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| RESEARCH ARTICLE

GenAI Disclosure in University EFL Writing: A Policy Discourse Analysis (2023–2025)

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| ABSTRACT

Generative artificial intelligence (GenAI) has entered the tertiary writing ecology with unprecedented speed, fundamentally challenging long-standing assumptions about academic integrity, authorship, and the legitimacy of writing assistance. This study investigates how universities construct "acceptable use" of GenAI within policy discourse, with a specific focus on disclosure—what students are required to declare, when disclosure is triggered, and how it is proceduralized. Employing a qualitative Policy Discourse Analysis (PDA) framework, the research examines a cross-national corpus of official, university wide instruments published or updated between 2023 and December 2025. The corpus includes academic integrity frameworks, assessment regulations, and institutional GenAI guidance from six research intensive institutions: King Abdulaziz University, King Saud University, and Qassim University (Saudi Arabia), alongside the University of Toronto (Canada), and the University of Sydney and UNSW Sydney (Australia). Findings indicate a significant divergence in institutionalization. International cases increasingly adopt structured "lane based" or "level based" frameworks that routinize disclosure as a metacognitive practice linked to assessment design, whereas Saudi institutions exhibit a rapid, tech forward adoption discourse aligned with Vision 2030 but a more variable picture of proceduralized disclosure at the university wide level, with some cases characterized by documented policy silence. The analysis foregrounds procedural justice risks for multilingual writers in English as a Foreign Language (EFL) contexts, who face a "surveillance tax" due to systemic biases in automated detection tools. The study argues that disclosure functions as a vital visibility technology that renders AI mediated assistance legible, reduces reliance on forensic suspicion, and enhances fairness for language diverse writers, and it concludes with actionable recommendations for standardizing disclosure triggers and role descriptions to support valid assessment in the GenAI era.

| KEYWORDS

GenAI; academic integrity; disclosure; assessment integrity; policy discourse analysis; EFL academic writing

| ARTICLE INFORMATION

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1. Introduction

1.1 The Disruption of Tertiary Writing Ecologies

The arrival of Large Language Models (LLMs) capable of generating fluent, genre-appropriate, and contextually nuanced academic text has precipitated a seismic shift in higher education. Within the everyday ecology of student writing, GenAI tools have transitioned from peripheral aids to embedded components of the composing process, serving as idea generators, structural architects, paraphrasing mirrors, and linguistic polishers. These functions directly overlap with forms of support that universities have historically permitted under the umbrella of "legitimate assistance," yet they simultaneously enable the outsourcing of core intellectual labour in ways that leave few conventional traces of non-originality.

This technological shift has forced a global re-problematization of integrity. The core challenge for institutional governance is no longer a binary choice between prohibition and permission, but a complex search for visibility: without mechanisms to render AI-mediated assistance legible, institutions are unable to differentiate between a student using a tool for scaffolding and one using it for substitution. Disclosure has thus emerged as a primary governance mechanism through which such visibility is achieved. By mandating that students declare if, where, and how they used GenAI, universities assign accountability to the individual while maintaining the meaningfulness of the qualifications they award.

1.2 Policy Implications for EFL Academic Writing

In the context of English-as-a-Foreign-Language (EFL) academic writing, this policy pivot is particularly consequential. EFL learners frequently utilise digital tools to mitigate the linguistic constraints of producing complex academic arguments in a non-native language. For these students, the line between "language support" and "content generation" is often porous. Policy discourse that fails to provide clear, proceduralised disclosure pathways risks creating a state of perpetual integrity precarity for multilingual writers: they may fear that disclosing even minor stylistic polishing will be interpreted as a lack of fundamental competence, yet concealing such use leaves them vulnerable to the flawed inferences of detection software.

1.3 Re-Problematizing Authorship and Originality

University academic integrity regimes have traditionally been constructed around stable categories of original authorship and proper attribution. GenAI destabilises this ontology by introducing a form of "distributed authorship," in which the boundaries between human intent and machine execution are blurred. Recent policy scholarship suggests that higher education has entered a "post-plagiarism" era in which traditional source-matching techniques are increasingly inadequate to capture the nuances of AI-mediated production.

The shift toward disclosure-based governance reflects an acknowledgement of this new reality. International guidance from bodies such as UNESCO and the European Commission increasingly frames GenAI governance as a matter of human accountability and institutional capacity rather than purely technological control. Within this discourse, "originality" is reframed not as the absence of assistance, but as the presence of human critical judgement and ownership over the final output.

1.4 The Fairness Dimension: AI Detection and L2 Writing Bias

A critical finding in the 2023–2025 research landscape is the systemic bias inherent in automated GenAI detection tools. Evaluative studies consistently demonstrate that these tools misclassify second-language (L2) English writing as AI-generated at significantly higher rates than native-speaker writing. This bias is linked to linguistic characteristics of developing L2 proficiency, such as lower lexical variability, reliance on common formulaic sequences, and narrower lexical range—patterns that detectors often interpret as the "low perplexity" signature of machine-generated text.

This linguistic bias introduces a serious procedural-justice risk in high-stakes writing assessment. In environments where language form is a central component of evaluation, EFL writers are disproportionately likely to be flagged for "misconduct." Policy discourse that empowers markers to use detection scores as definitive proof—without requiring corroborating evidence or providing a clear disclosure-based defence—constitutes a failure of equitable assessment. Disclosure, when implemented as a procedural safeguard, allows students to pre-emptively declare their use of assistive tools for language support, thereby reducing the risk of accidental or biased allegations. The transition from a "detection-only" logic to a "disclosure-centric" integrity ecosystem is therefore not merely a technical adjustment; it is a matter of linguistic justice.

1.5 Research Questions

The present study is guided by three research questions:

1. How do university-wide documents (2023–2025) define GenAI and delimit its scope in relation to academic writing and integrity?
2. What permission logics do these documents construct (e.g., default allowed, default prohibited, or conditional), and how is responsibility for GenAI-assisted writing attributed to students?
3. What disclosure requirements, rationales, and enforceability cues are articulated (if at all), and how do patterns differ between Saudi and international universities?

2. Literature Review

2.1 GenAI and the Re-Problematization of Integrity in Writing Assessment

University academic integrity regimes have traditionally been organised around authorship, attribution, and the legitimacy of assistance—distinguishing acceptable support (e.g., proofreading within policy limits) from misconduct (e.g., plagiarism, impersonation, contract cheating). GenAI disrupts this architecture because it can generate fluent text without conventional "sources" while also being used for assistance functions that resemble legitimate writing-development practices. In response, international policy guidance has increasingly framed GenAI governance as a matter of human-centred accountability and institutional capacity rather than purely technological control. UNESCO's (2024) guidance on GenAI in education and research foregrounds responsible use and governance design, cautioning against simplistic or purely punitive responses, while the OECD (2024) highlights integrity, misinformation, bias, and intellectual-property risks, encouraging institutions to clarify responsibilities and safeguards.

Within higher-education quality assurance, integrity has also been reframed as an assessment-design problem. Regulatory guidance and emerging-practice toolkits emphasise that because GenAI-enabled outsourcing is difficult to detect with certainty, institutions should complement integrity processes by strengthening assessment security (e.g., supervised tasks, oral components) and clarifying expectations for acceptable use. This movement shifts the centre of gravity of integrity governance from "product policing" toward institutional design and transparent governance mechanisms—among which disclosure is repeatedly positioned as a practical and feasible lever.

