RCSI Generative Artificial Intelligence (AI) Usage Policy summary

This policy outlines RCSI's commitment to the **ethical, safe, and responsible adoption of Generative Artificial Intelligence (GenAI)** across education, research, and professional practice. As AI tools become increasingly embedded in academic and clinical contexts, RCSI sets out clear expectations to ensure their use strengthens — rather than compromises academic integrity, data protection, and institutional values.

At its core, the policy aims to **support innovation while protecting people, information, and standards**. It establishes boundaries that safeguard RCSI's intellectual property, uphold cybersecurity, and ensure that learners and staff engage with AI transparently and appropriately. A key institutional decision is the provision of **Microsoft Copilot as the preferred AI platform**, ensuring enterprise-level data protection and compliance with GDPR.

The policy emphasises six overarching principles:

- **Accountability**: Users remain responsible for verifying AI outputs and ensuring they align with RCSI's mission to advance human health.
- **Transparency**: All AI involvement in academic or research work must be acknowledged, with clear documentation of tools used, based on formal guidelines (e.g. module/programme lead instructions, funder or journal standards).
- **Respect & Equity**: AI must be used in ways that avoid bias, uphold dignity, and support inclusive practice.
- **Data Protection, Privacy, Cybersecurity and Intellectual Property**: Personal, confidential, or sensitive data may not be uploaded to AI tools; GDPR compliance and strong security practices are mandatory.
- **Integrity in Teaching, Learning, and Research**: AI can support learning and scholarship but must never replace original thinking, validated research methods, or human oversight.
- **Sustainability** - The evaluation of generative AI solutions should consider both resource and environmental impacts.

The policy also outlines responsibilities across the organisation from staff modelling ethical use, to learners engaging with AI in ways that enhance authentic learning, to academic units contextualising local guidance. It defines unacceptable uses, including uploading confidential data, generating academic work without disclosure, or allowing AI to influence high-stakes decisions without human review.

Finally, RCSI commits to **ongoing training, capacity building, and governance**, recognising the rapid evolution of AI technologies. Through organisation-wide oversight, continuous monitoring, and alignment with national and EU regulatory frameworks, the policy ensures that AI is adopted in a way that strengthens RCSI's culture of excellence, integrity, and innovation.

On page 26 of this document, a checklist has been included which a user should refer to when using GenAI to ensure appropriate adherence to the RCSI GenAI policy.

RCSI Generative Artificial Intelligence (AI) Usage Policy

Version Control

Version 1	Approved by	Date
	AI Working Group	September 2025
	AI and Digital Health Ct	November 2025
	Senior Management Team	December 2025
	Academic Council	January 2026
	Medicine and Health Sciences Board (MHSB)	February 2026
	Surgery and Postgraduate Faculties Board (SPFB)	TBC
Version 2	RCSI AI and Digital Health Committee	September 2026

Definitions

Academic Integrity	The commitment to and demonstration of honest and moral behaviour in an academic setting by the enrolled learner.[1]
AI Summarisation	Machine learning (ML) models used to generate a concise synopsis from text, documents, etc.[2]
Assessment	The assessment of learning means inference (e.g. judgement or estimation or evaluation) of a learner's knowledge, skill, or competence by comparison with a standard[3]. Examples of assessments include examinations, essays, presentations, Objective Structured Clinical Examinations (OSCEs), individual or group projects, etc.

[1] See RCSI Academic Integrity Policy https://vle.rcsi.com/course/view.php?id=684&section=3
[2] https://cloud.google.com/use-cases/ai-summarization
[3] https://www.qqi.ie/sites/default/files/2022-09/assessment_and_standards-revised-2022.pdf

Artificial intelligence (AI)	An AI system means a machine-based system that is designed to operate with varying levels of autonomy and that may exhibit adaptiveness after deployment, and that, for explicit or implicit objectives, infers, from the input it receives, how to generate outputs such as predictions, content, recommendations, or decisions that can influence physical or virtual environments.[4]
Generative AI (GenAI)	Generative AI (GenAI) refers to AI models and systems that generate new content, such as text, images, music, or videos, that resemble human-created content.
Large Language Model (LLM)	Advanced AI systems are trained on vast datasets to understand and generate human language.
Learner	A student, doctoral scholar, researcher, postgraduate trainee, member or fellow registered on a course, examination or training programme leading to an RCSI accredited qualification aligned to the National Framework of Qualifications (NFQ) or Continuing Professional Development (CPD) credits or as part of a specialist postgraduate training pathway.
RCSI	RCSI is a University of Medicine and Health Sciences, and a surgical Royal College, which includes university schools, postgraduate faculties, professional services departments, academic departments, university-wide academic centres, research and innovation centres, laboratories, and branch campuses.
RCSI personnel	Staff, learner or any network authorised user with access to RCSI IT systems, including: • RCSI employees: full time, part time, permanent and contract • Researchers • Postgraduate students/scholars and undergraduate students

[4] https://artificialintelligenceact.eu/

	• Individuals with honorary, adjunct, visiting, emeritus or associated positions
Unauthorised Content Generation (UCG)	The production of academic work, in whole or in part, for academic credit, progression, or award, whether or not a payment or other favour is involved, using unapproved or undeclared human or technological assistance (Foltynek, T, 2023).

