



Title: Artificial Intelligence Governance and Oversight Policy

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Gulf University adheres to all laws, regulations, resolutions, and instructions issued by the Higher Education Council and to all applicable national regulatory frameworks in the Kingdom of Bahrain.

1. Purpose

The purpose of this policy is to establish a comprehensive, risk-based governance framework for the adoption, oversight, and accountability of Artificial Intelligence (AI) systems across all functions of Gulf University.

2. Scope

This document applies to :

- All academic colleges, administrative units, research council, and support services of Gulf University.
- All AI systems, tools, platforms, and applications procured, developed, deployed, or used by the University — including but not limited to generative AI, machine learning systems, predictive analytics, natural language processing tools, and AI-driven decision-support systems.
- All faculty, staff, researchers, administrators, contractors, vendors, and students operating within the institutional domain of Gulf University.

3. Acronyms

GU	Gulf University
AI	Artificial Intelligence
BQA	Education and Training Quality Authority
DTC	Digital Transformation Center
BCC	Business Continuity Committee
LMS	Learning Management System
HOD	Head of Department
IT	Information Technology
DPA	Data Processing Agreement

4. Definitions

Artificial Intelligence (AI):

Artificial Intelligence refers to computer systems or software capable of performing tasks that typically require human intelligence, including but not limited to generative AI, machine learning models, and automated decision-making systems.

AI Governance:

The institutional framework of policies, procedures, roles, controls, and accountability structures that collectively ensure AI systems are adopted and operated responsibly, ethically, and in compliance with applicable laws and standards.

Human Oversight:

The requirement that consequential decisions informed or generated by AI systems must be reviewed, verified, and ultimately authorized by a qualified human being prior to implementation.

AI Procurement:

The process by which Gulf University evaluates, approves, acquires, and contracts AI tools, platforms, or services from third-party vendors or open-source providers.

Algorithm:

A defined computational process through which an AI system processes inputs and produces outputs, predictions, or decisions.

Bias (Algorithmic):

Systematic and unjustified variation in AI-generated outputs that disadvantages individuals or groups on the basis of personal characteristics such as nationality, gender, religion, or socioeconomic background.

Explainability:

The degree to which the rationale behind an AI system's output, recommendation, or decision can be understood and communicated in human-intelligible terms.

5. Policy Statement

Gulf University is committed to harnessing the potential of Artificial Intelligence to advance its academic mission, institutional effectiveness, and service to the Kingdom of Bahrain — while maintaining absolute accountability for outcomes that affect students, staff, and the broader community. AI systems shall never be adopted without prior institutional authorization, risk assessment, and defined human oversight protocols.

6. Policy principles

- 6.1 All AI use within Gulf University shall be governed by this policy and its associated procedures, without exception.
- 6.2 No AI system shall make final, binding decisions affecting student academic standing, staff employment, or institutional compliance without human review and authorization.
- 6.3 AI systems that cannot be adequately explained, audited, or corrected shall not be deployed at Gulf University.
- 6.4 AI governance is a shared institutional responsibility, led by the Digital Transformation Center and the Business Continuity Committee, accountable to the Board of Trustees.

7. Policy details:

7.1 AI Governance at GU encompasses:

- **Generative AI:** Tools that create new content (text, images, code, audio) based on patterns learned from existing data.
- **Machine Learning & Predictive Analytics:** Systems designed to analyze data, recognize patterns, and solve problems.
- **Decision-Support Systems:** Automated tools that assist in administrative or academic processes.
- **Natural Language Processing:** Technologies that understand and generate human language.

7.2 GU AI Principles

Gulf University commits to the following principles to maximize the benefits of AI while mitigating associated risks:

- **Principle 1: Ethical Use and Integrity**
All AI applications must uphold ethical standards, ensuring fairness, accountability, and the protection of academic integrity in education and research.
- **Principle 2: Human Oversight**
AI systems shall support, not replace, human judgment. Consequential decisions affecting students or staff must always be reviewed and authorized by a qualified human.
- **Principle 3: Transparency and Explainability**
The use of AI must be clear and transparent. Users should understand when and how AI is being deployed and whether their data is being utilized.
- **Principle 4: Compliance and Data Protection**
AI-related activities must comply with applicable national laws (including Bahrain's Personal Data Protection Law) and University policies on data security and privacy.
- **Principle 5: Inclusivity and Equity**
The deployment of AI should prioritize accessibility and actively monitor for and mitigate algorithmic bias to ensure equitable outcomes.
- **Principle 6: Continuous Innovation**
The University encourages the responsible use of AI to drive innovation in teaching, learning, research, and administrative efficiency.

7.3 AI Governance in Practice

In practice, these principles require that:

- **Academic Rigor:** Faculty and students are empowered to use AI tools creatively, provided their use is transparently acknowledged and does not compromise academic integrity. Students must disclose AI tool use in academic work as required by applicable policies.
- **Data Security:** University-sensitive data must never be uploaded to unapproved, public generative AI systems. All AI tools processing institutional data must be approved by the Digital Transformation Center.