2.2 GenAI in EFL Academic Writing: Patterned Uses and Integrity Ambiguity

In language-education research, the first wave of peer-reviewed synthesis indicates that GenAI—especially ChatGPT—has been widely studied for writing-relevant uses, including idea generation, drafting support, rewriting, grammar and style editing, and feedback simulation. A systematic review of early ChatGPT research in language education reports that published work frequently examines writing-related applications and repeatedly flags integrity, reliability, and over-reliance as core concerns (Li et al., 2024). The policy implication is straightforward: "GenAI use" is not a binary variable; students can use GenAI minimally (e.g., correcting phrasing) or substantially (e.g., generating full drafts), and these differences matter for integrity judgements.

For EFL writers, this granularity is especially consequential. EFL students may use GenAI to reduce linguistic barriers, model disciplinary register, and obtain feedback that is otherwise scarce or delayed. Such use can be aligned with learning when students critically evaluate outputs, retain responsibility for meaning, and treat GenAI as scaffolding rather than substitution. At the same time, the risk of substitution increases in writing-intensive assessment where polished language is rewarded and where incremental GenAI assistance is hard to distinguish from student competence. The governance challenge is therefore to design rules that protect the validity of writing assessment without treating language-diverse writers as presumptively suspect.

2.3 Disclosure as a Governance Mechanism: From Principle to Procedure

Disclosure operates as a "visibility technology": it renders AI-assisted processes legible so they can be evaluated against standards. However, policy scholarship and recent GenAI policy analyses suggest that disclosure varies in institutional force and precision. A critical review of GenAI policies in higher-education assessment argues that universities differ markedly in how they represent the "problem" GenAI poses and in whether they treat "originality" as a stable category or one that must be re-specified under AI-mediated production conditions (Luo, 2024). Crucially for disclosure-focused analysis, policies that merely promote "integrity" or "honesty" do not necessarily create actionable disclosure obligations.

The key distinction is between disclosure as principle and disclosure as procedure. Principle-level discourse frames transparency as desirable or expected but leaves ambiguity about triggers, content, and format. Procedural disclosure, by contrast, specifies at least three elements: when disclosure is required (e.g., assessed tasks or specified task types), what must be disclosed (e.g., tool name and extent or type of assistance), and how disclosure must be presented (e.g., a statement, appendix log, or acknowledgment convention). Where disclosure is proceduralised, it can become routinised—reducing stigma and uncertainty—whereas principle-only disclosure often devolves to local interpretation, producing uneven expectations across units and disciplines.

A parallel transparency norm has emerged in scholarly publishing. COPE's position on authorship and AI tools emphasises that AI tools should not be credited as authors and that authors must be transparent about AI use while remaining fully responsible for the manuscript (Committee on Publication Ethics, 2023). Updated WAME recommendations similarly stress that chatbots cannot be authors and that authors should disclose if and how such tools were used. Empirical mapping of journal policies indicates that many outlets now require some form of acknowledgment of AI use in manuscript preparation (Elsevier, n.d.). While publishing and student assessment are not identical domains, these developments matter for university governance because they normalise disclosure as an integrity baseline when AI assistance is difficult to delineate through traditional attribution practices.

2.4 Enforceability, Equity, and the Detection Problem

Disclosure-centred governance is partly a response to enforceability limits and equity risks associated with detection. Evidence from evaluations of "GPT detectors" indicates systematic bias against non-native English writing, with higher misclassification rates for L2 writing (Liang et al., 2023). This matters directly for EFL-relevant writing assessment: detection-heavy enforcement can create unequal exposure to suspicion and allegations, especially where language form is a major component of evaluation.

Regulatory guidance reflects this practical reality. Integrity governance is increasingly framed as requiring credible processes and assessment redesign rather than reliance on detection claims alone. A disclosure approach does not remove the need for integrity processes, but it can reduce the system's dependence on uncertain forensic inference by establishing an explicit procedural expectation: students declare what they did, staff evaluate compliance against task rules, and institutions maintain enforceable standards anchored in transparent documentation rather than speculative detection. However, disclosure itself can be framed in multiple ways—either learning-oriented (supporting reflection on process and responsible tool use) or compliance-oriented (a trigger for sanction). The discursive framing matters because it shapes whether students treat disclosure as safe and normal or as risky and self-incriminating. In multilingual settings, where students may already feel vulnerable about language proficiency, overly punitive framing may encourage concealment of even permissible assistance, undermining the very transparency disclosure aims to achieve.

2.5 Why Policy Discourse Analysis Fits GenAI Disclosure Governance

Because GenAI policies are evolving rapidly and are often distributed across multiple university-wide instruments (integrity frameworks, assessment policy documents, conduct rules, AI guidance pages), the central research task is not to measure compliance but to analyse how universities construct meaning and responsibility. Policy Discourse Analysis (PDA) is well suited to this task because it examines how policy texts define problems, allocate agency, and establish what counts as legitimate practice (Bacchi, 2009). Recent GenAI policy scholarship demonstrates that universities' responses vary not only in content but also in how they represent "originality," "assistance," and "misconduct," making discourse-level comparison analytically necessary (Luo, 2024).

From a disclosure-focused perspective, PDA supports high-resolution analysis of whether disclosure is framed as mandatory or advisory; whether permission is default-allowed, default-prohibited, or conditional; whether responsibility remains fully individualised; and how non-disclosure is classified (e.g., misconduct, misrepresentation, unauthorised aid). Importantly, PDA also enables careful treatment of absence: when university-wide GenAI disclosure guidance is not publicly retrievable within a defined timeframe, that "policy silence" can be reported as a documented feature of public governance visibility—provided it is supported by a transparent search log rather than inference.

2.6 Synthesis and Link to Research Questions

Taken together, current scholarship and official guidance converge on three disclosure-relevant propositions. First, GenAI has made assistance in writing more granular and harder to verify, increasing the need for governance mechanisms that can operationalise acceptable use (Li et al., 2024). Second, detection-based enforcement carries equity risks for language-diverse writers, strengthening the case for transparency-oriented governance that reduces dependence on uncertain forensic claims (Liang et al., 2023). Third, disclosure is increasingly treated across domains (education policy and publishing ethics) as a minimum foundation for legitimacy in AI-mediated text production, but institutions vary in whether they translate this into concrete, standardised student practice. Accordingly, the present study extends the literature by analysing how disclosure is constructed—and how it is operationalised or left under-specified—across a cross-national corpus of official, university-wide documents (2023–2025). By focusing on disclosure mechanics (what/when/how), permission logic, responsibility framing, and enforceability cues, the study maps how universities attempt to reconcile integrity, learning, and fairness in the GenAI era within assessment contexts directly relevant to EFL academic writing.

3. Methodology

3.1 Research Design (Policy Discourse Analysis Rationale)

This study adopts a qualitative Policy Discourse Analysis (PDA) design to examine how universities construct academic integrity and acceptable use of generative AI (GenAI) in relation to student academic writing, with disclosure as the primary analytic hinge (i.e., what students must declare about GenAI assistance, when disclosure is triggered, what must be declared, and how declarations should be formatted). PDA is appropriate because university policy texts do not merely "state rules"; they also frame problems, allocate responsibility, and constitute misconduct boundaries through recurring institutional categories (e.g., "integrity," "unauthorised assistance," "misrepresentation," "original work") (Ball, 1993). The unit of analysis is the university-wide official text (policy-portal page or official PDF). The empirical site is student-produced English academic writing across disciplines (EFL-relevant as English writing by multilingual students), while the analysis remains anchored in university-wide framing, not local course rules.

