

UNIVERSITY ON THE NIGER, UMUNYA

Artificial Intelligence (AI) Policy

Abstract

Artificial intelligence (AI) is a rapidly evolving technology that is increasingly being used across science, technology, engineering, medicine, law, management and the humanities. Its development and adoption in the academic community, however, are hampered by challenges such as limited resources, technical constraints and a shortage of expertise. The objective of this project is to draft an Artificial Intelligence Policy for the University on the Niger (UNINIGER), Umunya, for approval by Senate and Council. The policy is aligned with United Nations General Assembly Resolution A/RES/78/265 (March 2024) on seizing the opportunities of “safe, secure and trustworthy” AI systems for sustainable development, with Nigeria’s National Artificial Intelligence Strategy (2025) and with the Nigeria Data Protection Act 2023. The paper also provides an overview of the strengths, weaknesses, opportunities and threats (SWOT) related to the implementation of AI at the University, recognising that a systematic approach and genuine stakeholder engagement are crucial for policy outcomes that address issues effectively while minimising unintended consequences.

The development and implementation of the draft policy involve initiation, research, drafting, review, approval, implementation and monitoring. Initiation begins with identifying the need for a new policy or a revision. Research gathers relevant information, and drafting produces a preliminary policy. Review and revision incorporate feedback from stakeholders, experts and legal advisers. Once finalised, the policy is approved by Senate and ratified by the University Council. The draft policy provides a framework for incorporating ethical considerations into the use of AI in teaching, research, clinical training, community service and quality assurance at the University on the Niger, fostering a culture of responsible AI innovation and governance that is consistent with the University’s Christian foundation.

Introduction

The University on the Niger is a private, faith-based university founded by the Anglican Diocese on the Niger. It grows out of the educational heritage of the Church Missionary Society’s Niger Mission, which, from 1857 under Bishop Samuel Ajayi Crowther and the Rev. J. C. Taylor, combined evangelism with schools and health institutions in Igbo land. The University commenced academic activities in the 2023/2024 session following approval by the National Universities Commission (NUC). It operates from campuses at Umunya, Iyi-Enu and Onitsha, with the Iyi-Enu Mission Hospital serving as its teaching

hospital. Its Chancellor is the Rt. Rev. Dr. Owen Chiedozie Nwokolo, Bishop on the Niger, and its pioneer Vice-Chancellor is the Very Rev. Prof. Chinedu Nebo.

The **philosophy** of the University is “*to provide, promote and enhance qualitative education with godliness in Nigeria.*” Its **vision** is “*to be a leading tertiary institution in the achievement of excellence in knowledge dissemination,*” and its **mission** is “*to develop the moral, spiritual and academic life of young people.*” The University’s motto, *Lux Fiat Via Sapientia* (“Show the Light through Wisdom and Knowledge”), captures this purpose.

The University describes itself as faith-based and entrepreneurial, placing a premium on character. Its aim is to form graduates who create value rather than merely add to the job-seekers’ market. The University currently runs programmes in six faculties: Medicine and Dentistry; Allied Health Sciences; Pharmaceutical Sciences; Law; Arts, Management and Social Sciences; and Science and Computing. These include Medicine and Surgery, Dentistry, Nursing, Pharmacy, Law, Accounting, Psychology, Economics and Development Studies, Religious Studies, Computer Science, Cyber Security, Software Engineering, Forensic Science and Microbiology.

The University is a place that fosters study and a permanent search for truth. This involves the labour of the intellect, intellectual honesty and the desire to learn, combined with a commitment to moral and spiritual growth. These values bear directly on how AI should be used. AI must serve learning and never replace the honest intellectual effort and integrity that the University seeks to form in its students and staff.

The objective of this project is to draft an Artificial Intelligence Policy for the University on the Niger for Senate and Council approval, in line with the United Nations resolution on the responsible use of AI for sustainable development for all and focused on the promotion of “safe, secure and trustworthy” AI systems.

Artificial Intelligence: Definition, History and Current Development

Artificial intelligence (AI) refers to the simulation of human intelligence processes by machines, particularly computer systems. These processes include learning (the acquisition of information and rules for using the information), reasoning (using rules to reach approximate or definite conclusions) and self-correction.