Executive Summary

This policy applies to all RCSI staff, learners and IT network users. The primary aim for introducing this policy is to establish some boundaries for best practice to (a) support organisational development in the adoption of new technologies (b) reinforce cybersecurity (c) safeguard academic integrity and (d) protect RCSI's intellectual property (IP).

RCSI has made an institutional decision to provide all RCSI staff, learners and IT network users with access to Copilot LLM as part of our Microsoft licencing agreement. This is the preferred system for processing any RCSI related content through generative AI. The rationale for this is outlined in section 7.1.1. Users of other AI tools for RCSI related business are requested to reflect on the principles of this policy before processing any data or IP to ensure no breach or risk will occur.

1. Introduction

This policy outlines RCSI's position on the impactful, ethical and responsible use of Artificial Intelligence (AI) by staff and learners or any individual or group representing RCSI in any way. It defines acceptable practices across education, research, and administration while maintaining academic standards and institutional integrity.

The purpose of this policy is to:

- Provide guiding principles on the ethical, effective, and human-centred use of AI in academic and professional contexts;
- Safeguard academic integrity and uphold the value of independent scholarly and clinical judgment;
- Ensure compliance with legal, regulatory, and professional standards, including cyber security, data protection, privacy, and intellectual property;
- Provide a framework to foster AI literacy and informed / appropriate use of AI among learners, staff or other personnel;
- Promote the fair, inclusive, and responsible use of AI, while promoting equitable access to AI tools and resources;

This policy reflects RCSI's core values:

- **Respect**: ensuring that AI use upholds human dignity, academic integrity, and privacy
- **Collaboration**: encouraging shared responsibility and dialogue across disciplines and roles
- **Scholarship**: maintaining rigorous academic standards in a changing technological landscape
- **Innovation**: enabling thoughtful experimentation and informed adoption of new tools

It aims to foster accountability, by setting clear expectations for ethical and professional conduct in the use of AI. Importantly, this policy complements the existing RCSI academic integrity policy, codes of conduct, and digital technology policies, and will evolve as AI technologies continue to develop.

2. Guiding Principles

2.1 Accountability

RCSI's mission is to educate, nurture, and discover for the benefit of human health. Any GenAI systems that are developed and/or used as a tool must reflect the ethos of our mission statement and be used to serve the communities where we work. The user of the GenAI system will be solely responsible/accountable for their use of this system and should sense check the validity of all outputs produced by the GenAI system.

2.2 Transparency

It is essential that when GenAI has been used for education or research purposes, users follow formal guidelines (e.g. module/programme lead instructions, funder or journal standards) on disclosure on how and where GenAI has been used and ensure that all information, ideas, or solutions are correctly attributed. GenAI outputs should provide clear, traceable, and accessible information detailing how GenAI has been engaged.

2.3 Respect

Many GenAI models have been trained using datasets that contain inherent biases and stereotypes. As a result, the output may inadvertently reinforce these biases and inaccuracies. Users must employ critical thinking and analysis to ensure that inputs and outputs consider the principles of equality, diversity, and inclusion while avoiding discrimination against minority groups, including but not limited to ethnic and religious minorities, women, LGBTI+ and those from lower socio-economic groups. The user has a duty of care to ensure that all content and outputs are used in a way that is balanced and fair.

2.4 Data Protection, Privacy, Cybersecurity and Intellectual Property

All personal data, research data, and intellectual property (IP) must be protected. Users must understand how any GenAI tool stores and uses uploaded data, and must not upload personal or research data without explicit consent and ethical approval (see section 6). Microsoft Copilot is the preferred platform; alternatives may be used provided they comply with this policy and are approved by the Cyber Security team (itsecurity@rcsi.ie). Responsibility for safe, compliant use rests with the procuring department or school. All RCSI network users have a duty of care to protect the organisation's IT infrastructure and IP from undue risk.

2.5 Integrity in Teaching, Learning, and Research

AI tools can meaningfully support teaching, learning, and research but must not substitute for original thinking, academic rigour, or validated research methods. The intellectual contribution of students, educators, and researchers must remain genuinely their own, with AI used as an aid rather than a replacement for critical engagement. All AI-generated content must be reviewed, verified, and contextualised by the user before it is relied upon or submitted. Where AI has been used in the production of academic or research outputs, this must be disclosed transparently in accordance with RCSI's guidelines and relevant disciplinary norms. Human oversight and professional judgement remain essential at every stage of the educational and research process.