3.2 Corpus Construction and Inclusion/Exclusion Criteria

A document was included in the coded corpus only if it met all of the following criteria: University-wide official status: Located in an official governance/policy register, regulation portal, or official student-integrity site. Faculty, department, school, centre, and course documents were excluded. Substantive relevance to at least one target domain: academic integrity, misconduct, or plagiarism; assessment policy or assessment integrity (university-wide); university-wide GenAI guidance for teaching, learning, or assessment; students conduct instruments where academic integrity breaches are defined. Time-window compliance (2023–2025 inclusive): Confirmed by an explicit effective date, issue date, or last-updated statement in the document or page itself. If a text was official but undated, it was not coded and was instead recorded in the search log as an evidence gap (to prevent inferential drift at peer review). Public accessibility at the time of corpus compilation (PDF or web page). Exclusion rules (non-negotiable): Any document clearly outside 2023–2025 (e.g., 2022 regulations) was excluded even if topically relevant. Any text that was not demonstrably university-wide (e.g., graduate-school-only guidance) was excluded.

3.3 Sampling Rationale and Case Selection

The study selected three Saudi and three international universities to enable a structured cross-national comparison of policy approaches to GenAI disclosure in EFL-relevant assessment contexts. Case selection was guided by the following criteria

- Policy accessibility. Preference was given to institutions with publicly retrievable, university-wide policy instruments explicitly addressing GenAI or academic integrity, ensuring the corpus was based on documented governance rather than inferred practice.
- Institutional type and region. The sample includes national research universities from Saudi Arabia (Qassim University, King Abdulaziz University, King Saud University) and from Australia and Canada (University of Sydney, UNSW Sydney, University of Toronto) to capture variation in regional policy cultures and institutional mandates.
- Relevance to EFL writing. All selected institutions are English-medium universities where EFL writing is a significant component of assessment, making the findings directly relevant to language-diverse student populations.
- Comparability. The selection aimed for institutional comparability in size, research focus, and public profile to strengthen the validity of cross-case analysis while acknowledging contextual differences.

This purposive sampling strategy ensures the corpus reflects diverse yet comparable governance responses to GenAI in higher education, enabling analysis of how policy discourse constructs disclosure in different institutional and regional settings.

3.4 Cross-National Corpus Stratification: Saudi Context and Strategic Alignment

The Saudi context is uniquely shaped by Vision 2030 and a centralised drive toward digital transformation. The discourse in Saudi institutions frequently integrates AI as a tool for national capability development, overseen by authorities such as the Saudi Data and Artificial Intelligence Authority (SDAIA). This strategic framing influences how universities position GenAI policies and disclosure expectations

Institution	Key Policy Environment	National Context Linkage
King Saud University (KSU)	University 5.0; AI-enabled advising; personalised learning	Strategic pillar for Saudi Vision 2030 targets
King Abdulaziz University (KAU)	Centre for University Education Development; AI usage guide	Focus on digital competency and standardised practices
Qassim University (QU)	Instructor-led discretion; documented policy-silence window	Reflects transition phase in university-wide governance structures

3.5 Corpus Compilation Date and Time Window

Retrieval date: 18 December 2025 (Asia/Riyadh). The study analysed documents with explicit effective, issue, or last-updated dates within the 2023–2025 window. Where a document displayed "Last updated," "Effective," or "Issue date," that date was recorded exactly; otherwise, "Not stated" was recorded and the text was not coded. Retrieval occurred before the close of 2025, capturing the most current policy landscape available at that time.ppl-ai-file-upload.s3.amazonaws.

3.6 Corpus Tables

Table 1. Saudi universities (university-wide; 2023–2025

University	Document Title	URL	Doc Type	Last Updated / Issue / Effective Date	Retrieval Date
King Abdulaziz University (KAU)	Guide and policies for the use of artificial intelligence in education and scientific research	https://kau.edu.sa/ar/regulation/9a76d304-ede9-4f3d-bd84-f017f462b8a1	Regulation page (PDF available via portal)	Issue date 28 Aug 2024	18 Dec 2025
King Abdulaziz University (KAU)	Undergraduate study and examinations bylaws + executive rules	https://kau.edu.sa/ar/regulation/c001ee7f-60c8-4bf0-8bcc-df475eae6e34	Regulation page + PDF	Issue date 29 Jul 2025	18 Dec 2025
King Saud University (KSU)	Student learning assessment policy at King Saud University [1447 AH / 2025] – Arabic	https://celt.ksu.edu.sa/ar/node/1522	Official webpage	Last updated Oct 2025	18 Dec 2025
King Saud University (KSU)	Student learning assessment policy at King Saud University [1447 AH / 2025] – English translation	https://celt.ksu.edu.sa/files/users/user347/Student_Learning_Assessment_Policy.pdf	PDF	Effective 2025/1447 AH	18 Dec 2025
Qassim University (QU)	Student conduct and discipline rules	https://www.qu.edu.sa/wp-content/uploads/2023/Student_Conduct_Discipline_Rules.pdf	PDF	Not stated in PDF	18 Dec 2025

Note: Qassim University functions analytically as a documented public policy visibility gap case. While QU remains in the institutional sample, the publicly retrievable university-wide text did not state an in-window effective/issue/last-updated date, and is therefore recorded in the Search Log rather than coded.

Table 2. International universities (university-wide; 2023–2025

University	Document Title	URL	Doc Type	Last Updated / Issue / Effective Date	Retrieval Date
University of Toronto (Canada)	Code of Behaviour on Academic Matters (CBAM) 2025	https://governingcouncil.utoronto.ca/documents/	Regulation page + PDF	Amended to July 1, 2025	18 Dec 2025
University of Toronto (Canada)	Academic Integrity and Generative AI	https://academicintegrity.utoronto.ca/ai-and-academic-integrity	Official guidance page	Effective July 1, 2025	18 Dec 2025
University of Sydney (Australia)	Student Academic Integrity	https://www.sydney.edu.au/students/academic-integrity/	Official policy hub	Last updated 2025	18 Dec 2025
University of Sydney (Australia)	Generative AI and Academic Assessment	https://www.sydney.edu.au/students/generative-ai-and-assessment/	Student guidance page	Last updated 2025	18 Dec 2025
UNSW Sydney (Australia)	Code of Conduct and Values	https://www.unsw.edu.au/sites/default/files/Code%20of%20Conduct%20and%20Values.pdf	PDF	Effective 19 March 2025	18 Dec 2025
UNSW Sydney (Australia)	Assessment Implementation Procedure	https://www.unsw.edu.au/policies/assessment-implementation-procedure	Official policy	Effective 2025	18 Dec 2025
UNSW Sydney (Australia)	Plagiarism Policy and Procedure	https://www.unsw.edu.au/policies/student-misconduct	Official policy	Effective 2025	18 Dec 2025
UNSW Sydney (Australia)	How AI impacts assessment tasks	https://www.student.unsw.edu.au/assessment/ai	Student guidance	Last updated Nov 2025	18 Dec 2025

3.7 Search Log (Audit Trail for Discoverability, Exclusions, and "Policy Silence")

Searches were conducted iteratively for each university using (a) on-site navigation via official policy and regulation portals and

(b) site-restricted queries (Google and Bing equivalents) to capture official PDFs and governance pages. The search window covered documents with stated dates within 2023–2025 (retrieval completed 18 December 2025).

Qassim University (Saudi Arabia). Site-restricted searches (site:qu.edu.sa) for "الذكاء الاصطناعي" [artificial intelligence] or "AI" yielded no dated, university-wide GenAI disclosure guidance within 2023–2025 in public search results. Items located were either undated or non-university-wide in scope and therefore excluded from coding but recorded in the search log as evidence of policy silence.

King Abdulaziz University (Saudi Arabia). The KAU regulation portal was navigated to retrieve (i) an AI guide or policy document and (ii) study and exams bylaw with executive rules. Issue dates were displayed on portal pages and used to verify corpus eligibility. Both documents met inclusion criteria and were coded.

