references to equity and incorporate robust, enforceable measures such as meaningful consultation with people with disabilities, clear transparency standards regarding how AI systems function and make decisions, and independent audits to assess accessibility performance. Accountability mechanisms must also be embedded, ensuring that institutions and developers are held responsible when AI systems fail to accommodate all users equitably.³¹ These elements are essential for building trust in AI as an enabler of accessible learning environments, rather than a barrier. Additionally, HEQCO should be tasked to research how AI creates specific barriers to access for students with disabilities, with findings used to

³⁰ Government of Ontario, “Responsible Use of Artificial Intelligence Directive,” *Government of Ontario*, last updated April 14, 2025, <https://www.ontario.ca/page/responsible-use-artificial-intelligence-directive>

³¹ Government of Ontario, “Ontario’s Trustworthy Artificial Intelligence (AI) Framework,”

inform legislative changes that bring disability-inclusive AI standards into formal policy frameworks.

Inclusive AI policy is not only a matter of compliance with accessibility standards, it is fundamental to fostering academic environments where all students can thrive. By proactively embedding accessibility considerations into provincial AI governance, Ontario can set a precedent for how digital innovation can be aligned with the rights and needs of marginalized learners to continue to better uphold *Responsible Use of Artificial Intelligence Directive* principles.

DATA COLLECTION AND SOURCING

Principle: Institutional-to-provincial level data allows more proactive development of policies and procedures in addressing concerns, barriers, or risks of use of AI within each individual post-secondary campus.

Principle: AI systems should be transparent about their data sources and limitations ensuring that they are designed to identify, mitigate, and manage bias rather than assume neutrality.

Principle: Students should be able to control how their intellectual property and data is used in data training sets.

Concern: The provincial government does not conduct enough research on AI with regards to use, systems impact, access, and integrity within post-secondary institutions' courses and students.

Concern: Post-secondary institutions lack adequate resources to conduct campus-level research on AI that is assessed consistently, in depth, and engages a high amount of students, staff, and faculty.

Concern: LLMs are trained on datasets that may contain embedded historical and structural biases or lack representativeness that disproportionately harm marginalized communities.

Concern: AI systems can be misused for harmful activities and raise data privacy risks due to unclear data storage and access practices.

Concern: Students' original work may be used in AI systems that collect their intellectual property for the purpose of training future models, resulting in future derivative works without their consent.

Recommendation: 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.

Recommendation: The provincial government should task the AI Expert Working Group to develop best practices on data sourcing and procurement of AI systems for post-secondary institutions relating to collection, administration, and usage.

Recommendation: 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.

Research on AI that is collaborative across governments and institutions can enable a proactive approach involving robust institutional & provincial level data collection. This can contribute to the development of policies and procedures that help address concerns, barriers, and risks for students regarding the use of AI on post-secondary campuses or in their programs off-campus. This kind of research is imperative with the heavy influence and current adoption of AI within post-secondary institutions and by their students. Consequently, it is important to address the lack of research on the positive and negative impacts of AI on post-secondary systems considering social, environmental, economic, and governance factors.³² Further, it would be helpful to understand AI access within post-secondary institutions and their courses, as well as student insights on the root causes of students not using AI and faculty resistance to adopt AI (such as financial or accessibility barriers, privacy concerns, and sustainability impacts). Lastly, assessing AI platforms and systems integrity across institutions within the province provides an understanding about the educational quality impacts, with seeing how AI use has advanced or harmed the integrity of academic outcomes and capabilities of the overall post-secondary institutions. This can help the provincial government uphold the first principle of under the Responsible Use of AI Directive, “AI is used to benefit the people of Ontario,” highlighting how the people utilizing and engaging with AI systems should be considered and should ensure the direct and indirect risks to be mitigated or balanced with benefits.³³

The largest obstacle for this research being conducted is the lack of provincial funding that can account for post-secondary program delivery and use within courses or course work; as the Blue Ribbon Panel Report shows, the lack of funding through provincial grants to post-secondary institutions has reduced the potential of growing institutional research.³⁴ Furthermore, post-secondary institutions themselves lack adequate resources to conduct

³² Adam Vanzella Yang and Daniel Akira Stadnicki, *Who is Using Generative AI in Higher Education?* (Ottawa, ON: The Conference Board of Canada, 2024),

https://fsc-ccf.ca/wp-content/uploads/2024/07/who-is-using-generative-ai-in-higher-education_2024.pdf

³³ Government of Ontario, “Responsible Use of Artificial Intelligence Directive,”

³⁴ Alan Harrison and Blue-Ribbon Panel on Postsecondary Education Financial Sustainability, “Ensuring Financial Sustainability for Ontario’s Postsecondary Sector,” Blue-Ribbon Panel on Postsecondary Education Financial Sustainability, 2021,

<https://files.ontario.ca/mcu-ensuring-financial-sustainability-for-ontarios-postsecondary-sector-en-2023-11-14.pdf> .

campus-level research on AI that is assessed consistently, in depth, and engages a high amount of students, staff, and faculty.