2.6 Sustainability

Generative AI systems consume significant energy and water resources and carry a measurable environmental cost. RCSI acknowledges these impacts and expects staff and students to use AI tools purposefully, avoiding unnecessary use where less resource intensive alternatives exist. Staff and students are encouraged to consider environmental cost as one factor in deciding whether and how to use generative AI, in keeping with the University's broader sustainability commitments.

3. Roles and Responsibilities

3.1 Staff Responsibilities

Academic, research, and professional staff at RCSI play a vital role in upholding academic integrity while navigating the use and/or integration of Artificial Intelligence (AI) into teaching, learning, assessment, research and operations. Staff are expected, with appropriate supports and training (see section 3.4), to model ethical AI use, educate learners on responsible practices, and ensure that AI use supports learning and research outcomes without compromising academic or research standards.

Key Responsibilities**:**

Promote academic and research integrity: staff must uphold and reinforce the values outlined in the RCSI Academic Integrity Policy and RCSI Code of Research Conduct – honesty, fairness,

trust, respect, responsibility, and courage[5] when using or addressing AI in academic contexts.

All staff should critically assess the accuracy of outputs generated by AI for summarisation, minute/note taking or generation of base content for reports or official documents.

3.2 Learner Responsibilities:

Learners at RCSI are expected to engage with Artificial Intelligence (AI) in a manner that upholds academic integrity and reflects the values of RCSI. The responsible use of AI should support, not substitute, meaningful learning, original thought, and professional development.

Key Responsibilities:

- Understand and comply with RCSI's academic integrity[6] expectations and become familiar with the RCSI Academic Integrity Policy, and other relevant policies;
- Complete the required academic integrity training, which includes guidance on acceptable and unacceptable uses of AI;
- Comply with the rules around AI use in each module, activity, and assessment. Where the permitted use of AI is unclear, learners must proactively seek clarification from the relevant staff;
- Use AI tools only as permitted by the school/department, programme, module, and assessment guidelines. Submitting AI-generated content as one's own work without acknowledgment is considered academic misconduct and may be subject to RCSI Disciplinary Regulations, which includes sanctions up to and including expulsion from RCSI;
- Acknowledge and cite AI use transparently in line with programme guidelines;
- Use AI tools only in ways that support learning and not in ways that compromise skill-building and critical thinking;
- Learners are responsible for adhering to AI restrictions outlined for each assessment, including in clinical or professional evaluations.

[5] https://academicintegrity.org/aws/ICAI/pt/sp/values

[6] See RCSI Academic Integrity Policy https://vle.rcsi.com/course/view.php?id=684&section=3

3.3 Role of Academic Units:

Faculties, schools, departments, and centres are responsible for local adoption and contextualisation of this policy.

Key Responsibilities:

Contextualising AI guidance

Academic units are responsible for interpreting this policy in ways that are relevant to the nature of their discipline and the intended learning outcomes of their programmes. This may include defining acceptable AI use for particular modules, courses, or assessment types.

Establishing clear guidance for learners and staff

Academic units should ensure that learners and staff are provided with clear, consistent information about how AI may or may not be used within each academic context. This includes incorporating AI expectations into module descriptors, assessment briefs, and marking criteria.

Supporting academic integrity

Academic units must promote a culture of academic integrity by modelling responsible AI use and ensuring alignment between policy, teaching, assessment design, and professional standards.

3.4 RCSI Responsibilities

RCSI should ensure that the necessary resources are in place to support the development of AI literacy and capacity among all members of its academic and professional community.

4. Unacceptable Uses

It is acknowledged that AI can be used positively and creatively to enhance certain learning activities.

However, instances of unacceptable uses of AI in university/professional training settings, grounded in guidance from international regulatory frameworks, examples from higher education

policy exemplars, and professional standards exist. Resources include the EU's AI Act (2024/1689), which mandates risk-based controls, transparency, human oversight, and AI literacy for all users. The resulting examples listed below present role-specific examples of unacceptable AI use across four core domains: (a) learners, (b) teaching staff, (c) researchers, and (d) professional services.

For the avoidance of doubt, you must not:

- Accept AI content without human evaluation or critique;
- Upload confidential or sensitive data (e.g., personal records);
- Use AI to make decisions that impact academic, professional, or personal situations without a human checking or approving the outcome first (e.g., automatically assigning summative grades or marking exams using AI without a teacher verifying the result);
- Fail to document AI usage (type of tool, version, and types of input or output) where required and as outlined in section 2.2
- Apply AI for sensitive decision-making (e.g. shortlisting, hiring, disciplinary procedures, welfare, patient care/diagnosis) without human oversight.
- Use GenAI to create or manipulate images, video, audio or other synthetic content that is deceptive, harmful, discriminatory, harassing or misleading, particularly where it could be mistaken for an authentic representation of a person, event, clinical or scientific subject.
- Use GenAI to generate, recreate or manipulate the RCSI logo or other official brand assets contrary to the RCSI Brand Guidelines.