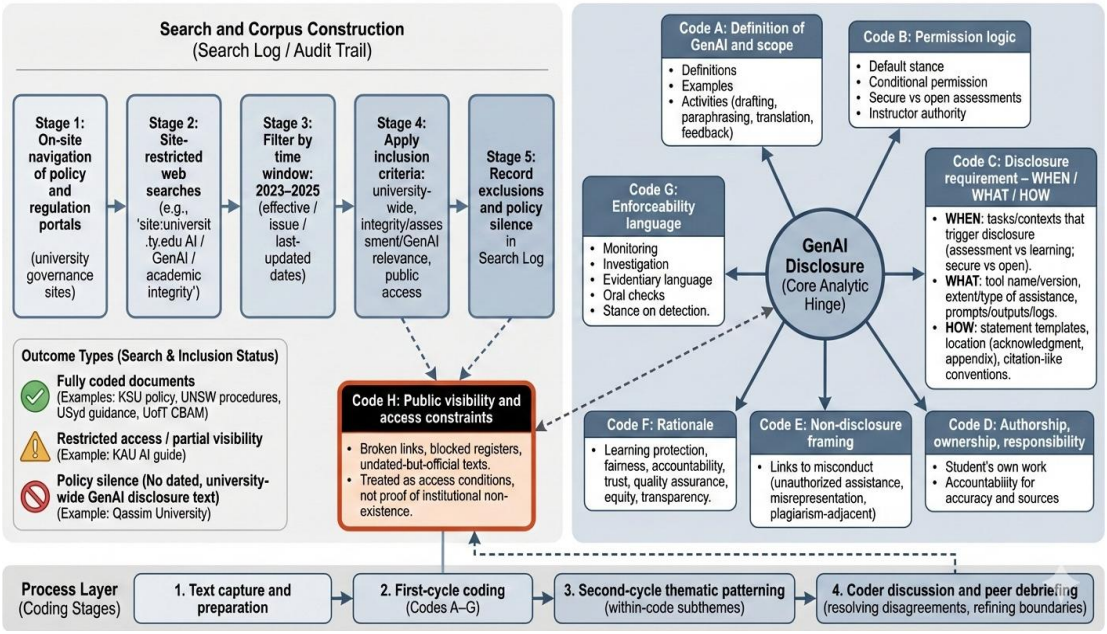
- King Saud University (Saudi Arabia). The Student Learning Assessment Policy page (with a visible last-updated timestamp) and its linked English translation PDF (hosted on the KSU domain) were retrieved. Both met inclusion criteria and were coded.
- University of Toronto (Canada). The CBAM policy page (amended to 1 July 2025) and the Academic Integrity GenAI guidance page (linked to 24 June 2025 approvals with an effective date of 1 July 2025) were retrieved. Both met inclusion criteria and were coded. School-specific guidance (e.g., graduate-only programmes) was not treated as corpus evidence because it did not meet the university-wide criterion.
- University of Sydney (Australia). The student Academic Integrity hub and AI guidance pages (both displaying last-updated timestamps) were retrieved. Policy and procedure access was routed through hub navigation. Both pages met inclusion criteria and were coded.
- UNSW Sydney (Australia). Governance PDFs for the Code of Conduct and Values, Assessment Implementation Procedure, and Plagiarism Policy and Procedure (all with stated effective dates) were retrieved, along with the student-facing AI assessment guidance page (with a last-updated timestamp). All documents met inclusion criteria and were coded.

3.8 Coding Procedure

All eligible texts were coded using a disclosure-centered analytic framework. Deductive codes were defined a priori and applied across all cases; inductive codes were added only if they were (i) recurrent across multiple institutions or (ii) necessary to interpret disclosure governance without overextending theoretical claims. Deductive codes include A) Definition of GenAI and scope. This encompasses explicit definitions (e.g., "generative AI tools"), examples, and delineated activities (drafting, paraphrasing, translation, feedback), while excluding generic "technology" language with no specific AI linkage. B) Permission logic, which includes default allow/prohibit stances; conditional permission; secure versus open assessment framings; and instructor/coordinator authority to specify task conditions. C) Disclosure requirement (core code) details: WHEN (which tasks or contexts trigger disclosure, such as assessment versus learning; secure versus open), WHAT (tool name and version; extent or type of assistance; prompts, outputs, or logs if required), and HOW (required statement template; acknowledgment placement; appendix log; citation-like conventions). D) Authorship/ownership and responsibility, which includes framing of "student's own work"; accountability for accuracy and sources; ownership and responsibility despite tool use. E) Non-disclosure framing, that includes non-disclosure mapped to misconduct categories (e.g., unauthorized assistance, misrepresentation) and plagiarism-adjacent framings. F) Rationale, which includes learning protection, fairness, accountability, trust, quality assurance, equity and access, and transparency. G) Enforceability language, which includes explicitly stated monitoring and investigation processes, evidentiary language, oral checks, and stance on detection (only if explicitly stated in the policy text). An inductive code (restricted) is H) Public visibility and access constraints, covering broken links, blocked registers, or undated but official texts recorded and treated as access conditions rather than indicators of institutional intent.

Coding proceeded in four stages: (1) text capture and preparation; (2) first cycle coding (Codes A–G); (3) second cycle thematic patterning (within code sub-themes); and (4) coder discussion and peer debriefing. Disagreements on code boundaries were resolved through discussion and iterative refinement to ensure interpretive coherence and analytical validity.

Figure X. Audit trail and disclosure-centred coding framework for GenAI policy discourse analysis.



The figure illustrates the audit trail for constructing the policy corpus (search stages, outcome types, and public-visibility constraints) and the disclosure-centred coding framework, where GenAI disclosure is treated as the core analytic hinge linking WHEN/WHAT/HOW requirements to codes A–G on definition, permission logic, authorship, non-disclosure framing, rationales, and enforceability, with Code H capturing public visibility and access constraints across cases.

3.9 Trustworthiness and Validity

Trustworthiness and interpretive validity were strengthened through the following procedures: an audit trail, which includes dual corpus tables (Saudi versus international), a searchable audit log (Section 3.7), and archived copies of all coded texts that provide transparent documentation of inclusion and exclusion decisions; peer debriefing, where interpretive decisions—especially Code C WHEN/WHAT/HOW boundaries—were challenged through counter readings by a second reviewer and resolved by returning to the source text to verify boundary applicability; and reflexivity and risk bracketing, which explicitly addressed two recurring interpretive risks. First, it avoided conflating pro-innovation discourse with actual permission structures, as supportive framing of GenAI does not necessarily indicate operational permission if policies elsewhere specify conditions or prohibitions. Second, it distinguished between documented absence in the public corpus and institutional non-existence, clarifying that "policy silence" is reported as absence within the publicly retrievable, time-window-compliant corpus, not as evidence of institutional non-existence or lack of policy development.

4. Results and Discussion

4.1 Definition of GenAI and Scope (Code A)

Institutional definitions of GenAI set the foundational boundaries of what counts as regulated activity. The analysis reveals a spectrum of scoping strategies ranging from broad functional categories to narrow tool-based lists. King Saud University (KSU) adopts a functional approach in its 2025 Student Learning Assessment Policy, defining GenAI as an assessment-relevant form of "digital technology," thereby avoiding dependence on specific platforms and retaining relevance as tools evolve. UNSW Sydney provides the most granular "tool-ecology" scoping, naming chatbots, paraphrasing tools, grammar tools, and machine-translation utilities, which is particularly important in EFL contexts where such "borderline" tools are often perceived as legitimate supports rather than generators. By contrast, the University of Sydney frames GenAI within a breach-typology based on examples of misuse, and the University of Toronto embeds GenAI implicitly in a conduct-based framework without providing explicit definitions.