The ideas behind AI date back to antiquity, but modern AI emerged in the mid-20th century. The term “artificial intelligence” was coined in 1956 at the Dartmouth Conference. Early AI focused on symbolic reasoning and rule-based systems. Periods of disillusionment, known as “AI winters,” followed in the 1970s and late 1980s. Since the late 1990s, advances in machine learning, neural networks and computational power have fuelled rapid progress. Since 2022, generative AI tools such as large language

models (e.g., ChatGPT, Claude, Gemini) have become widely available to students and staff, which has made institutional guidance on their use urgent.

AI operates on several key concepts, including machine learning, neural networks, natural language processing, computer vision and robotics. Machine learning algorithms enable computers to learn from data and make predictions or decisions without being explicitly programmed. Neural networks are computational models inspired by the structure and function of the human brain and are capable of learning complex patterns from data. Natural language processing enables computers to understand, interpret and generate human language. Computer vision allows machines to perceive and interpret images and video, with important applications in medical imaging, radiography and forensic science. Robotics combines AI with mechanical engineering to create intelligent machines capable of performing tasks autonomously.

Africa has shown growing interest in AI development and adoption, although progress varies across countries. Nigeria, one of Africa's largest economies, has seen increased AI activity, particularly in finance, healthcare, agriculture and education. Start-ups and research institutions are driving AI innovation, focusing on applications such as predictive analytics, chatbots and image recognition. In 2025 the Federal Ministry of Communications, Innovation and Digital Economy, through NITDA and the National Centre for Artificial Intelligence and Robotics (NCAIR), released Nigeria's National Artificial Intelligence Strategy. However, limited infrastructure, funding and expertise remain significant barriers to widespread adoption.

In the Government AI Readiness Index 2025 published by Oxford Insights, Nigeria ranked 72nd of 195 governments globally and fourth in sub-Saharan Africa, behind Kenya, South Africa and Mauritius. The 2025 index assesses readiness across six pillars, namely policy capacity, governance, AI infrastructure, public-sector adoption, development and diffusion, and resilience, using 69 indicators.

At the University on the Niger, AI is at an early but strategic stage. The University lists Artificial Intelligence among its academic departments, and its Faculty of Science and Computing offers Computer Science, Cyber Security and Software Engineering, which provide a natural base for AI teaching and research. The University also operates an e-library and an online learning management system. Its strong health-sciences profile, anchored by the Iyi-Enu Mission Teaching Hospital, offers significant scope for applied AI in medical imaging, diagnostics, health information management and public health. Because the University is young, it has the rare opportunity to embed responsible AI governance into its systems and curricula from the outset rather than retrofitting it later.

SWOT Analysis of AI Implementation at the University on the Niger

The strengths, weaknesses, opportunities and threats (SWOT) related to the implementation of AI at the University on the Niger are summarised below.

Strengths: The University has a clear Christian and moral mission that provides a natural ethical anchor for responsible AI use. It inherits the long educational heritage of the CMS Niger Mission and the Anglican Diocese on the Niger. Its leadership brings deep experience in university administration and engineering; the Vice-Chancellor is a former Vice-Chancellor of the University of Nigeria, Nsukka, and a former Minister of Power. It has a dedicated Artificial Intelligence department and computing programmes (Computer Science, Cyber Security, Software Engineering). It has a teaching hospital and a strong cluster of health programmes that can generate high-value, real-world AI use cases. It already has an e-library and a learning management system. Finally, as a new institution it can design digital, AI-ready processes from the start.

Weaknesses: As a young institution, the University has a small pool of academic staff with practical AI expertise and a limited research track record so far. It faces resource and funding constraints and the infrastructure challenges common in the region, notably unstable power and internet services. Access to computing resources and high-quality, locally relevant datasets is limited. Coordination across three campuses (Umunya, Iyi-Enu and Onitsha) adds complexity. Together, these may hinder the scalability and effectiveness of AI projects.