These examples are not intended to be exhaustive.

5. Academic and Research Integrity

RCSI teaching staff, researchers, and learners should adhere to the highest standards of academic and research integrity to preserve the credibility of scholarly work, foster trust within the academic community, and ensure that knowledge advances through honest inquiry and ethical practice. This RCSI AI policy is interlinked with other related RCSI policies and guidelines. Teaching staff and learners must familiarise themselves with and comply with the following:

- RCSI Academic Integrity Policy[7]
- RCSI Ethical Guidance Framework for AI in Learning, Teaching and Assessment[8]
- RCSI Guidance on the Use of Generative AI in Learning, Teaching and Assessment[9]

In addition, learners are required to complete the following:

- RCSI Academic Integrity Course

In the context of this AI policy, the RCSI Academic Integrity Policy sets out that the unauthorised use of generative AI constitutes academic misconduct and may be subject to RCSI Disciplinary Regulations, which includes sanctions up to and including expulsion from RCSI. This includes any attempt to seek unfair advantage in relation to any academic activity including through unauthorised content generation.

Researchers remain responsible for accuracy, originality, and compliance with institutional, legal, and funder policies, ensuring AI-generated content is evaluated for validity and bias. AI cannot be credited as an author, and its use must be disclosed in ethics applications and research outputs. All activities must align with the European Code of Conduct for Research Integrity, national policies, and RCSI's codes on research, academic integrity, and intellectual property.

6. Research and Innovation

6.1 Research Integrity and AI

RCSI requires that its researchers apply the highest standards of honesty and integrity to all aspects of their research, including the application for funding, experimental design, generation and analysis of data, publication of results, acknowledgment of the contributions of others (both direct and indirect), and the declaration of conflicts of interest.

The use of AI must not compromise these standards, or the foundational principles of research integrity, and researchers should conduct all activities in accordance with the four core principles

[7] See RCSI Academic Integrity Policy https://vle.rcsi.com/course/view.php?id=684&section=3
[8] RCSI. 2024. Ethical Guidance Framework for AI in Learning, Teaching and Assessment. [Internal document]
[9] RCSI. 2024. Guidance on the Use of Generative AI in Learning, Teaching and Assessment. [Internal document].

of the European Code of Conduct for Research Integrity. Accordingly, the use of GenAI tools must align with these principles.

Specifically:

- Researchers must not use AI to fabricate, falsify, or misrepresent data, analysis, or authorship;
- AI-generated content must not replace rigorous academic inquiry, original thinking, or validated methodology;
- Proper attribution must be given for AI assistance, and the boundaries of machine and human contributions must be made clear;
- All use of AI must be undertaken with transparency and accountability, and any concerns about potential misuse must be reported in line with institutional research misconduct procedures (RCSI Procedure for the Investigation of Misconduct in Research)[10];

6.2 Ethical Use of AI in Research

Researchers must uphold ethical standards when using AI in research by ensuring transparency, responsibility, and rigorous evaluation. All use of AI tools must be clearly disclosed in applications for ethics approval and in research outputs such as publications, theses, and grant applications. Researchers remain accountable for the accuracy and originality of their work and must not use GenAI to bypass critical scholarly processes. GenAI-generated content must be verified for factual accuracy, scientific validity, and bias, with proper citation and acknowledgement where applicable.

GenAI tools cannot be credited as authors; only individuals with substantial intellectual contributions should be listed, in line with academic standards. Use of AI must comply with data privacy laws and institutional policies, including GDPR and ethics approvals, especially when processing personal data. Principal Investigators/Supervisors are responsible for guiding ethical GenAI use among learners and research teams, and collaborative projects must establish shared expectations for GenAI usage. Finally, researchers must ensure compliance with the policies of funders, publishers, and partners regarding GenAI use.

[10] RCSI Code of Research Conduct. [RCSI-Code-of-Research-Conduct.pdf]

Use of Gen AI must align with:

- European Code of Research Conduct[11];
- National Policy Statement on Ensuring Research Integrity in Ireland[12];
- Ireland's National IP Protocol 2019[13];
- RCSI Code of Research Conduct[14];
- RCSI Academic Integrity Policy[15];
- RCSI Intellectual Property Policy 2024[16].

7. Data Privacy and Security

7.1 Overview of Data Protection

The '**General Data Protection Regulation' (GDPR)** is the law which applies to most kinds of processing of personal data and it applies directly in Ireland and all EU members states, along with further national rules set out in Ireland's Data Protection Act 2018.