- **Procurement and Deployment:** Any acquisition or deployment of new AI tools must be evaluated for security, privacy, and ethical risks before implementation. Free or open-source AI tools accessed for institutional purposes require the same registration and risk assessment as commercial procurements.
- **Accountability:** Every AI system provided by the university, with decision-making capability must have a designated staff member (Responsible Officer) accountable for its operation and output.
- **Transparency:** Staff and students must be informed when AI has been used to inform decisions that affect them directly and must have the right to request a human review of such decisions.

7.4 Monitoring and Risk Mitigation

GU ensures to monitor its AI approach through existing institutional structures and agility:

- **Continuous Review:** The Digital Transformation Center shall regularly evaluate AI technologies, tools, and their impact on University operations.
- **Risk Assessment:** The Business Continuity Committee shall incorporate AI-related risks into the University's broader risk management and audit frameworks, ensuring institutional risks are identified and mitigated.
- **Annual Reporting:** The Digital Transformation Center shall publish an annual report on AI governance, including registrations, incidents, audits, and policy developments, for review by the University Council and Board of Trustees.

7.5 GU AI Ethics

All AI systems at Gulf University shall be designed, procured, and operated in accordance with the following ethical principles, aligned with UNESCO, OECD, and Bahrain's national AI framework:

- **Human Centeredness:** AI shall serve human wellbeing. The interests, rights, and dignity of students, staff, and the community shall take precedence over efficiency gains or technological capability.
- **Transparency:** Gulf University should be open about which AI systems are in use, what data they process, how they influence decisions, and what safeguards are in place.
- **Accountability:** Every AI system shall have a named Responsible Officer accountable for its ethical operation. The University Council bears collective institutional accountability.
- **Non-Maleficence:** AI systems shall not be deployed where they are reasonably expected to cause harm — whether physical, psychological, reputational, academic, or financial — to individuals or communities.
- **Beneficence:** AI deployment shall generate demonstrable benefits to students, staff, or the academic community. Deployment for its own sake is insufficient justification.

- **Fairness and Non-Discrimination:** AI systems shall be evaluated for bias prior to deployment and monitored continuously. Discriminatory outcomes shall be investigated and remediated.
- **Sustainability:** AI systems shall be evaluated for their environmental footprint, and Gulf University shall prefer energy-efficient AI solutions where available.

Prohibited AI Applications

The following AI applications are explicitly prohibited at Gulf University, without exception:

- Facial recognition or biometric surveillance of students or staff in academic spaces without explicit, informed, and freely given consent, and without a compelling security justification.
- AI systems that generate or amplify content that is defamatory, discriminatory, or harmful to identifiable individuals or groups.
- AI-powered social scoring, sentiment analysis of student political views, or monitoring of lawful personal communications.
- Fully automated academic progression, exclusion, or degree award decisions without human review and authorization.
- AI tools used to impersonate faculty, University officials, or academic advisory services without disclosure.
- AI systems whose training data or operational parameters are legally contested on intellectual property or privacy grounds, and for which adequate legal clearance has not been obtained.

8. Responsibilities

Academic and Administrative Staff are responsible for:

- Following this document appropriately

Board of Trustees is responsible for:

- Approve the AI Governance Policy and any substantive amendments.
- Receive the Annual AI Governance Report from the University Council.

University Council is responsible for:

- Review and recommend this policy for BOT approval.
- Receive and act on the Annual AI Governance Report.

Vice President for Academic Affairs is responsible for:

- Serve as the primary custodian and owner of this policy.
- Ensure faculty, staff, and students are trained on AI governance requirements.

Head of Information Technology is responsible for:

- Maintain the University AI Systems Register.
- Conduct technical risk assessments for all AI system applications.
- Ensure IT infrastructure supports safe AI deployment.

Deans and Heads of Departments is responsible for:

- Ensure compliance with this policy within their college or department.
- Designate AI Leads within their units.
- Report AI governance incidents within five (5) working days.

Faculty and Staff is responsible for:

- Use only institutionally approved AI systems.
- Complete mandatory AI governance training.
- Report AI-related concerns or incidents to their Dean or Head of Department.

Students is responsible for:

- Comply with this policy and all associated AI use guidelines.
- Complete mandatory AI literacy orientation.
- Disclose AI tool use in academic work as required by applicable policies.

8. Related Policies

- AI in Assessment and Academic Integrity Policy
- AI Data Protection and Privacy Policy
- AI in Teaching and Learning Policy
- AI Ethics, and Research Integrity Policy
- Information Technology Policy

9. Related Procedures

- AI in Assessment and Academic Integrity Procedures
- AI Data Protection and Privacy Procedures
- AI in Teaching and Learning Procedures
- AI Ethics, and Research Integrity Procedures
- Information Security Procedures

10. Related References and Standards

- UNESCO Recommendation on the Ethics of AI (2021)
- OECD Principles on AI (2019, updated 2024)

- QAA (UK) Guidance on AI in Higher Education (2023/2024)
- Bahrain Personal Data Protection Law No. 30 of 2018 (PDPL)
- Bahrain National AI Strategy — Vision 2030
- BQA Institutional Review Handbook
- HEC Academic Regulations and Resolutions
- National Qualifications Framework (NQF) Handbook — BQA