Opportunities: The National AI Strategy and national programmes run by NITDA and NCAIR create openings for funding, training and partnerships. Proximity to Onitsha, one of West Africa's largest commercial hubs, favours industry collaboration on AI for trade, logistics and small-business development, in line with the University's entrepreneurial ethos. AI can personalise student learning, support clinical and laboratory training, and improve operational processes through data-driven decision-making. Processes that are still manual can be digitised early, leading to optimal performance. Partnerships and mentorship arrangements with established universities and the Anglican Communion's global network of institutions can accelerate capacity building.

Threats: The difficult economic situation and its impact on household incomes may adversely affect applications and enrolment. Competition from established public and private universities in the South-East and beyond may limit the University's ability to attract top talent and funding. The emigration of skilled professionals ("brain drain") affects both AI and health-sciences staffing. Generative AI poses serious risks to academic integrity if not properly governed. The handling of sensitive personal and health data creates legal and reputational exposure under the Nigeria Data Protection Act 2023. Finally, the fast pace of technological change requires constant adaptation and learning to keep up with the latest tools and techniques.

Methodology for the Development of the AI Policy

The following ten-step process is proposed as the methodology for developing the AI policy of the University on the Niger.

Step 1: Drawing from the University's philosophy, vision, mission and Christian values, sensitisation seminars and workshops on AI will be conducted for academic and non-academic staff and for student leaders. These will be held at faculty, department and unit levels across the Umunya, Iyi-Enu and Onitsha campuses.

Step 2: Senate will set up an AI Policy Drafting Committee with members drawn from all faculties, the University Library, the ICT unit, the Registry, the Legal Unit, the Chaplaincy and the Iyi-Enu Mission Teaching Hospital. It will also include representatives of non-teaching staff and students, and some external members, such as private-sector professionals with AI expertise. A steering committee of senior management and an AI ethics expert will then be appointed to guide the process and decision-making.

Step 3: Identify all stakeholders involved in AI implementation at the University. These include academic staff, students, clinicians, administrators, ICT personnel, legal experts, the Proprietor (the Diocese on the Niger) and external partners. The Committee will invite them to submit inputs describing their concerns, expectations and potential use cases for AI within the University.

Step 4: The Committee collates and synthesises all inputs. It will map the current landscape and review existing laws, regulations and guidelines related to AI in education, research and healthcare. These include the Nigeria Data Protection Act 2023, the National AI Strategy, NUC requirements, guidance from professional regulators such as the Medical and Dental Council of Nigeria, the Pharmacists Council of Nigeria and the Council of Legal Education, and international guidance from UNESCO. The Committee will then identify gaps between current practices and desired ethical standards, legal requirements and best practices in AI governance. Finally, it will develop a policy framework that sets out principles, guidelines and procedures for AI development, deployment and use, covering ethics, data privacy and security, transparency and explainability, accountability and oversight, and collaboration and partnerships.

Step 5: The zero draft is shared with Deans for Faculty Board input and circulated among stakeholders for feedback. Relevant suggestions and concerns are incorporated.

Step 6: The draft is revised based on inputs from Faculty Boards, the Teaching Hospital, directorates and units.

Step 7: The AI Policy Drafting Committee submits the draft to Senate.

Step 8: Senate reviews and approves the draft and establishes mechanisms for implementing and enforcing the policy across the University.

Step 9: The University Council ratifies the policy for use in the University on the Niger.

Step 10: The implementation of the AI policy is monitored regularly and its effectiveness evaluated. The policy is updated as needed to address emerging issues, technological advances and changes in regulation. A culture of continuous improvement is fostered by encouraging feedback, conducting periodic reviews and keeping abreast of developments in AI governance. Training sessions and awareness programmes are provided to educate staff and students about the policy, their roles and responsibilities, and the importance of ethical AI use.