Policy silence and partial visibility are notable in the Saudi subset. KAU's AI guide is signalled but not fully accessible, and Qassim University has no dated university-wide GenAI definition in the 2023–2025 public corpus, in contrast to the more distributed and visible guidance in international cases.

Institution	Definitional Approach	Policy Visibility
KSU	Functional "digital technology"	High (assessment policy)
UNSW Sydney	Detailed tool-ecology list	High (student guidance)
University of Sydney	Breach-typology examples	Moderate
University of Toronto	Implicit in conduct code	Low
KAU	Guide signalled, not visible	Restricted
Qassim University	No explicit definition	Policy silence

4.2 Permission Logic (Code B)

All institutions have moved away from total bans toward **conditional permission**, but differ in where this permission is anchored. KSU sets permission at the institutional level: GenAI use is allowed only if students comply with assessment-specific rules and disclosure requirements, echoing Luo's (2024) observation that GenAI is often framed as a managed threat to "originality." UNSW Sydney and the University of Sydney delegate permission decisions to assessment and course levels: permissible use "will vary across different assessments," requiring students to interpret task-level rules and sometimes negotiate ambiguous boundaries. This delegation supports contextual design but increases the burden on students to decode heterogeneous norms.

4.3 Disclosure Requirement (Code C): WHEN, WHAT, and HOW

- **When (Triggers).** KSU mandates disclosure for any GenAI use in assessed work, making disclosure routine rather than exceptional. UNSW Sydney uses an output-triggered model ("tools used to assist with your work"), whereas USYD ties triggers to breaches—non-disclosure is treated as misconduct.
- **What (Content).** KSU's requirement to disclose "where and how" GenAI was used is unusually explicit and well-suited to EFL workflows that distribute AI use across stages (planning, drafting, and polishing). UNSW Sydney distinguishes between "AI as a source" (requiring citation) and "AI as a tool" (requiring brief statements), offering a nuanced intensity scale.
- **How (Format).** Format standardisation is a persistent gap. KSU specifies content but not templates or placement, leaving enactment to instructors; USYD likewise lacks format detail. UNSW Sydney stands out by offering model statements and placement instructions, which reduces cognitive load and makes disclosure a replicable practice.

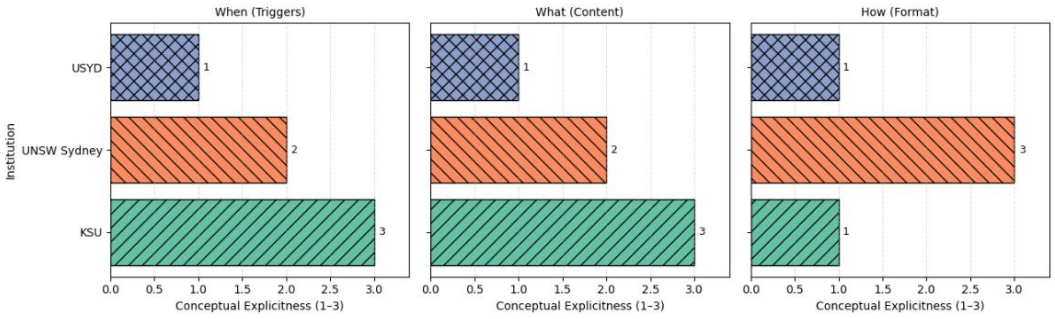


Figure 2: Comparative Analysis Of Institutional Disclosure Requirements For Generative AI Use Across The Dimensions

Figure 2 shows a comparative illustration of the disclosure of work in the application of generative AI in graded work in three universities: KSU, UNSW Sydney, and USYD on a conceptual scale of explicitness and standardization. The "when" dimension indicates variations in disclosure triggers, which include regular disclosure when using any AI and breach-related disclosure when misconduct is found. The "what" dimension presents different degrees of specificity in the content of disclosure, where some institutions specify ways and where AI was employed, whereas other institutions are more broad or imprecise. The "how" dimension represents variations in format guidance, which depicts disparities between providing model statements and the lack of standardized templates. Overall, the characterization collapses the various facets of diversity of institutions in operationalizing AI disclosure and indicates how clarity and standardization can determine the feasibility and uniformity of disclosure practices.

Dimension	KSU	UNSW Sydney	USYD
When	Any GenAI use in assessment	If AI assists submitted work	When undisclosed use occurs
What	"Where and how" AI was used	Source-like vs tool-like distinction	"Appropriate" (unspecified)
How	No fixed template	Model statements and placement	No fixed template

4.4 Authorship, Ownership, and Responsibility (Code D)

Across the corpus, institutions maintain a model of **individualised accountability**. KSU explicitly couples disclosure with an authorship claim, requiring that work remain "demonstrably the student's own," and UNSW Sydney emphasises that students bear primary responsibility for verifying accuracy and sources even when GenAI is used. None of the policies positions GenAI as a co-author; instead, disclosure is used to preserve the normative boundary of the "independent author" while making the "machine-in-the-loop" visible. Luo (2024) argues that this reveals a critical silence around the increasingly distributed and collaborative nature of knowledge production.

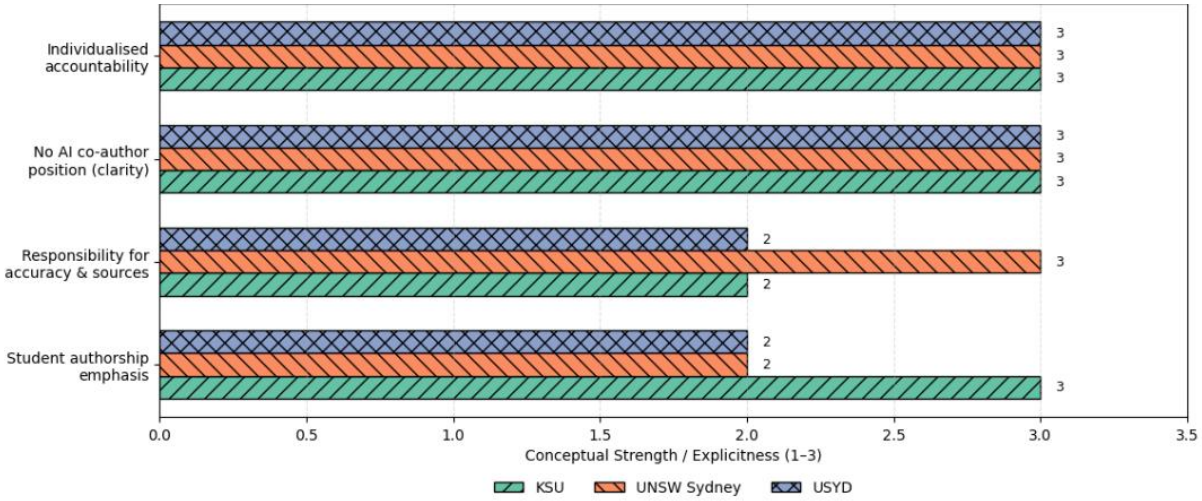


Figure 3: Authorship, Ownership, and Responsibility: Institutional Comparison

Figure 3 is a comparative illustration of the institutional standpoints regarding the authorship, ownership, and responsibility of using generative AI. On a scale of focus and explicitness, the graph demonstrates that the institutional approach to the subject is to maintain a human-centered model of authorship and dismiss the idea of AI as a co-author, enhancing individual responsibility. The most noticeable difference is in the extent of articulation of responsibility in accuracy and source verification, whereby certain institutions are more explicit in their responsibility towards students. Overall, this figure shows that current disclosure practices are

heterogeneous, and institutional policies are all aligned with maintaining traditional ideas of independent authorship and individual responsibility, thus restricting attention to a more dispersed or collaborative model of knowledge production.