OUSA recommends that MCURES set aside funding to 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. Such a survey would be similar to how the Government of Ontario administer the Student Voices on Sexual Violence Survey in 2018, in which many valuable information was found and used to inform sexual violence prevention measures.³⁵

Data sourcing within AI algorithms should be something that can be monitored, audited, and structured to uphold the fourth principle under the Responsible Use of Artificial Intelligence Directive, where “AI use is human rights affirming and non-discriminatory.”³⁶ Currently, AI algorithms present risks and concerns around the sourcing of data which may promote selective, distortive, reductive, and/or biased use of data and affect the outcomes of commands prompted.³⁷ Results from command inputs into AI platforms should be transparent and not be selective towards and distorting facts, reducing the corresponding answers to substantive information to a command, or having a conscious or unconscious bias towards specific outcomes of commands or the sourcing of data in processing commands.

OUSA’s biennial survey found that about 58 percent of students identify data privacy and bias as a concern for using AI-driven educational tools.³⁸ AI companies and institutions using AI need to be equipped with the research necessary into identifying and mitigating three key areas of bias of AI systems. The first is data sources having biases that perpetuate population group-specific assumptions which affect the commands outcomes. LLMs are trained on datasets that may contain embedded historical and structural biases or lack representativeness that disproportionately harm marginalized communities. The second would be algorithmic biases where flaws in the computing and calculation of outcomes from commands create bias even in the absence of unbiased data sourcing. The last, is the most natural one to occur, and one that students approach in all facets of academia -human bias where the designers, developers, or users may have unconscious bias regarding the command or functionality of the AI system. To be able to conduct the necessary private-public sector research, the Ministry of Public and Business Service Delivery and Procurement should provide a one-time funding expansion for the AI Expert Working Group to work with market leading AI companies to assess, audit, and research the risks, prevalence, and impacts of AI algorithms data sourcing. This will identify

³⁵<https://ontariosuniversities.ca/wp-content/uploads/2023/12/COU-Overview-of-Survey-Findings.pdf#:~:text=Overa%20C%2079.8%20per%20cent%20of,at%20a%20university%2Dsponsored%20activity>

³⁶ Government of Ontario, “Responsible Use of Artificial Intelligence Directive,”

³⁷ Bernard Rizk, “AI for all: Addressing bias, discrimination and ethics in artificial intelligence,” *University of Ottawa*, July 2, 2024,

<https://www.uottawa.ca/faculty-engineering/news-all/ai-all-addressing-bias-discrimination-ethics-artificial-intelligence>

³⁸ Unpublished data from OUSA’s 2024 Ontario Undergraduate Student Survey.

circumstances where AI sourcing is potentially biased, selective, distortive, and/or reductive. Upon conclusion of this research, they should task the AI Expert Working Group to develop a publicly available report that will outline any policy and/or algorithm changes, recommendations for institutions and companies, or remedies to address any risks flagged in the report.

Students and faculty interacting with AI tools on campus are often unable to assess the reliability or neutrality of those systems due to a lack of accessible information about how they operate. Without standardized disclosure requirements, institutions may procure AI systems whose training data composition, known biases, and documented limitations remain untransparent to end users. To prevent this, 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.

Beyond bias in outputs, AI systems also raise concerns about how student data is stored, accessed, and used once it enters a platform. When post-secondary institutions adopt AI tools, whether it is for administrative functions, learning management or academic support, students may have little visibility into where their data is sent, how long it is retained and who has access to it. Unclear or inconsistent data storage and access practices creates conditions where personal information can be exposed and misused without student consent. The provincial government must therefore ensure that any AI systems procured for use in post-secondary institutions meet clear enforceable standards for data storage, access and permissible use.

On top of the examples mentioned, students often mentioned a big concern about the use of their work (essays, code, creative work, or assignments, etc.) to be used for training future AI models. When students submit work through AI-integrated platforms, their intellectual property may be collected and used to train future versions of those systems, resulting in derivative works being generated without their consent. This creates the risk of the original student author being flagged by plagiarism checkers even when they submit their original work. Some enterprise-grade AI tools have begun to address this concern: Microsoft Copilot's enterprise version for example does not use inputted data for future model training. The provincial government should require that post-secondary institutions only procure AI systems that clearly disclose whether student inputs are used for model training and that students be provided with meaningful opt-out mechanisms where training data collection occurs. At the core, students should retain control over how their intellectual property is used, and institutions should be required to reflect this in their AI procurement standards.

POLICY STATEMENT

Whereas: Students should be informed of permissible use and regulation of AI in courses prior to enrollment.

Whereas: AI should complement instructor-led teaching and support student learning without replacing core instructional or academic supports to protect educational quality and student learning outcomes.

Whereas: Academic integrity accusations made towards students regarding AI usage should be based on reliable and trustworthy evidence.

Whereas: Post-secondary admissions processes should be transparent about how AI is used ensuring that institutions are held accountable in the fair evaluation of all applicants.

Whereas: Students should have access to information regarding the collection, utilization, and disclosure of personal information to AI tools approved for use at their post-secondary institutions.