The Data Protection Commission (DPC) in Ireland is responsible for the implementation of the GDPR and related law in Ireland. In its online guidance "**AI, Large Language Models and Data Protection**" (DPC 2024), it notes that when using AI systems such as Gen AI platforms (i.e. Large Language Models) there is potential for personal data processing both in the development of an AI system and its further usage[17].

The guidance specifies, that depending on the context and scope of the personal data processing, there may be associated risks that individual users and institutions including universities need to be aware of from the start when any Gen AI platform is used. These include the following:

[11] https://allea.org/code-of-conduct/
[12] https://www.iua.ie/wp-content/uploads/2024/12/National-Policy-Statement-on-Ensuring-Research-Integrity-in-Ireland-Dec-2024.pdf
[13] https://www.knowledgetransferireland.com/Reports-Publications/Ireland-s-National-IP-Protocol-2019-.pdf
[14] RCSI Code of Research Conduct. [RCSI-Code-of-Research-Conduct.pdf]
[15] [15] See RCSI Academic Integrity Policy https://vle.rcsi.com/course/view.php?id=684&section=3
[16] RCSI. (2024). Intellectual Property Policy. [RCSI IP Policy 2024.pdf]
[17] Data Protection Commission (2024). *AI, Large Language Models and Data Protection.* Available at https://www.dataprotection.ie/en/dpc-guidance/blogs/AI-LLMs-and-Data-Protection. Accessed 7 August 2025.

- There may be a tendency by the AI system to use large amounts of personal data during any training phases, sometimes unnecessarily and without an individual's knowledge, agreement or permission.
- There may be issues for individuals and institutions arising from the accuracy or retention of personal data used (or generated) – for example, in situations where the outputs of AI systems are used as part of a process to make decisions.
- There may be issues for individuals and institutions, if AI systems share information, based on personal data, with others for purposes you are not aware of or do not agree with or who do not properly secure the data.
- Inaccurate or incomplete data uploaded to an AI system may cause biases in AI systems, for individuals or for others that lead to decisions that affect data protection rights in some way.
- Where new personal data becomes part of training data for newer, refined versions of an AI system, this may expose you or others to these kinds of risks – where they were not before.

Accordingly, when using any AI system, RCSI personnel, need from the outset to be aware of what they are using, how they interact with it and what the consequences are, regardless of the useful or creative results that may accrue by doing so. Where personal data is involved, GDPR and data protection regulations come into play, for individuals and organisations using AI systems, as well as for the AI system providers.

7.1.1 Microsoft Copilot

RCSI provides access to the Microsoft Copilot LLM to all staff and students as part of the institution's Microsoft licensing agreement. Copilot was selected for the following reasons:

- **Enterprise Data Protection** At the time of writing, data storage location and training data usage policies remain unclear with many leading LLM providers. Copilot addresses these concerns through a comprehensive Enterprise Data Protection agreement that ensures:
  - All data input remains private to individual conversations
  - User data is not used for model training purposes
  - Data is stored within appropriate geopolitical boundaries to maintain GDPR

compliance

- **Access to Latest Technology** Copilot utilises up-to-date models, currently GPT5, ensuring all staff and students have access to the latest AI capabilities.

Where there is a compelling need, other platforms may be used as long as they:

(a) Comply with the policy requirements herein. In particular, regarding processing of IP or sensitive data.

(b) Any new platforms being used within the RCSI network or for RCSI related business may be reviewed and approved by the Cyber Security team, contactable at itsecurity@rcsi.ie. Responsibility for safe and compliant usage of any platforms resides within the department or school procuring and using that system.

7.2 Data Protection Implications for Artificial Intelligence use

In order to assess whether the use of any AI system is appropriate for use by RCSI, personnel the risks associated with any processing of personal data with a chosen AI system must be assessed so that RCSI can ensure the processing is compliant with GDPR, where the personal data moves outside the control of RCSI. Having assessed its procedures for the processing and retention of any personal data uploaded to it, Microsoft Copilot for web is the LLM platform offered by RCSI to staff and learners for use in the course of their work, training and study.

7.2.1 GenAI Platform Usage considerations

Before using a GenAI platform, in particular one other than Microsoft Copilot all RCSI personnel should scrutinise the Privacy and Data Protection policies of the platform they are considering using and become aware of:

1. what personal data it uses;
2. how it is used;
3. where the personal data goes in situations where a third-party is involved in the processing;
4. whether it is retained by the provider of the AI product or re-used in any way, and
5. how the platform allows them to comply with GDPR requirements.

Failure to do this can give rise to risks from unwanted, unneeded or unanticipated processing of personal data input whether input into an AI platform or used for training or fine-tuning. Such processing may breach several GDPR principles, particularly lawfulness, fairness, transparency, and purpose limitation.