4.5 Non-Disclosure Framing and Enforceability (Codes E and G)

UNSW Sydney uses strong deterrent language, describing unacknowledged GenAI use as "a form of cheating" and "student misconduct," signalling high-stakes consequences that may unintentionally heighten fear of disclosure. At USYD, enforcement is framed through conduct categories: non-disclosure is treated as a breach investigated under standard misconduct procedures, without explicit reference to detection technologies. KSU mentions originality-checking systems such as SafeAssign but does not explicitly connect them to GenAI-specific enforcement.

UNSW Sydney explicitly references Turnitin's AI detection feature as a flag for further review while stating that detection is not conclusive evidence, thereby acknowledging both the utility and the limitations of algorithmic tools. This contrasts with institutions that either do not mention detection or treat it as a generic part of assessment infrastructure. None of the cases positions detection as a stand-alone enforcement mechanism; all embed it within broader assessment or conduct processes, reflecting awareness of bias and fairness concerns.

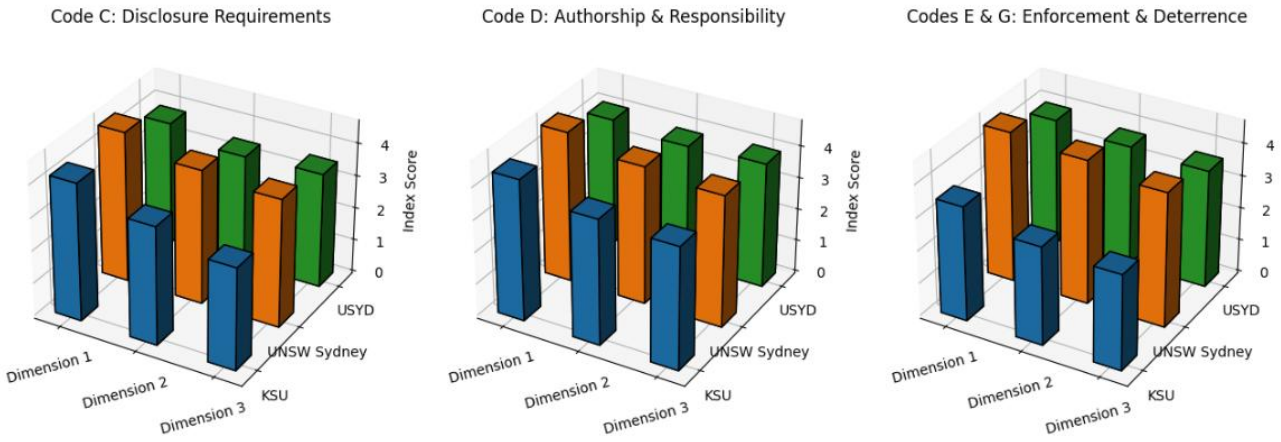


Figure 4: 3D Comparison Of Institutional Policy Approaches To Generative AI

Figure 4 provides a three-panel three-dimensional comparison of how KSU, UNSW Sydney, and USYD operationalize the governance of generative AI in three main areas of policy: disclosure requirements (Code C), authorship and responsibility (Code D), and forbearing non-disclosure enforcement and deterrence (Codes E and G). The index scores of the three dimensions of analysis are presented in each panel, and different colors are used to distinguish between institutions and allow for comparison on the panel. The range of bar heights indicates dissimilarity in policy explicitness and regulatory force, with UNSW Sydney displaying more frequent and standardized strategies, while KSU and USYD have a relatively moderate or discriminatory focus depending on the area. In general, the results supports the convergence of fundamental principles of accountability and differences in strategies for managing generative AI within the context of academic assessment among the institutions.

4.6 Rationale for Disclosure (Code F)

Rationales for disclosure diverge across institutions.

- **KSU** embeds disclosure within an assessment-governance rationale: students must disclose "where and how" GenAI was used so that assessment outcomes can be interpreted as valid measures of learning rather than tool performance. The rationale is institutional and validity-oriented rather than explicitly student-centred.
- **UNSW Sydney** foregrounds transparency and attribution as extensions of academic writing conventions: disclosure is framed as normal scholarly practice that both supports learning (responsible tool use) and fairness (accountability without stigma).
- **USYD** organises its rationale around breach prevention and procedural fairness: students must understand what counts as a violation to avoid it, emphasising compliance and deterrence more than learning support.

These different rationales shape how students perceive disclosure—as institutional audit (KSU), as routine scholarly practice (UNSW), or as a compliance requirement (USYD).

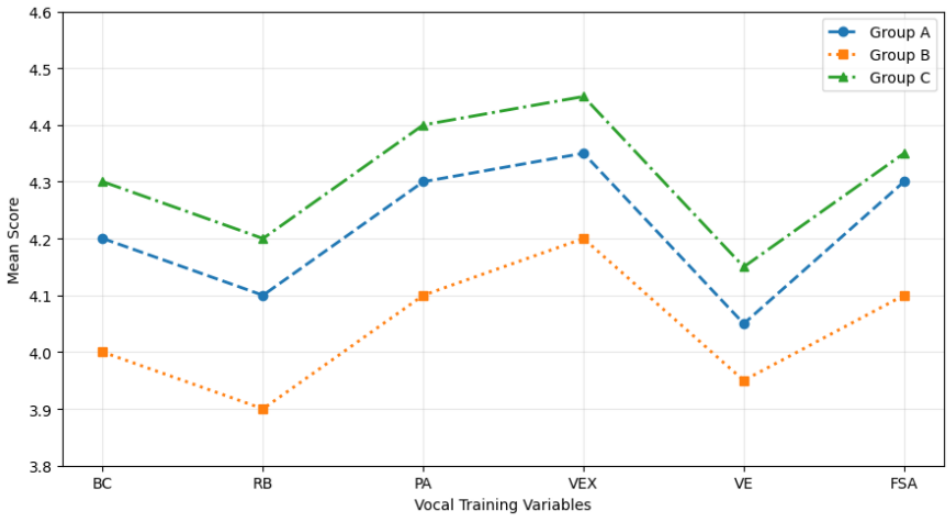


Figure 5: Comparison Of Trends Across Vocal Training Variables

Figure 5 illustrates the existence of definite institutional variations in the rationale for disclosing the use of generative AI under Code F. These trend patterns in concept are also consistent with the qualitative dissimilarities determined in the table, which demonstrate that the intensity and direction of disclosure rationales vary among institutions. UNSW Sydney indicates the most vigorous and stable focus, which is due to its presentation of disclosure as a standard academic activity based on transparency, learning support, and fairness. Conversely, KSU lies between the two poles where disclosure is mainly motivated by institutional assessment governance and the necessity to maintain the validity of learning outcomes so that learning outcomes are viewed by students as an audit mechanism, but not a pedagogical practice. The compliance-based trend remains rather weak in USYD, in line with its emphasis on preventing breaches and procedural validity, making disclosure a liability to prevent malpractices. Altogether, the findings of the table are supported graphically to reflect the variations in institutional rationale in terms of how students perceive disclosure, i.e., educational transparency versus institutional oversight and regulatory compliance.

4.7 Implications for EFL/Multilingual Writers and Assessment Fairness

The cross-case patterns generate four interlinked risks for EFL and multilingual writers:

1. **The Granularity Problem.** EFL workflows often involve incremental GenAI use for translation, rephrasing, grammar, register adjustment, and paraphrasing. When policies use broad tool-scoping (UNSW) or minimal disclosure guidance (USYD), EFL students face a false choice: over-disclose minor language aids and risk being seen as lacking competence, or under-disclose integrated support and risk allegations of misconduct.