Whereas: Students should work alongside staff, faculty and membership from their representative associations to develop an AI framework that represents the student perspective.

Whereas: Institutions should have sufficient AI governance capacity to oversee AI use, integrity, privacy, and security across learning, teaching, assessment, and research.

Whereas: Institutions should adequately support faculty and staff in enhancing their knowledge to conduct research and be consulted on AI use or advancements.

Whereas: Institutions should adequately research and support students in enhancing their knowledge on the academic use, regulation, and impacts of AI.

Whereas: Advancing sustainable AI technology can help reduce the environmental impact of increased AI use within post-secondary institutions.

Whereas: Provincial legislation and regulations should aim to ensure that AI technologies are implemented in beneficial ways that maintain professional and academic integrity, while safeguarding privacy and personal information.

Whereas: Post-secondary students should have input into the development and implementation of provincial legislation and regulations around AI use, particularly within post-secondary learning.

Whereas: AI use should have a clear and defined framework required across all institutions to ensure that use within post-secondary institutions is transparent, trustworthy, and serves everyone.

Whereas: Students should have equitable access when utilizing or accessing course-required AI software and technologies.

Whereas: Course-required AI software and technologies should enhance the accessibility of learning and help facilitate student achievement of intended course learning outcomes.

Whereas: Institutional-to-provincial level data allows more proactive development of policies and procedures in addressing concerns, barriers, or risks of use of AI within each individual post-secondary campus.

Whereas: AI systems should be transparent about their data sources and limitations ensuring that they are designed to identify, mitigate, and manage bias rather than assume neutrality.

Whereas: Students should be able to control how their intellectual property and data is used in data training sets.

Be it resolved that: 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 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.

Be it further resolved that (BIFRT): The provincial government should develop a Post-Secondary Education Subcommittee within the AI Expert Working Group consisting of staff, faculty, student, and membership from their representative associations.

BIFRT: The provincial government should provide post-secondary institutions with funding to establish an interdisciplinary working group composed of staff, faculty, students and membership from their representative associations to inform the development of AI framework(s), best practice(s), and/or policy(ies) that are discipline-specific.

BIFRT: MCURES should fund privacy-preserving assessment design that reduces or discourages inappropriate AI use in line with the Universal Design for Learning (UDL) principles.

BIFRT: MCURES should prohibit the use of AI detection systems in academic integrity investigations across post-secondary institutions, given their high risk of false accusation.

BIFRT: MCURES should mandate a standardized disclosure of AI usage, as required by FIPPA, in a manner easily accessible to students prior to course enrollment. .

BIFRT: MCURES should require post-secondary institutions to implement mandatory training for faculty and staff on permissible use of AI for use in teaching, learning, assessment, and research.

BIFRT: MCURES should mandate that all post-secondary institutions have a clear and timely way for students to request human reviews of AI grading processes and decisions.

BIFRT: MCURES should require institutions to adopt AI use guidelines that ensure AI systems enhance, but not replace instructor-led teaching, course material development, and human-delivered student supports.

BIFRT: The provincial government should establish guidelines regulating the use of AI in post-secondary admission processes including requirements for transparency, and human oversight in admission decisions.

BIFRT: The provincial government should require all post-secondary institutions to make all

Privacy Impact Assessments (PIA) publicly available and accessible, including for AI software and systems utilized.

BIFRT: 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.

BIFRT: The provincial government should 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, hallucination, inherent biases, privacy concerns, ethical use, and its benefits to learning.

BIFRT: The provincial government should implement innovation incentives at post-secondary institutions focused on the possibilities of AI and economic development.

BIFRT: The provincial government should provide funding for publicly-available research on AI, with specific focus on how AI impacts student well-being, education quality, integrity, equity, and accuracy in post-secondary institutions.

BIFRT: The provincial government should task HEQCO to produce best practices for institutions and policy recommendations for the provincial government based on research conducted regarding AI's impact on student well-being, educational quality, integrity, equity, accuracy, and student's mental health in post-secondary institutions.

BIFRT: MCURES should provide funding to support baseline AI governance capacity at every institution, scaled by enrollment.

BIFRT: The provincial government should task the AI Expert Working Group to examine 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.

BIFRT: The provincial government should provide grant funding for research in each university on student competencies and relationships with AI's consequent factors to inform AI's integration into post-secondary education, current levels of AI literacy in students.

BIFRT: The provincial government should legislate clear and specific statutory guardrails around AI use and compliance in post-secondary institutions.

BIFRT: Based on the implementation of the Post-Secondary Education Subcommittee, 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.

BIFRT: MCURES should provide additional funding and expand the eligible costs to the Training, Equipment, and Renewal Fund to provide post-secondary institutions with the adequate equipment to run AI softwares that are necessary or utilized in courses offered by the institution.

BIFRT: MCURES should expand the OSAP equipment allowance to include required AI software subscriptions/platform fees, and the necessary hardware upgrades where program delivery may require the use of AI systems.

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BIFRT: The provincial government should task the AI Expert Working Group to develop best practices on data sourcing and procurement of AI systems for post-secondary institutions relating to collection, administration, and usage.

BIFRT: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.