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Governing Generative AI in Higher Education: A Global Delphi Study on Policy and Practice

This white paper provides a summary of the work from:

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Research Author Bios:

Dr. Helen Crompton is a Professor of Instructional Technology in the Department of STEM and Professional Studies and the Executive Director of the Research Institute for Digital Innovation in Learning at ODU. Dr. Diane Burke is a Senior Research Associate at the Research Institute for Digital Innovation in Learning at ODU. Dr. Christine Nickel is a Senior Instructional Designer for the Division of Digital Transformation & Technology at ODU. Please see details of the other 32 authors in the full paper.

Overview

As GenAI technologies become more pervasive, institutional policies are essential to uphold academic integrity, support pedagogical coherence, promote equity, protect student rights, and prepare graduates for the GenAI-integrated future. This study develops a framework to address these issues through a cohesive strategy.

Purpose of Research

The purpose of this study was to identify the core components of effective GenAI governance in HE. The overarching research question was: What policies and/or guidelines should be developed in HE education to ensure the responsible and effective use of generative AI (GenAI) in learning experiences? The sub-questions identified which approach is most suitable: formal policies, flexible guidelines, or a combination of both; what core topics the guidelines should cover; and what processes could help keep them current as GenAI technologies and uses evolve.

Method

This study used the Delphi technique and qualitative data analysis with grounded coding and collective writing. Together, these approaches combined structured consensus-building with dialogic co-authorship, aligning with contemporary participatory research methodologies in educational technology. Purposive sampling identified and recruited a panel of international experts. Participants were selected based on their expertise in HE educational technology and AI, as evidenced by their scholarly contributions, professional experience in HE contexts, and/or leadership roles in relevant professional organizations. A total of 35 participants agreed to participate in all three phases of the study, providing expert perspectives from 22 countries/locations across six continents.

Findings and Discussion

Best Approaches for GenAI Implementation in HE Education

The majority of panelists (88%) indicated that effective GenAI implementation in HE requires a combination of formal policies and flexible guidelines, rather than prioritizing one form of governance, suggesting that GenAI governance requires a balance between institutional regulation and adaptive flexibility. Within this framework, formal policies can provide the structural foundation, and guidelines can function as operational tools that help faculty and students interpret how these expectations apply in specific disciplinary and pedagogical contexts.

Core Themes in the Governance Framework

The findings yielded a governance framework comprising eight core themes (See Figure 1). Academic integrity emerged as a main concern and was the most frequently cited theme in the study. The panel identified a broad commitment to ethical and responsible use as a distinct foundational principle. Data privacy and protection emerged as a critical governance theme. Over half the panel (55%) explicitly raised privacy or data security. Another prominent theme was equitable access. Panelists voiced concern that without deliberate action, GenAI could exacerbate digital divides or create new inequities. A strong agreement emerged around the need for GenAI literacy as part of GenAI governance. Panelists widely agreed that education should focus on how generative GenAI works, its appropriate uses, and limitations. Another theme was integrating GenAI into teaching and learning across disciplines while maximizing educational benefits and minimizing negative impacts. Additionally, panelists strongly agreed that human oversight must remain central in any use of GenAI for academic decisions or evaluative processes. The final theme the panel identified serves as the foundational enabler for the entire governance framework: robust institutional support and infrastructure. Policy documents alone will accomplish little unless universities invest in the technologies, resources, and organizational structures needed to implement them.

Figure 1: GenAI Policies and Guidelines for Higher Education



In addition to identifying the core themes, this study provided specific policy and guideline elements for each theme, as detailed in Table 1.

Table 1

Higher Education Policies and Guidelines for Gen AI Use

Core Area	Policy Elements	Guideline Elements
1. Academic Integrity	Codify what constitutes academic misconduct at the institution related to GenAI and outline enforceable consequences.	Provide clear communication and transparency about how GenAI should be used in each course and research projects. Educate about what constitutes GenAI-related academic misconduct and provide examples.
2. Ethical and Responsible Use	Set enforceable standards for ethical conduct and define institutional expectations.	Help recognize ethical dilemmas in GenAI use and offer strategies for responsible engagement. Provide case studies/scenarios/ examples of what is or is not acceptable use of GenAI in different contexts. Encourage critical thinking about the implications of GenAI, including its societal impact and limitations.
3. Privacy and Data Protection	Regulate what data can be shared with GenAI technologies, aligning institutional practices with data protection laws.	Provide instruction on safe practices for using GenAI (e.g., anonymizing inputs, tool selection). Offer guidelines for compliance with data protection laws, standards for securing data inputs and outputs, and guidelines to prevent exposure of confidential information during GenAI interactions.
4. Equitable access	Where possible ensure equitable access to Gen AI technologies and integration into institutional diversity and inclusion commitments.	Provide equitable access to key GenAI-enhanced learning technologies and GenAI literacy training for all. Recommend GenAI technologies that enhance learning for diverse student needs, including those with disabilities, to support inclusive education.
5. GenAI Literacy	Establish expectations for GenAI competency and require GenAI literacy training programs. Create a GenAI literacy graduation outcome.	Provide training, tutorials, and examples for using GenAI effectively and responsibly in learning and research contexts. Help students gain critical GenAI literacy skills to navigate, evaluate, and create digital content responsibly, ensuring safe, ethical, and effective use of technology. This includes

