



# **Generative Artificial Intelligence (AI) Acceptable Use and Data Protection Policy**

Author: Emmanuel College Information Technology Department

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## **Purpose**

Emmanuel College increasingly encounters generative artificial intelligence (AI) tools across teaching, learning, research, administration, and student support activities. While these technologies present opportunities for innovation and efficiency, they also introduce risks related to data privacy, regulatory compliance, academic integrity, and institutional trust.

The purpose of this policy is to:

- Establish clear expectations for the appropriate institutional use of generative AI tools
- Protect student, employee, alumni, donor, and constituent data
- Ensure compliance with applicable federal, state, and contractual obligations
- Align institutional practice with recognized higher-education guidance and risk management frameworks, including NIST, EDUCAUSE, and Massachusetts data protection requirements

This policy is intended to support responsible exploration of AI technologies without compromising the institution's legal, ethical, or educational obligations.

## **Scope**

This policy applies to all faculty, staff, administrators, contractors, consultants, student employees, and volunteers who use generative AI tools in connection with college business, academic operations, or administrative functions.

This includes, but is not limited to, AI use related to:

- Instructional preparation and course administration
- Academic advising, student success, and enrollment services
- Research administration and operational support
- Finance, human resources, advancement, and alumni relations
- Information technology, communications, and institutional reporting

Separate policies, academic integrity guidelines, or research governance frameworks may apply to student coursework, scholarly research, or externally sponsored research activities.

## Policy

Faculty and staff must not enter, upload, transmit, or otherwise provide confidential, sensitive, or regulated Emmanuel College data to any generative AI system unless that system has been:

- Explicitly approved by the college
- Reviewed for compliance with applicable legal, regulatory, and college requirements.

This policy reflects a risk-based governance approach aligned with higher education guidance and regulatory expectations applicable to Emmanuel College, recognizing that colleges and universities routinely manage regulated data across decentralized academic and administrative environments.

Currently, Emmanuel College has not approved any generative AI platforms for use with regulated or sensitive college or personal information.

## Prohibited Data Types

Consistent with higher-education regulatory obligations and Massachusetts data security requirements, the following data must not be used with generative AI tools unless explicitly approved:

- Personally Identifiable Information (PII) of students, employees, alumni, donors, or applicants
- Non-Public Information (NPI) subject to the Gramm-Leach-Bliley Act (GLBA), including financial aid and student financial services data
- Student education records protected under the Family Educational Rights and Privacy Act (FERPA)
- Protected health information (PHI) governed by the Health Insurance Portability and Accountability Act (HIPAA), including student health and counseling records
- Human resources and employment records
- Any other confidential or institutionally restricted data, as defined by institutional data classification standards

Emmanuel College is responsible for safeguarding these data types across teaching, administrative, and support functions, including when third-party technologies are used.

## Use of Public and Consumer AI Tools

Public or consumer-facing generative AI services - including tools such as ChatGPT, Microsoft Copilot, Claude, and similar platforms - are not approved for the storage, processing, or analysis of confidential college data.

In a higher-education context, these tools:

- Are not governed by institutional contracts or data-handling agreements
- May retain or reuse submitted content outside institutional control

- May conflict with FERPA, GLBA, HIPAA, or Massachusetts data security obligations

## Faculty and Staff Responsibilities

Before using any generative AI tool for institutional work, faculty and staff are responsible for ensuring that:

- No protected, confidential, or non-public institutional information is included in prompts or uploads
- The intended use aligns with institutional policies and regulatory requirements
- Appropriate consultation occurs when the classification or permissibility of data is unclear

When uncertainty exists, users must consult:

- The IT Department
- The appropriate functional data steward, such as:
  - Registrar (FERPA and student records)
  - Health Services or Counseling Services (HIPAA)
  - Business Office or Student Financial Services (GLBA/NPI)
  - Human Resources (employee data)

This shared-responsibility model reflects established higher-education governance practices, where data ownership is distributed across functional and academic units.

## Institutional Governance and Risk Management

The institution's approach to generative AI governance is informed by:

- EDUCAUSE higher-education guidance on AI policy development, data governance, and institutional oversight
- Massachusetts 201 CMR 17.00, requiring administrative, technical, and physical safeguards for personal information

Emmanuel College Information Technology, in collaboration with academic leadership and functional data stewards, is responsible for:

- Advising on acceptable technologies and institutional use cases
- Evaluating generative AI platforms for potential future approval
- Supporting risk assessments, governance reviews, and policy updates as AI capabilities evolve

## Enforcement

Failure to comply with this policy may result in disciplinary action under college policies and may expose the institution and individuals to legal, regulatory, or reputational risk.

## Review and Revision



Future revisions to this policy will involve Emmanuel College Information Technology in coordination with academic leadership, the Registrar, Human Resources, and other functional data stewards as appropriate.

Version	Approved Date	Notable Changes
#1.0	5/1/2026	First approved version
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