Proposed Contents of the Draft AI Policy

The draft policy provides a framework for incorporating ethical considerations into the use of AI in teaching, research, clinical training, community engagement and quality assurance at the University on the Niger. It is guided by the University's commitment to qualitative education with godliness and to the formation of the moral, spiritual and academic life of young people.

a. AI Use in Teaching and Learning

AI in teaching should enhance learning outcomes while upholding ethical principles and respecting the dignity and rights of students. Students, academic staff and the tools they use should meet the following expectations:

- Lecturers should be transparent about the use of AI in course materials, assessments and grading processes, including any automated decision-making systems.
- Each course outline should state clearly whether, and how, generative AI tools may be used for assignments, projects and examinations. Undisclosed use of AI where it is not permitted constitutes academic misconduct.
- Students must be informed about the use of AI in their learning and, where available, have the option to opt out of AI-driven assessments.
- AI tools can be used to personalise learning, provide targeted feedback and automate administrative tasks through the University's learning management system. AI-driven educational content should be reviewed regularly for accuracy, relevance and alignment with learning objectives. AI tools used in teaching should promote inclusive learning and accessibility for all students. AI-generated content should be clearly identified to avoid plagiarism.
- In professional programmes (Medicine, Dentistry, Nursing, Pharmacy, Allied Health and Law), AI may support learning but must not replace the hands-on clinical, laboratory and advocacy skills, or the professional judgement, required by the relevant regulatory bodies.

b. AI Use in Research

Research involving AI should be conducted ethically, respecting the principles of beneficence, non-maleficence, justice and autonomy. Researchers and the tools they use should meet the following expectations:

- Through the University's Research Ethics Committee (and, for health research, the Health Research Ethics Committee of the Teaching Hospital), researchers should obtain informed consent from participants when collecting data for AI research and be transparent about the purpose, scope and potential risks of the study. Researchers should assess and mitigate biases in AI algorithms and models to ensure fair and equitable outcomes, especially in sensitive domains such as healthcare, forensic science and criminal justice.
- Research findings and methods involving AI should be transparently documented and shared with the academic community to facilitate peer review and reproducibility. Researchers must disclose the use of AI in theses, dissertations and publications and ensure proper data governance.
- Data used in AI research should be anonymised or de-identified whenever possible to protect the privacy and confidentiality of individuals, in compliance with the Nigeria Data Protection Act 2023. Ethics committees should have protocols to assess the ethical implications of AI research projects.

c. AI Use in Clinical Training and Health Services

Given the University's Faculties of Medicine and Dentistry, Allied Health Sciences and Pharmaceutical Sciences, and the Iyi-Enu Mission Teaching Hospital, AI use in clinical settings requires particular care:

- AI tools used for diagnosis, imaging, triage or treatment support must be validated for the local population and used only as decision support. Final clinical decisions remain the responsibility of qualified, licensed professionals.
- Patient data is sensitive personal data. It must not be entered into public or unapproved AI tools, and its processing must comply with the Nigeria Data Protection Act 2023 and applicable health-sector regulations.
- Students and staff should be trained to recognise the limitations, errors and biases of clinical AI tools and to communicate their use honestly to patients.

d. AI Use in Community Engagement

AI projects and initiatives aimed at community service should prioritise the well-being and interests of community members, in keeping with the Church's historic mission of service in education and health, and should foster empowerment and inclusivity. They should have the following characteristics:

- Community engagement should be integral to the design, development and implementation of AI solutions to societal challenges, so that the voices of all stakeholders are heard. AI projects should be culturally sensitive and contextually appropriate, taking into account the needs, values, languages (including Igbo) and norms of the communities they serve. AI can be used to develop tools for social good, such as healthcare interventions, community outreach programmes, support for small businesses in Onitsha and its environs, and environmental monitoring.
- Transparency and accountability mechanisms should be established so that AI applications in community service are used responsibly and ethically, with clear lines of responsibility for addressing concerns or grievances.
- Regular impact assessments should evaluate the effectiveness and ethical implications of AI interventions in community service, with a commitment to continuous improvement and learning.
- Projects involving AI-powered community services must be designed with community needs and participation in mind. Transparency and clear communication are essential to building trust with the communities served.

e. AI Use in Quality Assurance and Administration

AI systems used for quality assurance and administration should be transparent, accountable and aligned with the University's commitment to excellence and integrity. They should have the following characteristics:

- AI-driven quality assurance processes should enhance efficiency and accuracy while maintaining the highest standards of academic integrity and fairness.
- Regular audits and evaluations should assess the performance and reliability of AI systems used for quality assurance, with mechanisms to address any errors, biases or discrepancies.
- Staff involved in quality assurance should receive training on the ethical use of AI, including awareness of potential biases and unintended consequences.
- Students should be informed about the use of AI in quality assurance processes and given avenues for feedback and appeal if they have concerns about the fairness or accuracy of assessments. AI can be used to analyse student performance data, course evaluations and administrative processes, but it should be used alongside human expertise to provide a comprehensive evaluation.
- Data collected for quality assurance must be anonymised and used in accordance with the Nigeria Data Protection Act 2023. AI-driven measures must not lead to high-stakes decisions about students or staff (such as admission, discipline, grading appeals, promotion or dismissal) without proper human review.

f. General Principles

- AI systems should be designed and used in a way that avoids bias and discrimination based on factors such as ethnicity, religion, gender, disability or socio-economic status.
- AI decision-making processes should be transparent and explainable to ensure accountability and trust.
- Human oversight remains crucial in AI development and use, ensuring ethical decision-making and preventing unintended consequences.
- The potential societal impacts of AI, including job displacement and the ethical dilemmas of automation, should be considered. Human-to-human interaction should be maintained in the learning process to foster critical thinking, character formation and social skills, which are central to the University's mission.

Implementing the Draft Policy

a. Acceptable Level of AI Use with Full Disclosure

Drawing on suggestions by Ballery (2023), the following indicative ceilings are proposed for the proportion of AI-assisted content that is permissible in student work, provided it is fully disclosed. These are starting points for Faculty Boards to refine and for Senate to approve; individual lecturers may set lower limits for specific assessments.

Faculty	Indicative AI Usage (with full disclosure)
Faculty of Science and Computing	30–40%
Faculty of Medicine and Dentistry	10–15%
Faculty of Allied Health Sciences	10–20%
Faculty of Pharmaceutical Sciences	10–20%
Faculty of Arts, Management and Social Sciences	10–20%
Faculty of Law	5–10%
Religious Studies / Theology programmes	5–10%
New faculties (as approved by NUC)	To be set by Faculty Board

Table 1: Indicative acceptable levels of disclosed AI use by faculty

b. Roles and Responsibilities

Role	Responsible Faculty or Unit
Provision of AI tools and access for all students and staff; inclusivity	University Library (e-Library) and ICT Unit
Checking of AI use in coursework, theses and research	Faculties and Departments; Postgraduate School (when established)
Research and clinical ethics approval	Research Ethics Committee; Health Research Ethics Committee (Iyi-Enu Mission Teaching Hospital)
Penalty and enforcement	Faculties and Student Disciplinary Committee; Legal Unit for infringements outside the University, especially privacy violations
Capacity building	University Library, ICT Unit and the Department of Artificial Intelligence
Procurement of AI tools	University Library with the ICT Unit and Bursary
Channel of communication	Student → Course Lecturer → HOD → Dean → AI Policy Committee / University Librarian
Data governance and data protection compliance	Faculties, with the University Data Protection Officer
Risk mitigation	University Library and ICT Unit
Ethical and values formation	Chaplaincy and Directorate of Student Affairs

Table 2: Roles and responsibilities for implementing the AI policy

Monitoring and Evaluation

An effective AI policy requires constant monitoring and evaluation to ensure that it stays relevant, achieves its goals and adapts to changing circumstances. The following framework is proposed for monitoring and evaluating the AI policy of the University on the Niger.

Data collection methods:

- **Incident reporting system:** Create a system for reporting potential violations of the AI policy. This could be an online form, an anonymous reporting channel or designated personnel to receive reports. Open communication of concerns should be encouraged.