Any sensitive personal data as defined in the GDPR (including personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data and biometric data, data concerning health, or data concerning a natural person's sex life or sexual orientation) must never be inputted into any AI tool. This includes even when the data is pseudonymised.

7.2.2

Regarding the conduct of research where the use of AI is proposed as part of the research methodology, full details of it, including the provision of a Data Protection Impact Assessment, must be provided to Research Ethics Committee (REC) for its review. All of the REC requirements, including those relating to the use of AI and data protection, as part of its grant of ethical approval, must be adhered to by researcher(s) during the conduct of the research. It should be explained to any participant involved in a research study that personal data may undergo analysis by an AI tool, which if applicable to the study must be GDPR compliant. The use of AI in the research project outside of that specified in the application for ethical approval is not permitted without further REC review and approval.

7.2.3

Any concerns regarding GDPR or Data Protection, including that relating to the use of an AI system, must be reported to dataprotection@rcsi.ie without delay.

7.2.4

For further information regarding AI and Data Protection, please refer to the Data Protection Commission at https://www.dataprotection.ie/en/dpc-guidance/blogs/AI-LLMs-and-Data-Protection.

7.3 Copyright & Intellectual Property and Artificial Intelligence

Intellectual property (IP) is the term given to property rights of something that is the product of someone's mental efforts. It is the means by which an individual's creativity and innovation can be owned in much the same way as they can own physical property.[18]

Copyright is a type of IP right. It is the legal form of protection used by the creator or author of such work as books and scientific papers, to protect the tangible form of all or part of their individual work[19].

Appropriate permission must be provided prior to the input by RCSI personnel of the following data types, into any Generative AI tool:

- Any data that constitutes RCSI intellectual property. Use involving research data, confidential partner information from the PI. For potentially patentable material, prior written approval from the PI and RCSI technology transfer office (TTO) will be required.Any data related to learners' intellectual property e.g. assessment submissions where the learner has not explicitly consented for their data to be used with AI. This applies even when the assessments are pseudonymised.
- Any data that is protected by copyright.

7.4 Confidentiality Implications for Artificial Intelligence use

7.4.1

Regardless of the platform utilised, certain types of data must never be inputted into any AI tool, including Microsoft Copilot®. These include:

- Passwords and usernames.
- Any documentation where an expectation of confidentiality exists e.g. confidential emails, reports, research or survey data, contracts, invention disclosure forms, etc.

7.4.2

If using an AI platform for personal reasons, use of RCSI emails as usernames is prohibited.

[18] Intellectual Property Office of Ireland. Available at https://www.ipoi.gov.ie/en/types-of-ip/copyright1/understanding-copyright/. Accessed 13 August 2025.

[19] https://www.ipoi.gov.ie/en/types-of-ip/copyright1/understanding-copyright/

7.4.3

If using an AI platform other than Microsoft Copilot in connection with their role, choose a strong and unique password i.e. do not set up an account with your RCSI password.

7.4.4

Should RCSI make available access to enterprise or organisational licensed AI tools, it is the expectation that these will be used as opposed to individual accounts when using it for work purposes, e.g. it is expected that where undertaking work in your role as either RCSI staff or learner, using Microsoft Copilot®, users will be logged into their RCSI Microsoft account rather than any personal accounts.

7.4.5

Where available, use settings within the AI tool to disable or opt out of the data inputted being used for training or machine learning. This will sometimes be worded as 'Help us make this better for others' or similar. It is important to understand how it works and read the user guidance.

7.4.6

Be aware that some tools have terms and conditions that may restrict the purposes for which they can be used. In many cases, these terms will also require you have the authorisation of RCSI to accept those terms thereby binding the organisation to a legal contract. You must read the terms and conditions and the small print so you fully understand what you are agreeing to.

8. Training and Capacity Building

In support of the ethical, effective, and informed use of AI across the organisation, RCSI is committed to building AI literacy and capacity among all members of its academic, research, professional and learning community.

Provision and Access

RCSI will provide a range of options for staff upskilling including:

- **Open workshops and e-learning**: support the foundational knowledge of all staff regardless of

role;

- **Custom training sessions**: specific provision tailored for using AI in Teaching and Learning, AI in Research, AI for efficiency and AI for Senior Leaders;
- **Community of Practice/Special Interest Group:** to foster ongoing learning and experience-sharing. The Health Professions Education Centre (HPEC) offers ongoing staff development in the use of AI for education purposes, as well as online training and resources at the AI Faculty Hub: Link to VLE| AI Faculty Hub and Link to a Community of Practice;
- **RCSI AI Hub**: Central repository of AI Articles, videos, upskilling material that can be accessed by all staff as needed.

AI literacy and training

The provision of AI literacy training is a specific requirement of the EU AI Act (2024/1689). Mandatory training for all users (with annual refreshers) will cover capabilities, limitations, ethics, compliance, and evolving practices.