2. **The Delegation and Literacy Problem.** Delegating permission logic to course/assessment level (UNSW, USYD) and limited explicit frameworks elsewhere (e.g., Toronto, KAU) disproportionately disadvantages students with weaker institutional or disciplinary literacy—often multilingual writers who rely more heavily on GenAI for language support.

3. **The Detection Bias Problem.** Detection-heavy models exacerbate documented biases whereby AI detectors misclassify L2 writing as AI-generated at higher rates than L1 writing (Liang et al., 2023). Even fully disclosed and compliant GenAI use may be flagged due to L2 features, exposing EFL writers to unfair scrutiny.

4. **The Policy-Visibility Problem.** Policy-silence cases (e.g., QU, partially KAU) create inequities: students in low-visibility environments may be unaware of expectations and incur unintentional non-compliance compared to peers at institutions with clear, accessible guidance.

Together, these risks constitute a **procedural-justice** problem: disclosure governance can either mitigate or amplify inequalities depending on how clearly, routinely, and fairly it is implemented.

4.8 Policy Construction: Modality, Stance, and Responsibility

Beyond the codebook, the policy texts construct "acceptable use" through specific linguistic choices that encode stance and responsibility. KSU's use of strong obligation modals ("must disclose") positions GenAI use as tightly regulated and centres student responsibility for compliance. UNSW's permissive and advisory language ("will vary," "should check," "you may be able to

use") distributes responsibility across students, instructors, and programme designers, framing disclosure as a shared interpretive practice.

Where non-disclosure is explicitly labelled "misconduct" or "breach" (USYD, UNSW), students are invited to interpret disclosure rules as high-risk compliance thresholds; where it is framed broadly as an "integrity" concern (Toronto), the stakes appear more diffuse but also more ambiguous. These discursive patterns are performative rather than neutral: they shape how students understand their obligations, how staff perceive their policing role, and how legitimate GenAI-assisted writing appears within academic culture.

5. Cross-Case Comparison: Saudi vs. International Universities

5.1 Where Disclosure "Lives" in the Governance Architecture

A core structural contrast distinguishes the Saudi and international cases with respect to where GenAI disclosure is institutionally situated. Disclosure is anchored differently across governance architectures: at King Saud University (KSU), it is embedded within a formal assessment policy—a high-level governance instrument regulating assessment practices institution-wide; at UNSW Sydney, disclosure is distributed across student-facing academic skills and attribution guidance pages and operationalized through task-level instructional protocols; while at the University of Sydney, disclosure expectations are articulated indirectly through breach categorization and academic conduct rules (Figure 6).

The University of Toronto and King Abdulaziz University (KAU) do not provide publicly retrievable, discrete disclosure anchors within the studied time window. This variation in disclosure location has direct implications for enforcement clarity, assessment literacy, and student accessibility. When disclosure is anchored in a high-visibility assessment policy (as at KSU), it is more readily identifiable as a central institutional expectation shaping assessment behavior. When disclosure is distributed across guidance pages or delegated to task level, students must navigate multiple institutional documents to infer their obligations—an additional cognitive and procedural demand. Where disclosure is embedded implicitly within conduct rules, it becomes visible primarily in breach contexts, rendering it peripheral to everyday academic writing workflows.

From an applied linguistics perspective, the governance location of disclosure matters because it shapes how EFL writers encounter, interpret, and operationalize disclosure expectations during assessment-related writing tasks. Disclosure that is structurally proximate to assessment guidance is more likely to be internalized as part of routine academic writing practice rather than as a reactive compliance measure.

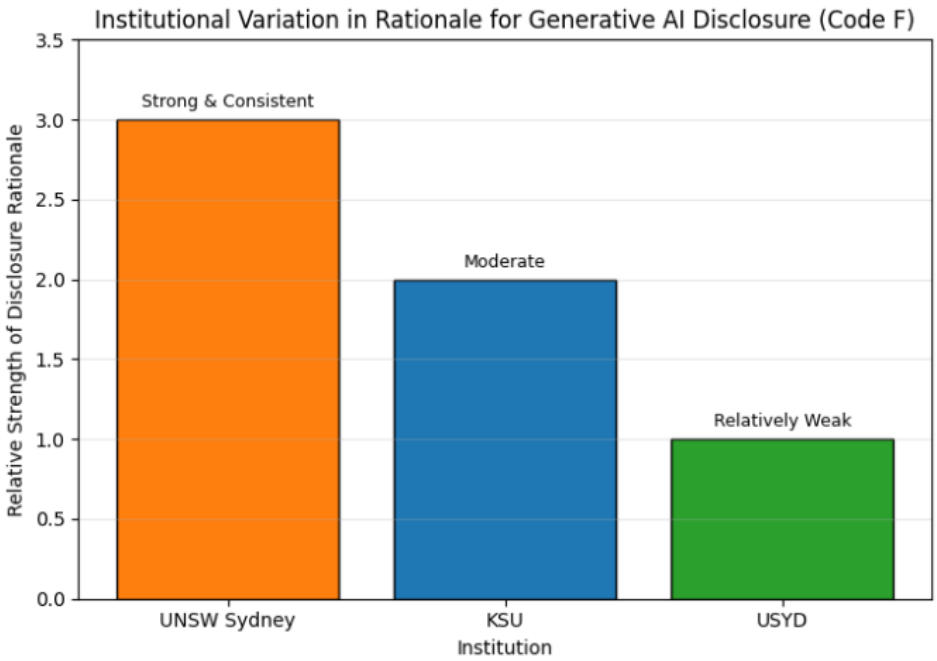


Figure 6: Cross-Case Comparison: Saudi vs. International Universities

5.2 The Granularity Problem in EFL Writing

EFL student writing workflows characteristically involve incremental and layered uses of GenAI—beginning at the planning stage (e.g., idea generation or prompt-based brainstorming), extending through drafting and revision, and frequently including sentence-level rephrasing, translation of complex concepts, register adjustment, and language accuracy support. In this multilayered context, disclosure policies that treat GenAI use as a monolithic act risk misalignment with the lived realities of EFL writing processes.

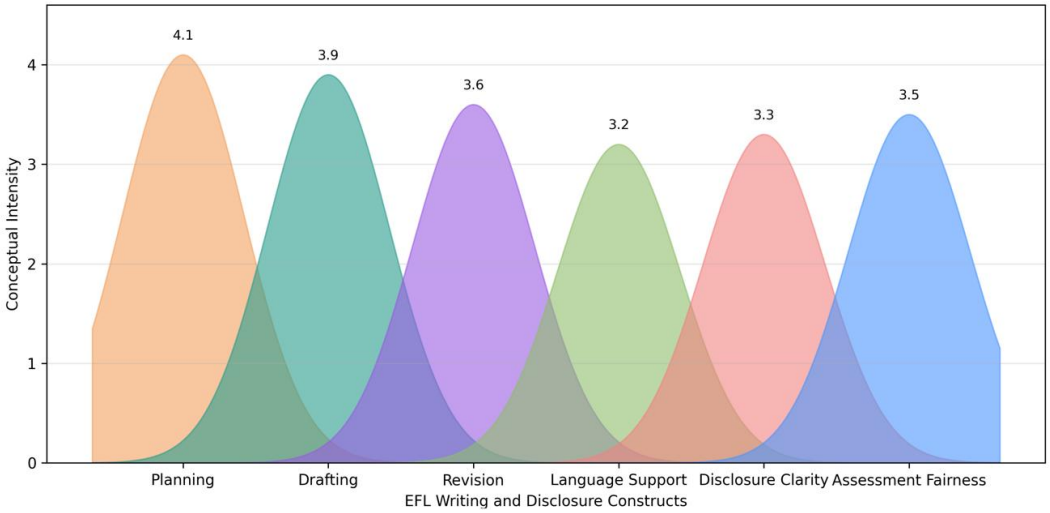


Figure 7: Key Constructs Associated With Granularity In EFL Writing Workflows And Generative AI Disclosure Practices

Figure 7 the conceptual representation of the granularity issue in writing in EFL by depicting the relative strength of critical constructs on which students draw on generative AI at various phases of the writing process. The overlapping curves on the table are Layered and incremental practices used in the planning, drafting, revision and language support as a result of workflow of EFL writers, as opposed to a discrete activity, demonstrating the disconnect between monolithic disclosure policies and the realities of EFL writers. It is also a figure that anticipates openness in disclosure and fairness in assessment; it shows the effect of institutional practices on the experiences of disclosure on students. Consistent with the table, visualization indicates that the policies with granular sensitivity and standardized guidance will be more appropriate to implement EFL practices, whereas the lack of definite templates can result in unequal practice of the policies and affect the inconsistency among the courses and disciplines.