- **Internal audits:** Conduct periodic audits to assess compliance with the AI policy across faculties, departments, the Teaching Hospital and projects. Audits can be targeted or comprehensive depending on identified risks.
- **Stakeholder surveys:** Regularly survey staff and students to gather feedback on their experiences with AI, the policy's effectiveness and areas for improvement.
- **Analysis of AI use:** Track how AI is used within the University by analysing data on the types of AI tools used, their purpose, the units involved and the risks associated with specific use cases.

Evaluation criteria:

- **Policy awareness:** Assess stakeholders' awareness and understanding of the AI policy, including key principles, reporting procedures and access to resources.
- **Compliance:** Evaluate how effectively the policy is followed in different units and projects. Audits can provide data on compliance rates and identify areas where training or clarification is needed.
- **Risk mitigation:** Measure how effectively the policy mitigates identified risks. Analyse incident reports, audit findings and AI-use data to assess whether the policy addresses biases, privacy concerns or job displacement.
- **Stakeholder satisfaction:** Assess satisfaction with the policy among stakeholders. Surveys can measure perceptions of fairness, transparency and responsible AI use.
- **Alignment with goals:** Evaluate how well the policy aligns with the University's philosophy, vision and mission and its goals for responsible AI. Consider whether the policy promotes innovation, ethical conduct and societal benefit while mitigating risks.

Reporting and review:

- **Regular reports:** Prepare periodic reports to Senate summarising the data collected and the evaluation findings.
- **Stakeholder engagement:** Share the reports with relevant stakeholders and hold discussions on identified issues or areas for improvement. Open forums can encourage constructive feedback and collaborative solutions.
- **Policy updates:** Based on the evaluation findings, revise the AI policy as needed to address emerging challenges, technological advances or legal changes.

Additional considerations:

- **Metrics and benchmarks:** Establish clear metrics and benchmarks to measure the policy's effectiveness over time, such as participation rates in training programmes, the number of reported incidents or stakeholder satisfaction scores.
- **External resources:** Collaborate with external AI ethics organisations, NITDA/NCAIR, partner universities and experts for guidance on best practice in monitoring and evaluation and on emerging trends in responsible AI governance.
- **Transparency and communication:** Communicate the monitoring and evaluation process and its findings to the University community through newsletters, town-hall meetings or dedicated channels to foster trust and ownership of the policy.

By implementing a robust monitoring and evaluation framework, the University on the Niger can ensure that its AI policy remains effective in promoting responsible AI development and use while adapting to the ever-evolving technological landscape.

Conclusion

The development and implementation of the draft policy involve several key stages:

- **Initiation:** The process begins with identifying the need for a new policy or the revision of an existing one. This may stem from internal factors, such as organisational change, or external factors, such as legal requirements or societal shifts.
- **Research and analysis:** Once the need is established, research gathers relevant information. This includes studying best practices, consulting stakeholders, analysing data and assessing potential impacts.
- **Drafting:** Based on the research findings, a draft policy is prepared, defining objectives, outlining procedures, specifying roles and responsibilities, and incorporating legal and regulatory considerations.
- **Review and revision:** The draft is reviewed by stakeholders, experts, legal advisers and other relevant parties. Feedback is incorporated so that the policy is comprehensive, feasible and effective.
- **Approval:** After the necessary revisions, the final draft is presented to Senate for approval and to the University Council for ratification.
- **Implementation:** Once approved, the policy is disseminated to stakeholders, and procedures are put in place to ensure compliance through training sessions, communication campaigns and monitoring mechanisms.
- **Monitoring and evaluation:** After implementation, the policy's effectiveness is monitored through regular evaluation and feedback, and adjustments are made based on performance data and changing circumstances.

Universities are at the forefront of AI research and development, which makes a clear AI policy essential. This policy will safeguard students from potential biases in AI-powered education and assessment tools, promote responsible AI development by researchers and clinicians, and protect the privacy of students, staff and patients. It will also educate students about the societal and ethical implications of AI, preparing them for an AI-driven future. By establishing these guidelines early in its life, the University on the Niger will harness AI's potential to personalise learning, strengthen clinical training and advance research while mitigating risks and fostering trust. In this way it will remain faithful to its motto, *Lux Fiat Via Sapientia*, and to its mission of developing the moral, spiritual and academic life of young people.

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