Due to the rapidly evolving nature of AI, all training content will require annual review to ensure it is in step with:

1. Regulations such as GDPR\EU AI Act
2. RCSI policies
3. Feedback from staff and learners

Where possible a "*train the trainer"/Super User* approach should be employed in order to build internal capacity and ensure consistent messaging, which will be shared through the AI Hub.

9. Governance and Oversight

This policy provides an RCSI-wide direction for meaningful and appropriate use of AI-based tools/approaches. The principles and recommendations outlined in this policy are therefore for RCSI-wide implementation.

The policy was developed by the RCSI AI Policy Development Working Group in Q2/3 2025. The ongoing governance, oversight, and policy review/enhancement will be managed by the AI and Digital Heath Committee which will report to the Senior Management Team (SMT). The

policy will be updated based on new advancements in AI approaches. As outlined in section 12 of this policy document, the effectiveness of the policy will be monitored through various sources such as academic integrity breach reports (which includes a specific question on AI-related breaches).

As this is an institution wide policy, updates will be approved by:

AI and Digital Health Ct
Senior Management Team
Academic Council
Medicine & Health Sciences Board (MHSB)
Surgery and Postgraduate Faculties Board (SPFB)
Council

Staff and learners found to be in breach of this policy may be subject to relevant disciplinary procedures as per Registry and HR conduct policies.

10. Accessibility and Equity

GenAI tools should be made available and accessible to all users to support and enhance their learning experience while ensuring fair and inclusive access and practices. Achieving fair and inclusive access requires recognising diverse needs and providing tailored supports to promote equity for all learners. This approach aligns with Irish legislation, international human rights standards, and best practices in third-level education in Ireland.

10.1 Legislative Environment

In developing and implementing this policy, RCSI is guided by relevant Irish legislation, including the EU AI Act, the Employment Equality Acts 1998-2015 and the Equal Status Acts 2000-2015, as well as adhering to Ireland's obligations under the United Nations Convention on the Rights of Persons with Disabilities and the Public Sector Duty under the Irish Human Rights and Equality Commission (IHREC). These legislative frameworks emphasise the importance of proactive measures to promote inclusion, prevent discrimination, and uphold the rights of all learners.

10.1.1 Equal access

This policy aims to protect all users of GenAI from direct or indirect discrimination. Our goal is to foster an environment that is free from discrimination while ensuring equity of access for all users of GenAI tools and resources.

RCSI commits to:

- Providing equitable access to GenAI tools and resources.
- Offering tailored supports and accommodations for learners with specific needs, in line with their individual learning needs and current legal obligations.

10.1.2 Universal design principles

Incorporating Universal Design (UD) principles into GenAI resource use ensures equitable access for all users, including those with disabilities, by supporting diverse learning needs through multiple means of engagement, representation, and expression. GenAI can enhance inclusivity and support the development of written communication skills, particularly for multi-language learners and individuals with disabilities. However, it is important to acknowledge that GenAI systems, built on Large Language Models (LLMs), may reflect biases present in their training data, potentially disadvantaging marginalised groups. Users must remain vigilant in identifying and mitigating such biases.

To promote fairness, all learners will have access to Microsoft Copilot, the institutionally approved GenAI tool, and staff should ensure its adequacy for assigned tasks to prevent inequities arising from the use of alternative tools. Additionally, learners with accommodations may receive support through interoperable assistive technologies, and staff are expected to guide learners to accessible resources. Continuous evaluation, feedback, and training will help refine these practices, while learners must embed ethical AI use in assessments, ensuring outputs uphold cultural sensitivity and patient-centred care.

11. Sustainability

The adoption and use of generative AI tools carries a significant environmental cost, with large-scale AI models requiring substantial energy and water resources for both training and operation. When evaluating or procuring AI solutions, departments and schools should consider these resource impacts alongside functional and financial factors. Where comparable tools exist, preference should be given to those with demonstrably lower environmental footprints, whether

through greater energy efficiency, the use of renewable energy sources, or more transparent sustainability reporting. Users should also be mindful of how frequency and scale of use contributes to cumulative resource consumption, and should avoid unnecessary or redundant AI processing where possible.

12. Monitoring and Evaluation

Monitoring and evaluating Gen-AI use by learners and staff is challenging, both technically and logistically. However, RCSI is committed to ensuring that these technologies are implemented effectively, ethically, and equitably. The emergence and expansion of AI in education and research is an evolving area which brings both opportunities and risks for all staff. Staff and learners found to be in breach of this policy may be subject to relevant disciplinary procedures as per Registry and HR conduct policies.

As described in section 8 of this policy document, the AI and Digital Health Committee will review this policy on a quarterly-basis and update as necessary to reflect the rapid pace of technological change. Finally, RCSI will share and learn from best practices and experiences with other higher education institutions and professional training bodies, both nationally and internationally, and with national bodies, such as QQI, to develop effective strategies for the management of Gen-AI use in third level education.