Within the corpus, two institutional approaches emerge as analytically significant. First, broad tool scoping combined with explicit acknowledgment templates (e.g., UNSW Sydney, 2025c) reduces procedural uncertainty and may lower non-disclosure incentives by normalizing disclosure as a routine academic practice. When students are informed which tools fall within scope and are provided with concrete disclosure models, disclosure shifts from a stigmatized admission to a standardized component of assessment submission.

Second, KSU's requirement to disclose *where* and *how* GenAI was used aligns closely with the granular structure of EFL writing practices, reflecting sensitivity to task-level variation. However, in the absence of a standardized disclosure template or format guidance, this otherwise well-aligned requirement risks uneven enactment across courses and disciplines. Such variability may expose EFL students to inconsistent expectations shaped by individual instructor interpretation, potentially undermining assessment fairness.

5.3 Policy Visibility as a Governance Finding: The Saudi Subset

Policy Silence and Access Constraints: Qassim University and KAU

For Qassim University, the inability to verify a dated (2023–2025) university-wide GenAI disclosure document within the publicly retrievable corpus—despite site-restricted searches—must be treated as documented policy silence in terms of public governance visibility. This silence does not constitute evidence of institutional non-existence or neglect; rather, it reflects an access constraint, recorded as a governance visibility gap in the Search Log (Section 3.6).

In the case of King Abdulaziz University (KAU), the presence of an AI policy and guidance document with a stated issue date (2024) indicates institutional engagement with GenAI governance. However, limitations in retrieving the full policy text constrain defensible disclosure analysis beyond portal-level descriptions. Both cases exemplify what this study terms *incomplete public*

governance visibility: institutions may maintain internal guidance, yet such guidance is not uniformly accessible for student navigation or cross-institutional comparison.

This visibility gap carries direct equity and fairness implications. Students operating within institutions that provide transparent, publicly accessible disclosure guidance encounter clearer expectations than those studying in environments where disclosure requirements exist but are not readily retrievable. From an applied linguistics and assessment justice perspective, if disclosure is positioned as an assessment obligation, then the conditions governing that obligation should be publicly visible and equally accessible to all students subject to it.

6. Conclusion and Actionable Recommendations

6.1 Conclusion

This study examined how universities construct academic integrity and "acceptable use" of generative artificial intelligence (GenAI) through a disclosure-centred lens in university-wide policy discourse. Drawing on a comparative analysis of publicly retrievable institutional documents issued or updated between 2023 and 2025, the study focused on student-produced English academic writing as an EFL-relevant assessment context. Within this scope, disclosure emerged as a governance hinge: the procedural mechanism through which AI-mediated assistance becomes visible, accountable, and interpretable for assessment purposes.

Across the corpus, disclosure is positioned as a central integrity practice, yet it remains unevenly institutionalized. At King Saud University (KSU), disclosure is articulated as a mandatory student obligation embedded in a university-wide assessment policy, requiring students to declare where and how GenAI was used. This formulation is analytically significant because it aligns with the processual reality of academic writing, where GenAI assistance is typically distributed across multiple stages of composition rather than confined to a single moment of text generation. However, the absence of standardized templates, placement guidance, or format specifications creates an implementation gap that may result in uneven student compliance and inconsistent evaluation across disciplines.

International cases demonstrate more developed proceduralizing of disclosure. UNSW Sydney translates disclosure from principle into repeatable academic practice by embedding it within established attribution conventions and providing model statements and placement guidance. This approach reduces ambiguity and stigma by positioning disclosure as a normal component of scholarly writing rather than as an exceptional integrity audit. The University of Sydney adopts a more compliance-oriented approach, embedding disclosure expectations implicitly within breach categorization frameworks, which may preserve institutional flexibility but increases interpretive burden for students.

The integration of recent empirical research further illuminates the risks associated with disclosure governance. Evidence of disclosure stigma and documented algorithmic bias in AI-detection tools indicates that disclosure regimes may inadvertently disadvantage EFL and multilingual writers. When disclosure is framed primarily as a risk signal or misconduct trigger, students may face rational incentives for concealment. Moreover, asymmetries in transparency—where students are required to disclose GenAI use in detail while staff practices remain opaque—risk eroding trust and procedural fairness.

For Saudi institutions such as Qassim University and King Abdulaziz University, documented policy silence or limited public visibility constitutes a substantive governance finding rather than a mere data gap. Where disclosure is required, expectations must be publicly visible, accessible, and sufficiently granular to enable equitable compliance. Ultimately, disclosure governance must shift from an audit-centric model toward a pedagogical one, framing disclosure as a core component of academic literacy and digital scholarship rather than as a compliance hurdle.

6.2 Actionable Recommendations for Institutional Stakeholders

Recommendation 1: Operationalize Disclosure Across Three Dimensions

Universities should articulate disclosure requirements explicitly across three operational dimensions: (a) triggers (when disclosure is required), (b) content (what must be declared regarding GenAI assistance), and (c) format (how and where disclosure should be presented). Without specification in all three dimensions, disclosure remains vulnerable to inconsistent interpretation and uneven enforcement.

Recommendation 2: Align Disclosure with Assessment Design and Permission Logic

Disclosure requirements should be integrated directly into assessment design and clearly linked to task-specific permission rules. When students know what forms of GenAI use are permitted and how to declare them, disclosure becomes a routine scholarly practice rather than a post-hoc justification. This alignment is particularly important in EFL contexts, where explicit procedural guidance mitigates ambiguity and reduces compliance risk.

Recommendation 3: Standardise Templates and Placement Guidance

Institutions should provide institution-wide disclosure templates and clear placement instructions to ensure consistency across courses and disciplines. Standardisation reduces cognitive load for students, supports fair marking practices, and enables disclosure to function as a replicable academic convention.

Recommendation 4: Safeguard Procedural Fairness in Detection and Enforcement

Algorithmic detection tools should be framed explicitly as preliminary indicators requiring human review, not as determinative evidence of misconduct. Given documented biases against L2/EFL writing, detection results must always be contextualised within process evidence, drafts, and student explanations.

Recommendation 5: Promote Two-Way Transparency

To reduce disclosure stigma and foster trust, institutions should encourage transparency regarding staff use of AI in assessment design, feedback, and grading. Procedural symmetry signals that GenAI use is a shared academic reality rather than a unidirectional student risk.

By centring disclosure as a pedagogical practice rather than a compliance threshold, universities can maintain academic integrity while enabling language-diverse writers to engage responsibly with GenAI. When disclosure is routine, explicit, and fair, it supports intellectual agency, equity, and innovation in contemporary academic writing.

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APPENDIX

GRAPHICAL ABSTRACT