Core Area	Policy Elements	Guideline Elements
		competencies in communication, information handling, problem-solving, and protecting personal and societal well-being in digital environments.
6. Integration Strategy	Ensure GenAI is used to facilitate and/or support, not replace; promote learning; support innovation aligned with pedagogy. Maintain currency regarding workforce GenAI requirements.	Provide opportunities to use GenAI to increase critical thinking. Create learning experiences that model the use of GenAI in students' future workplaces. Encourage assessments that test deeper learning and critical thinking, reducing over-reliance on GenAI-generated responses. Consider the design of new learning spaces.
7. Human Oversight & Accountability	Require human review of GenAI-generated outputs that impact learning or student evaluation. Assign clear accountability for GenAI decisions.	Promote thoughtful integration of GenAI to enhance students' critical thinking and support meaningful, authentic learning experiences. Avoid outsourcing educational governance to GenAI-driven analytics or administrative decision-making technologies without clear human oversight. Communicate with all AI-related student monitoring and analytics, allow for opt-out.
8. Institutional Support and Infrastructure	Institutionalize commitments to maintain infrastructure and endorse approved GenAI technologies.	Recommend technologies, provide support links, and explain how to access approved GenAI platforms. Create a continuous review process to refine and improve GenAI applications in learning and research.

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Processes to Ensure Policies and Guidelines Stay Current

The study identified six key processes (See Figure 2) to ensure GenAI policies and guidelines remain current and relevant in HE settings. The findings emphasized several mechanisms for keeping GenAI policies current and effective. Institutions should establish a dedicated GenAI governance committee or task force to oversee policy development and revision and implement scheduled review cycles to maintain relevance. Ongoing professional development was viewed as essential to help faculty stay current with GenAI developments, alongside transparent communication with stakeholders as policies evolve. The study also recommended regularly evaluating GenAI's impact on learning and academic integrity to ensure policies

remain effective. Finally, institutions should monitor external developments so that their GenAI policies continue to reflect emerging technologies, practices, and concerns.

Figure 2: Processes to Ensure Policies and Guidelines Stay Current



In addition to identifying the key processes for keeping GenAI policies and guidelines current, this study provided specific recommendations and guidance on how to update them, as detailed in Table 2.

Table 2

Six Process Recommendations for Keeping GenAI Policies and Guidelines Current

Recommendation	Description
1. Create a dedicated GenAI Committee	Create a multidisciplinary group representing all stakeholders to ensure that different perspectives are considered, including faculty, administrators, parents/caregivers, and students. This group would be responsible for the overall policy, including its development, implementation, management, and review.
2. Conduct regularly scheduled policy reviews	Implement a regular review cycle to assess GenAI policies and guidelines, adapting to new developments and emerging challenges.
3. Provide ongoing professional development and support	Provide regular professional development to keep faculty and staff informed about emerging GenAI technologies and promote GenAI literacy.

Recommendation	Description
4. Communicate with all stakeholders	Share updates on the most important facets of GenAI as well as current research.
5. Evaluate effectiveness and impact of GenAI	Regularly evaluate GenAI's impact on student learning, academic integrity, and research quality to refine policies accordingly.
6. Monitor external developments	Invest in ongoing research and partnerships with GenAI developers, tech companies, and academic institutions. Stay informed about changes in laws, data privacy standards, industry standards, and new GenAI research or applications.

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While the study included data from 22 countries, it notes that these findings should be used with local contexts in mind.

Conclusion

This study synthesizes current trends in GenAI policy development, revealing a growing consensus around context-specific, adaptable guidance. The study outlines eight key topic areas that form the foundation of any GenAI policy framework. These are academic integrity, ethical and responsible use, privacy and data protection, equitable access, GenAI literacy, integration strategy, human oversight and accountability, and institutional support and infrastructure. It also proposes a six-part procedural model to keep policies current and relevant.

References:

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