12. References

Addy, T. M., Dube, D., Mitchell, K. A., & SoRelle, M. (2023). *What inclusive instructors do: Principles and practices for excellence in college teaching*. Taylor & Francis.

ALLEA. (2023). The European Code of Conduct for Research Integrity. Revised edition. https://allea.org/code-of-conduct/

CAST. (2024). Universal Design for Learning Guidelines version 3.0. https://udlguidelines.cast.org

European Union. (2016). *Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (General Data Protection Regulation).* Official Journal of the European Union, L119, 1–88. https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32016R0679

European Union. (2024). *Regulation (EU) 2024/1689 of the European Parliament and of the Council of 13 June 2024 laying down harmonized rules on artificial intelligence (Artificial Intelligence Act).* Official Journal of the European Union, L168, 1–90. https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32024R1689

Foltynek, T., Bjelobaba, S., Glendinning, I., Khan, Z.R., Santos, R., Pavletic, P. and Kravjar, J. (2023). ENAI Recommendations on the ethical use of Artificial Intelligence in Education. International Journal for Educational Integrity, 19(1), p.12

Government of Ireland. (1998). *Employment Equality Act* https://www.irishstatutebook.ie/eli/1988/act/25/enacted/en/html

Government of Ireland. (2000). *Equal Status Act* https://www.irishstatutebook.ie/eli/2000/act/8/enacted/en/html

Government of Ireland. (2014). *Irish Human Rights and Equality Commission Act*

https://www.irishstatutebook.ie/eli/2014/act/25/enacted/en/html

Government of Ireland. (2015). *Equality (Miscellaneous Provisions) Act* https://www.irishstatutebook.ie/eli/2015/act/43/enacted/en/html

Government of Ireland. (2018). *Data Protection Act.* https://www.irishstatutebook.ie/eli/2018/act/7/enacted/en/html

Government of Ireland. (2019). *Ireland's National IP Protocol* https://eur-lex.europa.eu/legal-content/EN/ALL/?uri=COM%3A2018%3A237%3AFIN

National Research Integrity Forum. (2024). Policy Statement on Ensuring Research Integrity in Ireland (Revised ed.). Irish Universities Association. https://www.iua.ie/wp-content/uploads/2024/12/National-Policy-Statement-on-Ensuring-Research-Integrity-in-Ireland-Dec-2024.pdf

Quality and Qualifications Ireland. (2022). Assessment and standards, Revised. https://www.qqi.ie/sites/default/files/2022-09/assessment_and_standards-revised-2022.pdf

RCSI. (2024). Academic Integrity Policy. [Internal document]

RCSI Code of Research Conduct. [RCSI-Code-of-Research-Conduct.pdf].

RCSI. (2024). Intellectual Property Policy. [RCSI IP Policy 2024.pdf].

RCSI Procedure for the Investigation of Misconduct in Research. [RCSI-Procedure-for-the-Investigation-of-Misconduct-in-Research.pdf].

RCSI. 2024. Guidance on the Use of Generative AI in Learning, Teaching and Assessment. [Internal document].

RCSI. 2024. Ethical Guidance Framework for AI in Learning, Teaching and Assessment. [Internal document].

RCSI IT Security Policy [https://rcsicampus.sharepoint.com/sites/ITGuides/SitePages/IT-Policies-and-Procedures.aspx?csf=1&web…]

United Nations. (2006). *Convention on the Rights of Persons with Disabilities.* https://www.un.org/disabilities/documents/convention/convoptprot-e.pdf

RCSI Generative AI Policy – At-a-Glance Checklist

Use Only Approved Tools

- **Microsoft Copilot** is the preferred tool for all RCSI-related AI activity.
- Using AI tool other than Copilot? Check it meets policy requirements before inputting any RCSI data.

Protect Data & Confidentiality

- **Do NOT upload:** personal data, health data, research data, learner work, confidential emails, contracts, or IP.
- Never input passwords or sensitive organisational information.

Maintain Academic & Research Integrity

- AI may **support**, not replace, original work.
- **Never submit AI-generated content as your own.**
- Cite/acknowledge AI use when required.
- Do not use AI to generate or manipulate research data.

Check for Accuracy, Bias, and Fairness

- Always **verify** AI outputs.
- Be alert for bias, stereotyping, or fabricated information.

Follow RCSI Rules & Oversight

- Follow module/assessment-specific AI guidance.
- For research, disclose AI use and comply with ethics approval.
- Report concerns to **itsecurity@rcsi.ie** or **dataprotection@rcsi.ie**.

If Unsure

- When in doubt, **don't input it**.
- Ask a module lead, supervisor, or manager.